

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,
Plaintiff

v.

ALFRED W. TRENKLER,
Defendant

Criminal No.: 92-10369-Z

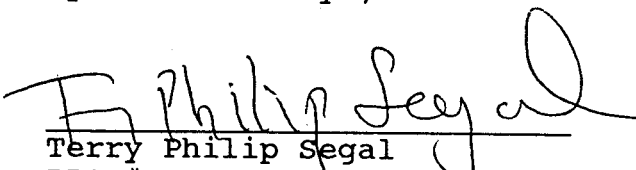
**DEFENDANT'S RESPONSE TO GOVERNMENT'S MOTION
TO COMPEL DISCLOSURE OF EVIDENCE BY DEFENDANT**

Now comes defendant and responds as follows to the government's motion:

1. Defendant's bomb expert, Denny Kline, a former F.B.I. explosives expert has examined the ATF explosive device evidence on two occasions. The last such examination was conducted on June 1, 1993. As a result of those examinations, Mr. Kline is in the process of preparing a report which upon receipt, defendant's counsel will turn over to the prosecution.

2. Defendant has not yet identified Rule 16(b)(1)(A) documentary and physical evidence which he plans to introduce at trial, but recognizes his obligations and upon such identification will make said evidence available to the prosecution.

Respectfully submitted,
For the Defendant,
ALFRED W. TRENKLER,
By his attorneys,


Terry Philip Segal
BBO # 450760
Scott P. Lopez
BBO # 549556
Segal & Feinberg
210 Commercial Street
Boston, MA 02109
(617) 720-4444

CERTIFICATE OF SERVICE

Dated: 6/4/93

I hereby certify that a true copy of the above document was served upon the attorney of record for each other party by mail (~~by hand~~) on 6/4/93

