





































































































-----  
**From:**

[Redacted]

**Sent:**

Tuesday, November 22, 2011 12:27 PM

**To:**

Brad Edwards

**Subject:**

FYI

**Attachments:**

111711Epstein NY Appellate Division Decision.pdf

Hi Brad – The DA in New York sent this to me. I thought you might be interested. Also, [REDACTED] mentioned that if you and Paul want to send a proposed redacted motion for us to consider, we are happy to do so.

<<111711Epstein NY Appellate Division Decision.pdf>>

[REDACTED]  
Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

[REDACTED]

-----  
**From:** Morse, Deborah [REDACTED]  
**Sent:** Tuesday, November 22, 2011 12:15 PM  
**To:** [REDACTED]  
**Subject:** FW: Jeffrey E. Epstein  
**Attachments:** 111711Epstein.docx

FYI, [REDACTED] I will call you later today or tomorrow. Meantime, thanks for your kind words.

Best,  
[REDACTED]

\*\*\*\*\*  
This email communication and any files transmitted with it contain privileged and confidential information from the New York County District Attorney's Office and are intended solely for the use of the individuals or entity to whom it has been addressed. If you are not the intended recipient, you are hereby notified that any dissemination or copying of this email is strictly prohibited. If you have received this email in error, please delete it and notify the sender by return email.  
\*\*\*\*\*

-----  
**From:** [REDACTED]  
**To:** Morse, Deborah  
**Sent:** Tuesday, November 22, 2011 12:16 PM  
**Subject:** Read: Jeffrey E. Epstein

Your message

To: [REDACTED]  
Subject: FW: Jeffrey E. Epstein  
Sent: Tuesday, November 22, 2011 12:15:09 PM (UTC-05:00) Eastern Time (US & Canada)

was read on Tuesday, November 22, 2011 12:15:04 PM (UTC-05:00) Eastern Time (US & Canada).

-----  
**From:** [REDACTED]  
**Sent:** Wednesday, November 30, 2011 5:29 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Telephone Conference re: Epstein & [REDACTED] United States

Yes. I can be available.

[REDACTED]  
Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

[REDACTED]  
-----  
**From:** [REDACTED]  
**Sent:** Wednesday, November 30, 2011 5:28 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Telephone Conference re: Epstein & [REDACTED] United States

I just spoke to [REDACTED] He is available tomorrow at 1:30, for about an hour, or on Friday either from 10:00-11:30 am or from 1:00-3:30 pm.

Are you both available tomorrow at 1:30?

[REDACTED]  
-----  
**From:** [REDACTED]  
**Sent:** Tuesday, November 29, 2011 6:11 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Telephone Conference re: Epstein & Jane Doe [REDACTED] United States

Hi, [REDACTED]

I hope you had a great Thanksgiving.

As we had previously discussed, I am contacting you to see if we can set up a telephone conference to address some of the outstanding matters that we need to discuss to complete the transfer of the criminal case to your district and meet our obligations under USAP 3-2.170.001. (I also left a message with your assistant earlier today.) Those matters include: the nature and scope of any charges/investigation that may potentially remain viable in the SDFL following the entry of the Non-Prosecution Agreement; the need to advise the FBI in connection with the agents' pending requests for grand jury subpoenas and their expressed intent to continue investigating allegations against Epstein, advice which in all likelihood will require informing the FBI agents about other USAOs that might be able to assist them in light of the grand jury evidence previously obtained; and the handling of the criminal case file.

We ([REDACTED] [REDACTED] who was previously assigned to the criminal investigation; [REDACTED] [REDACTED], who is handling the CVRA litigation; and me) can make ourselves available to confer with you after 10:30 tomorrow morning, tomorrow afternoon, or Thursday morning. If those blocks of time do not work, please let us know and we can make other arrangements to accommodate your schedule.

Thanks,

[REDACTED]

Counselor to the United States Attorney

United States Attorney's Office

99 N.E. 4th Street, Suite 800

Miami, FL 33132

Telephone: [REDACTED]

[REDACTED]

-----  
**From:** [REDACTED]  
**To:** [REDACTED]  
**Sent:** Wednesday, November 30, 2011 5:29 PM  
**Subject:** Read: Telephone Conference re: Epstein & Jane Doe [REDACTED] Enited States

Your message

To: [REDACTED]  
Subject: RE: Telephone Conference re: Epstein & Jane Doe [REDACTED] Enited States  
Sent: Wednesday, November 30, 2011 5:28:51 PM (UTC-05:00) Eastern Time (US & Canada)

was read on Wednesday, November 30, 2011 5:29:01 PM (UTC-05:00) Eastern Time (US & Canada).

-----  
**From:** [REDACTED]  
**Sent:** Tuesday, November 29, 2011 6:11 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Telephone Conference re: Epstein & Jane Doe [REDACTED] Enited States

EFTA00206055

Hi, [REDACTED]

I hope you had a great Thanksgiving.

