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[REDACTED]

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Subject: Any voluntary production of documents?

Date: Wed, 28 Sep 2011 15:50:25 +0000

Importance: Normal

Dear [REDACTED]

As you know, Judge Marra has now ordered discovery in this case. We are in the process of formulating our discovery requests.

We are writing to inquire as to whether the Government will voluntarily produce any documents to us. We understand that briefing is still on-going regarding the U.S. Attorney's correspondence. But there are other items that are plainly relevant that are not subject to that litigation, including (but not limited to): the "pros memo" in this case; the "case file" in this case; the draft indictments; the draft plea agreements and non-prosecution agreements; the draft CVRA notices to victims; information obtained by OPR as part of its investigation/inquiry; and correspondence or communications between the USAO and the FBI regarding this case, including crime victims issues.

It would obviously help us to narrow down our document production request if you would voluntarily provide some of this information to us. We also continue to believe that you are obligated to provide all of this information to us as part of (among other things) (1) the Justice Department's "best efforts" requirements under the CVRA, particularly now that Judge Marra has rejected your position that the CVRA was never triggered in this case; and (2) the Justice Department's obligation to afford victims their right to be "treated with fairness."

Thanks in advance for letting us know whether we can receive any voluntary production of documents relevant to our pending summary judgment motion. The favor of a reply by the close of business this Friday would be greatly appreciated.

Brad Edwards and Paul Cassell for Jane Doe #1 and Jane Doe #2

Paul G. Cassell

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