

From: Paul Cassell <[REDACTED]>

To: "[REDACTED] (USAFLS)" <[REDACTED]>, Brad Edwards
<[REDACTED]>

Cc: "[REDACTED] (USAFLS)" <[REDACTED]>, "[REDACTED].
(USAFLS)" <[REDACTED]>

Subject: RE: Replies and Responses Due on January 6, 2012

Date: Fri, 06 Jan 2012 15:40:56 +0000

Importance: Normal

Hey [REDACTED]

As you know, we're happy to try and be accommodating. We would be glad to consent to additional time, but would ask in exchange for two things:

1. The various delays mean that several motions have now been (or will shortly be) pending for more than 90 days, triggering a 90 day report obligation under the local rules. We would trust you would be willing to file that with Judge Marra.
2. When we finished our telephone call with you some weeks back, Brad and I understood that we would be receiving (a) some initial discovery in the case and (b) a list of additional discovery that we could expect if your motion to dismiss is denied. But we have yet to receive anything at all regarding discovery. We would trust that you will carry through on what we understood you had agreed to in the telephone call.

Again, we are happy to help – but would ask you to help us on these two points. Thanks!

Paul Cassell

Co-counsel for Jane Doe #1 and Jane Doe #2

Paul G. Cassell

Ronald N. Boyce Presidential Professor of Criminal Law

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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From: [REDACTED] (USAFLS) [mailto:[REDACTED]]

Sent: Thursday, January 05, 2012 5:24 PM

To: Paul Cassell; Brad Edwards

Cc: [REDACTED] (USAFLS); [REDACTED]. (USAFLS)

Subject: Replies and Responses Due on January 6, 2012

Paul and Brad,

Happy New Year. I need to ask if you have an objection to the government seeking a second enlargement of time, up to Tuesday, January 24, 2012, to file replies to the victims' two responses to the government's motion to dismiss and motion

to stay discovery, and responses to the victims' protective motion to compel and protective motion for remedies.

██████ is preparing for an evidentiary hearing in a 28 U.S.C. 2255 motion, which is scheduled for January 24, 2012. I am scheduled to go to trial in a tort case sometime during the two week trial period commencing January 17, 2012. I have spent most of the preceding two weeks getting ready for the trial. My colleague ██████████, with sporadic assistance from ████████ and I, will be preparing the responses and replies.

Please let me know if you have any objections. Thanks.

██████