As we had previously discussed, I am contacting you to see if we can set up a telephone conference to address some of the outstanding matters that we need to discuss to complete the transfer of the criminal case to your district and meet our obligations under USAP 3-2.170.001. (I also left a message with your assistant earlier today.) Those matters include: the nature and scope of any charges/investigation that may potentially remain viable in the SDFL following the entry of the Non-Prosecution Agreement; the need to advise the FBI in connection with the agents' pending requests for grand jury subpoenas and their expressed intent to continue investigating allegations against Epstein, advice which in all likelihood will require informing the FBI agents about other USAOs that might be able to assist them in light of the grand jury evidence previously obtained; and the handling of the criminal case file.

We ([REDACTED], who was previously assigned to the criminal investigation; [REDACTED], who is handling the CVRA litigation; and me) can make ourselves available to confer with you after 10:30 tomorrow morning, tomorrow afternoon, or Thursday morning. If those blocks of time do not work, please let us know and we can make other arrangements to accommodate your schedule.

Thanks,

[REDACTED]  
Counselor to the United States Attorney

United States Attorney's Office

99 N.E. 4th Street, Suite 800

Miami, FL 33132

Telephone: [REDACTED]

E-mail [REDACTED]

-----  
From:

Sent:

[REDACTED]  
Wednesday, November 30, 2011 5:28 PM

To:

Cc:

Subject:

[REDACTED]  
RE: Telephone Conference re: Epstein & Jane Doe [REDACTED] United States

I just spoke to [REDACTED] He is available tomorrow at 1:30, for about an hour, or on Friday either from 10:00-11:30 am or from 1:00-3:30 pm.

Are you both available tomorrow at 1:30?

[REDACTED]

EFTA00206056

**From:** [REDACTED]  
**Sent:** Tuesday, November 29, 2011 6:11 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Telephone Conference re: Epstein & Jane Doe [REDACTED] Enited States

Hi [REDACTED]

I hope you had a great Thanksgiving.

As we had previously discussed, I am contacting you to see if we can set up a telephone conference to address some of the outstanding matters that we need to discuss to complete the transfer of the criminal case to your district and meet our obligations under USAP 3-2.170.001. (I also left a message with your assistant earlier today.) Those matters include: the nature and scope of any charges/investigation that may potentially remain viable in the SDFL following the entry of the Non-Prosecution Agreement; the need to advise the FBI in connection with the agents' pending requests for grand jury subpoenas and their expressed intent to continue investigating allegations against Epstein, advice which in all likelihood will require informing the FBI agents about other USAOs that might be able to assist them in light of the grand jury evidence previously obtained; and the handling of the criminal case file.

We ([REDACTED], who was previously assigned to the criminal investigation; [REDACTED], who is handling the CVRA litigation; and me) can make ourselves available to confer with you after 10:30 tomorrow morning, tomorrow afternoon, or Thursday morning. If those blocks of time do not work, please let us know and we can make other arrangements to accommodate your schedule.

Thanks,

[REDACTED]  
[REDACTED]

Counselor to the United States Attorney

United States Attorney's Office

99 N.E. 4th Street, Suite 800

Miami, FL 33132

Telephone: [REDACTED]

E-mail: [REDACTED]

---

**From:** [REDACTED]  
**Sent:** Tuesday, December 06, 2011 3:34 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Telephone Conference re: Epstein & Jane Doe [REDACTED] Enited States

[REDACTED]:

I hope you are feeling better and are fully recuperated. Please let me know when we can set up the rescheduled conference call to address the outstanding issues.

Best regards,

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Wednesday, November 30, 2011 7:35 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Telephone Conference re: Epstein & Jane Doe [REDACTED], Enited States

[REDACTED]

We're on for 1:30 tomorrow. I'll set things up for a conference call at that time and send out the call-in information.

Thanks,

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Tuesday, November 29, 2011 6:11 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Telephone Conference re: Epstein & Jane Doe [REDACTED], Enited States

H [REDACTED]

I hope you had a great Thanksgiving.

As we had previously discussed, I am contacting you to see if we can set up a telephone conference to address some of the outstanding matters that we need to discuss to complete the transfer of the criminal case to your district and meet our obligations under USAP 3-2.170.001. (I also left a message with your assistant earlier today.) Those matters include: the nature and scope of any charges/investigation that may potentially remain viable in the SDFL following the entry of the Non-Prosecution Agreement; the need to advise the FBI in connection with the agents' pending requests for grand jury subpoenas and their expressed intent to continue investigating allegations against Epstein, advice which in all likelihood will require informing the FBI agents about other USAOs that might be able to assist them in light of the grand jury evidence previously obtained; and the handling of the criminal case file.

