

From: Paul Cassell <[REDACTED]>

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

Cc: Brad Edwards <[REDACTED]>

Subject: RE: Government's position on two motions

Date: Wed, 01 Feb 2012 22:30:23 +0000

Importance: Normal

Dear [REDACTED],

Thank you for sending the seal pleading to us electronically last weekend. We really appreciate it.

We are now working on responding to your reply on the issue of remedies. As you know, the Government has placed the entire reply under seal.

With all due respect, we believe that placing the entire document under seal is inappropriate. The vast majority of the issues and arguments in the pleading are not confidential. We believe that placing them under seal violates DOJ policy as well as constitutional First Amendment principles.

Placing the document under seal also creates significant problems for the victims. Just as you have been consulting your colleagues in Washington, D.C., on these issues, we have been consulting with our friends in the victims' rights movement around the country. Because your document is entirely under seal, it appears that send it to them for their review would violate the sealing order.

In view of these facts, we are writing to ask whether the Government would oppose a motion by the victims that the Government file a redacted pleading in the open court file, redacting only information that refers directly and specifically to grand jury proceedings. We are planning on filing on unsealed motion to that effect shortly.

We are also writing to ask what would be the Government's position on an additional motion, asking for unsealing of all information mentioned at page 32 n.20 of the Government's pleading (information regarding Epstein's offenses committed in other jurisdictions).

Thank you in advance for providing the Government's position on these issues.

Paul and Brad

Paul G. Cassell

Ronald N. Boyce Presidential Professor of Criminal Law

[REDACTED]
[REDACTED]
[REDACTED]
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EFTA00205525

From: Paul Cassell

Sent: Friday, January 27, 2012 1:14 PM

To: [REDACTED] (USAFLS) ([REDACTED]); [REDACTED] (USAFLS) ([REDACTED])

Cc: 'Brad Edwards'

Subject: can you send ... ?

Hey [REDACTED],

I gather from your public filing yesterday you have a sealed response on the remedies issue – which is presumably heading towards us in snail mail. Would you be able to send Brad and me an electronic copy today? I want to read it this weekend, because I'm pretty jammed up next week.

Thanks in advance for any help you can extend. Paul

Paul G. Cassell

Ronald N. Boyce Presidential Professor of Criminal Law

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

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