We [REDACTED] who was previously assigned to the criminal investigation; [REDACTED] who is handling the CVRA litigation; and me) can make ourselves available to confer with you after 10:30 tomorrow morning, tomorrow afternoon, or Thursday morning. If those blocks of time do not work, please let us know and we can make other arrangements to accommodate your schedule.

Thanks,

[REDACTED]

Counselor to the United States Attorney

United States Attorney's Office

99 N.E. 4th Street, Suite 800

Miami, FL 33132

Telephone: [REDACTED]

E-mail: [REDACTED]

-----  
**From:** [REDACTED]  
**Sent:** Monday, December 05, 2011 8:57 PM  
**To:** [REDACTED]  
**Subject:** Jane Does Responses  
**Attachments:** DE127\_20111205\_Jane Does Resp to Motn to Dismiss.pdf; DE130\_20111205\_Jane Does Motn to Compel.pdf; DE129\_20111205\_Jane Does Resp to Motn to Stay Discovery.pdf; DE128\_20111205\_Jane Does Protective Motion for Remedies.pdf

Hi everyone: Here are the responses of the Jane Does. If they filed anything under seal I haven't received it.

<<DE127\_20111205\_Jane Does Resp to Motn to Dismiss.pdf>> <<DE130\_20111205\_Jane Does Motn to Compel.pdf>>  
<<DE129\_20111205\_Jane Does Resp to Motn to Stay Discovery.pdf>> <<DE128\_20111205\_Jane Does Protective Motion for Remedies.pdf>>

[REDACTED]

Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

[REDACTED]

-----  
**From:** [REDACTED]  
**Sent:** Thursday, December 08, 2011 4:44 PM  
**To:** [REDACTED]  
**Subject:** RE: Jane Does [REDACTED] US -- Sealed Response to Motion to Dismiss

I recall that most of the victims invoked the NPA provision that required Epstein not to raise the absence of a predicate federal conviction as a defense to subject matter jurisdiction. [REDACTED] would know for sure.

[REDACTED]

**From:** [REDACTED]  
**Sent:** Thursday, December 08, 2011 4:31 PM  
**To:** [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] [REDACTED] (USAFLS)  
**Subject:** Re: Jane Does [REDACTED] US -- Sealed Response to Motion to Dismiss

Do we have the case numbers of the Jane Does' civil cases against Epstein? What about the other victims cases? It would be interesting to see if they invoked the NPAs provisions against Epstein.

**From:** [REDACTED], [REDACTED] (USAFLS)  
**Sent:** Thursday, December 08, 2011 04:26 PM  
**To:** [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] [REDACTED] (USAFLS)  
**Subject:** RE: Jane Does [REDACTED] US -- Sealed Response to Motion to Dismiss

Mid morning is fine for me.

**From:** [REDACTED], [REDACTED] (USAFLS)  
**Sent:** Thursday, December 08, 2011 4:20 PM  
**To:** [REDACTED], [REDACTED] [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Subject:** Re: Jane Does [REDACTED] US -- Sealed Response to Motion to Dismiss

Would mid-morning (about 10:30) work for everyone, or do you have another preference?

**From:** [REDACTED], [REDACTED] [REDACTED] (USAFLS)  
**Sent:** Thursday, December 08, 2011 04:16 PM  
**To:** [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Subject:** Re: Jane Does [REDACTED] US -- Sealed Response to Motion to Dismiss

Let me know what time  
A. [REDACTED], AUSA

**From:** [REDACTED], [REDACTED] (USAFLS)  
**Sent:** Thursday, December 08, 2011 04:09 PM  
**To:** [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] [REDACTED]. (USAFLS)  
**Subject:** RE: Jane Does [REDACTED] US -- Sealed Response to Motion to Dismiss

Let's do it tomorrow. I will have my Blackberry on. I believe our replies are due on December 15.

I am set to go to trial before Judge Ungaro during the two week term commencing January 16, 2012. She just denied my motion for continuance, so it looks like the case is going forward.

[REDACTED]

**From:** [REDACTED], [REDACTED] (USAFLS)  
**Sent:** Thursday, December 08, 2011 4:02 PM  
**To:** [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] [REDACTED]. (USAFLS)  
**Subject:** Re: Jane Does [REDACTED] US -- Sealed Response to Motion to Dismiss

I'm actually out of the office today on sick leave. If you want to talk today, I can call in, but I have not yet had a chance to review the sealed pleading and I was not inclined to forward the sealed document to my gmail account.

Let me know what you both prefer.

[REDACTED]

**From:** [REDACTED], [REDACTED] (USAFLS)  
**Sent:** Thursday, December 08, 2011 03:54 PM  
**To:** [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] [REDACTED]. (USAFLS)  
**Subject:** RE: Jane Does [REDACTED] US -- Sealed Response to Motion to Dismiss

[REDACTED],

I will be out of the office tomorrow, but I can call in. Do you want to try something today?

[REDACTED]

**From:** [REDACTED], [REDACTED] (USAFLS)  
**Sent:** Thursday, December 08, 2011 3:39 PM  
**To:** [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Subject:** Re: Jane Does [REDACTED] US -- Sealed Response to Motion to Dismiss

Can all three of us get together on the phone tomorrow?

**From:** [REDACTED], [REDACTED] [REDACTED] (USAFLS)  
**Sent:** Thursday, December 08, 2011 11:47 AM  
**To:** [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Subject:** Jane Does [REDACTED] US -- Sealed Response to Motion to Dismiss

Hi [REDACTED] and [REDACTED] – Here is the sealed portion of their response. Judge Marra's clerk called to confirm that we had no objection to the Motion to Seal. I stated that we had no objection.

I am on vacation next week. We really HAVE to get this file transferred to the Middle District.

<<20111206 Sealed Response to Motn to Dismiss.pdf>>

[REDACTED]  
Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

[REDACTED]  
Fax [REDACTED]

-----  
**From:** [REDACTED], [REDACTED] (USAFLS) <[REDACTED]>  
**Sent:** Thursday, December 08, 2011 4:31 PM  
**To:** [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] [REDACTED] (USAFLS)  
**Subject:** Re: Jane Does [REDACTED] US -- Sealed Response to Motion to Dismiss

Do we have the case numbers of the Jane Does' civil cases against Epstein? What about the other victims cases? It would be interesting to see if they invoked the NPAs provisions against Epstein.

**From:** [REDACTED], [REDACTED] (USAFLS)  
**Sent:** Thursday, December 08, 2011 04:26 PM  
**To:** [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] [REDACTED] (USAFLS)  
**Subject:** RE: Jane Does [REDACTED] US -- Sealed Response to Motion to Dismiss

Mid morning is fine for me.

**From:** [REDACTED], [REDACTED] (USAFLS)  
**Sent:** Thursday, December 08, 2011 4:20 PM  
**To:** [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Subject:** Re: Jane Does [REDACTED] US -- Sealed Response to Motion to Dismiss

Would mid-morning (about 10:30) work for everyone, or do you have another preference?

**From:** [REDACTED], [REDACTED] [REDACTED] (USAFLS)  
**Sent:** Thursday, December 08, 2011 04:16 PM  
**To:** [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Subject:** Re: Jane Does [REDACTED] US -- Sealed Response to Motion to Dismiss

Let me know what time  
[REDACTED], AUSA

**From:** [REDACTED], [REDACTED] (USAFLS)  
**Sent:** Thursday, December 08, 2011 04:09 PM  
**To:** [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] [REDACTED] (USAFLS)  
**Subject:** RE: Jane Does [REDACTED] US -- Sealed Response to Motion to Dismiss

Let's do it tomorrow. I will have my Blackberry on. I believe our replies are due on December 15.

I am set to go to trial before Judge Ungaro during the two week term commencing January 16, 2012. She just denied my motion for continuance, so it looks like the case is going forward.

[REDACTED]

**From:** [REDACTED], [REDACTED] (USAFLS)  
**Sent:** Thursday, December 08, 2011 4:02 PM  
**To:** [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] [REDACTED] (USAFLS)  
**Subject:** Re: Jane Does [REDACTED] US -- Sealed Response to Motion to Dismiss

I'm actually out of the office today on sick leave. If you want to talk today, I can call in, but I have not yet had a chance to review the sealed pleading and I was not inclined to forward the sealed document

to my gmail account.

Let me know what you both prefer.

■

**From:** ■, ■ (USAFLS)  
**Sent:** Thursday, December 08, 2011 03:54 PM  
**To:** ■, ■ (USAFLS); ■, ■ ■. (USAFLS)  
**Subject:** RE: Jane Does ■ US -- Sealed Response to Motion to Dismiss

■,

I will be out of the office tomorrow, but I can call in. Do you want to try something today?

■

**From:** ■, ■ (USAFLS)  
**Sent:** Thursday, December 08, 2011 3:39 PM  
**To:** ■, ■ ■. (USAFLS); ■, ■ (USAFLS)  
**Subject:** Re: Jane Does ■ US -- Sealed Response to Motion to Dismiss

Can all three of us get together on the phone tomorrow?

**From:** ■, ■ ■. (USAFLS)  
**Sent:** Thursday, December 08, 2011 11:47 AM  
**To:** ■, ■ (USAFLS); ■, ■ (USAFLS)  
**Subject:** Jane Does ■ US -- Sealed Response to Motion to Dismiss

Hi ■ and ■ – Here is the sealed portion of their response. Judge Marra's clerk called to confirm that we had no objection to the Motion to Seal. I stated that we had no objection.

I am on vacation next week. We really HAVE to get this file transferred to the Middle District.

<<20111206 Sealed Response to Motn to Dismiss.pdf>>

■ ■ ■

Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

[REDACTED]  
Fax [REDACTED]

-----  
**From:** Paul Cassell <[REDACTED]>  
**Sent:** Sunday, December 04, 2011 1:55 PM  
**To:** [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Cc:** Brad Edwards  
**Subject:** RE: extra pages

Hey [REDACTED], [REDACTED] and [REDACTED],

Sorry I had to leave the call early Friday. Meant to check with you on this then.

I am working with Brad to finalize our pleadings to be filed on Monday in response to the motion to dismiss. We are filing an unsealed pleading (that does not discuss grand jury material) as well as a sealed pleading (that discusses only the grand jury material and related issues). The unseal pleading is 24 pages long and the sealed pleading is 7 pages long.

We also have a response to the motion to stay which is well under the 20 page limit.

Any objection to a motion for the extra pages (4 + 7, although I'm not sure whether we count the 7) to respond to your motion to dismiss?

Thanks for your help on getting back to us. PC  
Paul G. Cassell  
Ronald N. Boyce Presidential Professor of Criminal Law  
S.J. Quinney College of Law at the University of Utah  
332 S. 1400 E. , Room 101  
Salt Lake City, UT 84112-0730  
[REDACTED] (phone)  
[REDACTED] (fax)  
[REDACTED]

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**From:** [REDACTED], [REDACTED] (USAFLS) [REDACTED]  
**Sent:** Thursday, December 01, 2011 3:23 PM  
**To:** Paul Cassell; [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Cc:** Brad Edwards  
**Subject:** RE: Conference call 11:15 AM Florida time - Friday

Paul,

We will take care of the arrangements for tomorrow at 11:15 a.m. Thanks.

[REDACTED]  
**From:** Paul Cassell [mailto:[REDACTED]]  
**Sent:** Thursday, December 01, 2011 4:59 PM  
**To:** [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Cc:** Brad Edwards; [REDACTED], [REDACTED] (USAFLS)  
**Subject:** RE: Conference call 11:15 AM Florida time - Friday

EFTA00206065

Hi all,

Does 11:15 AM Florida time on Friday work?

If so, please call my cell phone [REDACTED] as well as Brad – [REDACTED] can y'all initiate the conference call or set up a call in number?

Looking forward to chatting. PC

Paul G. Cassell  
Ronald N. Boyce Presidential Professor of Criminal Law  
S.J. Quinney College of Law at the University of Utah  
332 South 1400 East, Room 101  
Salt Lake City, UT 84112-0730  
Voice: [REDACTED]  
Fax: [REDACTED]  
Email: [REDACTED]  
<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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From: [REDACTED], [REDACTED] (USAFLS) [mailto:[REDACTED]]  
Sent: Thursday, December 01, 2011 2:34 PM  
To: [REDACTED], [REDACTED] (USAFLS); Paul Cassell  
Cc: Brad Edwards; [REDACTED], [REDACTED] (USAFLS)  
Subject: RE: Discovery Issues in Epstein - conference call at 5 PM today?

Hi everyone – Sorry, I am having a very busy duty week. Tomorrow I have court at 9:00 probably until 11:00 and then again from 3:00 until 5:00. I have a debriefing at 1:00, but I should be able to step out after 1:30. So, 11:15 or 1:30 are best for me, but your schedules take priority.

[REDACTED]  
Assistant U.S. Attorney  
500 S. Australian Ave, Suite 400  
West Palm Beach, FL 33401  
[REDACTED]  
Fax [REDACTED]

From: [REDACTED], [REDACTED] (USAFLS)  
Sent: Thursday, December 01, 2011 3:52 PM  
To: Paul Cassell  
Cc: [REDACTED], [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
Subject: RE: Discovery Issues in Epstein - conference call at 5 PM today?

Unfortunately, that doesn't work for us today. Can we set up a time for tomorrow?

[REDACTED]  
[REDACTED]  
Counselor to the United States Attorney  
United States Attorney's Office  
99 N.E. 4th Street, Suite 800  
Miami, FL 33132  
Telephone: [REDACTED]  
E-mail: [REDACTED] <mailto:[REDACTED]>

-----Original Message-----

From: Paul Cassell [mailto: [REDACTED]]>  
Sent: Thursday, December 01, 2011 2:22 PM  
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS)  
Cc: [REDACTED]  
Subject: RE: Discovery Issues in Epstein - conference call at 5 PM today?

Hi [REDACTED] and Co.,

Thanks for the call. Sorry I was on the other line.

Can we set up a time certain? That way Brad can participate.

He is in a depo until 4:30, but should be free at 5 PM your time today (Thursday). Does that work?

Looking forward to chatting. PC

Paul G. Cassell

Ronald N. Boyce Presidential Professor of Criminal Law

S.J. Quinney College of Law at the University of Utah

332 South 1400 East, Room 101

Salt Lake City, UT 84112-0730

Voice: [REDACTED]

Fax: [REDACTED]

Email: [REDACTED]

<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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-----Original Message-----

EFTA00206067

From: Paul Cassell

Sent: Thursday, December 01, 2011 11:25 AM

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

Cc: [REDACTED]'

Subject: RE: Discovery Issues in Epstein

Dear Mr. [REDACTED],

We will shortly be filing a motion to compel Government responses to our discovery requests -- discovery which, as you know, Judge Marra has already ordered. We realize, of course, that the Government has filed a motion to dismiss/stay. But if the Government's position is rejected on those motions, then the next issue is what discovery can we expect to receive from the Government.

If the motions are denied, will the Government voluntarily produce anything to us? Will the government at least agree to produce the following:

- (1) The Government's initial disclosures pursuant to Fed. R. Civ. P. 26;
- (2) Answers to all of the victims' requests for admission;
- (3) All documents, correspondence, and other information that the Government distributed to persons or entities outside of the federal Government or received from persons or entities outside of the federal government; and
- (4) All documents, correspondence, and other information covered by the victims' discovery request that is not subject to a claim of privilege.

And, for all other information withheld, will the Government agree to produce a document-by-document privilege log, as required by the local rules?

Thanks for your help on these questions and Brad and I have.

Sincerely,

Paul Cassell

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

Paul G. Cassell

Ronald N. Boyce Presidential Professor of Criminal Law S.J. Quinney College of Law at the University of Utah

EFTA00206068

332 South 1400 East, Room 101

Salt Lake City, UT 84112-0730

Voice: [REDACTED]

Fax: [REDACTED]

Email: [REDACTED]

<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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-----  
**Subject:** 11:15 Conf Call re Epstein/Jane Does

**Start:** Fri 12/2/2011 11:00 AM

**End:** Fri 12/2/2011 12:00 PM

**Recurrence:** (none)

**Organizer:** [REDACTED], [REDACTED] [REDACTED] (USAFLS)

-----  
**From:** Paul Cassell <[REDACTED]>

**Sent:** Sunday, December 04, 2011 2:07 PM

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

**Cc:** Brad Edwards

**Subject:** RE: extra pages

Thanks for asking -- yes everything went smoothly. Paul

Paul G. Cassell  
Ronald N. Boyce Presidential Professor of Criminal Law  
S.J. Quinney College of Law at the University of Utah  
332 S. 1400 E. , Room 101  
Salt Lake City, UT 84112-0730

[REDACTED] (phone)

[REDACTED] (fax)

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

EFTA00206069

Sent: Sunday, December 04, 2011 12:00 PM  
To: Paul Cassell; [REDACTED], [REDACTED] (USAFLS)  
Cc: Brad Edwards  
Subject: RE: extra pages

No objection to the extra pages. I hope that all went well on Friday.

[REDACTED]  
[REDACTED]  
Assistant U.S. Attorney

-----Original Message-----

From: Paul Cassell [mailto:cassellp@law.utah.edu]  
Sent: Sunday, December 04, 2011 1:55 PM  
To: [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED], [REDACTED] (USAFLS)  
Cc: Brad Edwards  
Subject: RE: extra pages

Hey [REDACTED], [REDACTED] and [REDACTED],

Sorry I had to leave the call early Friday. Meant to check with you on this then.

I am working with Brad to finalize our pleadings to be filed on Monday in response to the motion to dismiss. We are filing an unsealed pleading (that does not discuss grand jury material) as well as a sealed pleading (that discusses only the grand jury material and related issues). The unseal pleading is 24 pages long and the sealed pleading is 7 pages long.

We also have a response to the motion to stay which is well under the 20 page limit.

Any objection to a motion for the extra pages (4 + 7, although I'm not sure whether we count the 7) to respond to your motion to dismiss?

Thanks for your help on getting back to us. PC  
Paul G. Cassell  
Ronald N. Boyce Presidential Professor of Criminal Law  
S.J. Quinney College of Law at the University of Utah  
332 S. 1400 E. , Room 101  
Salt Lake City, UT 84112-0730  
[REDACTED] (phone)  
[REDACTED] (fax)  
cassellp@law.utah.edu

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From: [REDACTED], [REDACTED] (USAFLS) [REDACTED]  
Sent: Thursday, December 01, 2011 3:23 PM  
To: Paul Cassell; [REDACTED], [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
Cc: Brad Edwards  
Subject: RE: Conference call 11:15 AM Florida time - Friday

Paul,

We will take care of the arrangements for tomorrow at 11:15 a.m. Thanks.

[REDACTED]  
From: Paul Cassell [mailto:cassellp@law.utah.edu]  
Sent: Thursday, December 01, 2011 4:59 PM  
To: [REDACTED], [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
Cc: Brad Edwards; [REDACTED], [REDACTED] (USAFLS)  
Subject: RE: Conference call 11:15 AM Florida time - Friday

EFTA00206070

Hi all,

Does 11:15 AM Florida time on Friday work?

If so, please call my cell phone [REDACTED] as well as Brad - [REDACTED] can y'all initiate the conference call or set up a call in number?

Looking forward to chatting. PC

Paul G. Cassell  
Ronald N. Boyce Presidential Professor of Criminal Law  
S.J. Quinney College of Law at the University of Utah  
332 South 1400 East, Room 101  
Salt Lake City, UT 84112-0730  
Voice: [REDACTED]  
Fax: [REDACTED]  
Email: [REDACTED]  
<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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From: [REDACTED], [REDACTED] [REDACTED] (USAFLS) [mailto:[REDACTED]]  
Sent: Thursday, December 01, 2011 2:34 PM  
To: [REDACTED], [REDACTED] (USAFLS); Paul Cassell  
Cc: Brad Edwards; [REDACTED], [REDACTED] (USAFLS)  
Subject: RE: Discovery Issues in Epstein - conference call at 5 PM today?

Hi everyone - Sorry, I am having a very busy duty week. Tomorrow I have court at 9:00 probably until 11:00 and then again from 3:00 until 5:00. I have a debriefing at 1:00, but I should be able to step out after 1:30. So, 11:15 or 1:30 are best for me, but your schedules take priority.

[REDACTED]  
Assistant U.S. Attorney  
500 S. Australian Ave, Suite 400  
West Palm Beach, FL 33401  
[REDACTED]  
Fax [REDACTED]

From: [REDACTED], [REDACTED] (USAFLS)  
Sent: Thursday, December 01, 2011 3:52 PM  
To: Paul Cassell  
Cc: Brad Edwards; [REDACTED], [REDACTED] [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
Subject: RE: Discovery Issues in Epstein - conference call at 5 PM today?

Unfortunately, that doesn't work for us today. Can we set up a time for tomorrow?

[REDACTED]  
[REDACTED]  
Counselor to the United States Attorney  
United States Attorney's Office  
99 N.E. 4th Street, Suite 800  
Miami, FL 33132  
Telephone: [REDACTED]  
E-mail: [REDACTED] <mailto:[REDACTED]>

-----Original Message-----

From: Paul Cassell [mailto: [REDACTED] ]>  
Sent: Thursday, December 01, 2011 2:22 PM  
To: [REDACTED], [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
Cc: Brad Edwards  
Subject: RE: Discovery Issues in Epstein - conference call at 5 PM today?

Hi [REDACTED] and Co.,

Thanks for the call. Sorry I was on the other line.

Can we set up a time certain? That way Brad can participate.

He is in a depo until 4:30, but should be free at 5 PM your time today (Thursday). Does that work?

Looking forward to chatting. PC

Paul G. Cassell

Ronald N. Boyce Presidential Professor of Criminal Law

S.J. Quinney College of Law at the University of Utah

332 South 1400 East, Room 101

Salt Lake City, UT 84112-0730

Voice: [REDACTED]

Fax: [REDACTED]

Email: [REDACTED]

<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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-----Original Message-----

From: Paul Cassell

Sent: Thursday, December 01, 2011 11:25 AM

To: '██████████, ██████████ ██████████ ██████████' (USAFLS); '██████████, ██████████ ██████████ ██████████' (USAFLS); '██████████, ██████████ ██████████ ██████████' (USAFLS)

Cc: 'Brad Edwards'

Subject: RE: Discovery Issues in Epstein

Dear Mr. ██████████,

We will shortly be filing a motion to compel Government responses to our discovery requests -- discovery which, as you know, Judge Marra has already ordered. We realize, of course, that the Government has filed a motion to dismiss/stay. But if the Government's position is rejected on those motions, then the next issue is what discovery can we expect to receive from the Government.

If the motions are denied, will the Government voluntarily produce anything to us? Will the government at least agree to produce the following:

- (1) The Government's initial disclosures pursuant to Fed. R. Civ. P. 26;
- (2) Answers to all of the victims' requests for admission;
- (3) All documents, correspondence, and other information that the Government distributed to persons or entities outside of the federal Government or received from persons or entities outside of the federal government; and
- (4) All documents, correspondence, and other information covered by the victims' discovery request that is not subject to a claim of privilege.

And, for all other information withheld, will the Government agree to produce a document-by-document privilege log, as required by the local rules?

Thanks for your help on these questions and Brad and I have.

Sincerely,

Paul Cassell

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

Paul G. Cassell

EFTA00206073

Ronald N. Boyce Presidential Professor of Criminal Law S.J. Quinney College of Law at the University of Utah

332 South 1400 East, Room 101

Salt Lake City, UT 84112-0730

Voice: [REDACTED]

Fax: [REDACTED]

Email: [REDACTED]

<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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-----  
**From:** [REDACTED], [REDACTED] (USAFLS) [REDACTED]  
**Sent:** Sunday, December 04, 2011 2:00 PM  
**To:** Paul Cassell; [REDACTED] (USAFLS)  
**Cc:** Brad Edwards  
**Subject:** RE: extra pages

No objection to the extra pages. I hope that all went well on Friday.

[REDACTED]

A. [REDACTED] Villafaña  
Assistant U.S. Attorney

-----Original Message-----

**From:** Paul Cassell [mailto:cassellp@law.utah.edu]  
**Sent:** Sunday, December 04, 2011 1:55 PM  
**To:** [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Cc:** Brad Edwards  
**Subject:** RE: extra pages

Hey [REDACTED], [REDACTED] and [REDACTED],

Sorry I had to leave the call early Friday. Meant to check with you on this then.

I am working with Brad to finalize our pleadings to be filed on Monday in response to the motion to dismiss. We are filing an unsealed pleading (that does not discuss grand jury material) as well as a sealed pleading (that discusses only the grand jury material and related issues). The unsealed pleading is 24 pages long and the sealed pleading is 7 pages long.

We also have a response to the motion to stay which is well under the 20 page limit.

Any objection to a motion for the extra pages (4 + 7, although I'm not sure whether we count the 7) to respond to your motion to dismiss?

Thanks for your help on getting back to us. PC  
Paul G. Cassell

EFTA00206074

Ronald N. Boyce Presidential Professor of Criminal Law  
S.J. Quinney College of Law at the University of Utah  
332 S. 1400 E. , Room 101  
Salt Lake City, UT 84112-0730  
[REDACTED] (phone)  
[REDACTED] (fax)  
cassellp@law.utah.edu

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From: [REDACTED], [REDACTED] (USAFLS) [mailto:[REDACTED]]  
Sent: Thursday, December 01, 2011 3:23 PM  
To: Paul Cassell; [REDACTED], [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
Cc: Brad Edwards  
Subject: RE: Conference call 11:15 AM Florida time - Friday

Paul,

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[REDACTED]

From: Paul Cassell [mailto:cassellp@law.utah.edu]  
Sent: Thursday, December 01, 2011 4:59 PM  
To: [REDACTED], [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
Cc: Brad Edwards; [REDACTED], [REDACTED] (USAFLS)  
Subject: RE: Conference call 11:15 AM Florida time - Friday

Hi all,

Does 11:15 AM Florida time on Friday work?

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Looking forward to chatting. PC

Paul G. Cassell  
Ronald N. Boyce Presidential Professor of Criminal Law  
S.J. Quinney College of Law at the University of Utah  
332 South 1400 East, Room 101  
Salt Lake City, UT 84112-0730  
Voice: [REDACTED]  
Fax: [REDACTED]  
Email: cassellp@law.utah.edu<mailto:cassellp@law.utah.edu>  
<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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From: [REDACTED], [REDACTED], [REDACTED] (USAFLS) [mailto:[REDACTED]]  
Sent: Thursday, December 01, 2011 2:34 PM  
To: [REDACTED], [REDACTED] (USAFLS); Paul Cassell  
Cc: Brad Edwards; [REDACTED], [REDACTED] (USAFLS)  
Subject: RE: Discovery Issues in Epstein - conference call at 5 PM today?

Hi everyone - Sorry, I am having a very busy duty week. Tomorrow I have court at 9:00 probably until 11:00 and then again from 3:00 until 5:00. I have a debriefing at 1:00, but I should be able to step out after 1:30. So, 11:15 or 1:30 are best for me, but your schedules take priority.

[REDACTED]  
Assistant U.S. Attorney  
500 S. Australian Ave, Suite 400  
West Palm Beach, FL 33401

[REDACTED]  
Fax [REDACTED]

From: [REDACTED], [REDACTED] (USAFLS)  
Sent: Thursday, December 01, 2011 3:52 PM  
To: Paul Cassell  
Cc: Brad Edwards; [REDACTED], [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
Subject: RE: Discovery Issues in Epstein - conference call at 5 PM today?

Unfortunately, that doesn't work for us today. Can we set up a time for tomorrow?

[REDACTED]  
[REDACTED]  
Counselor to the United States Attorney  
United States Attorney's Office  
99 N.E. 4th Street, Suite 800  
Miami, FL 33132  
Telephone: [REDACTED]  
E-mail: [REDACTED] <mailto:[REDACTED]>

-----Original Message-----

From: Paul Cassell [mailto:cassellp@law.utah.edu] <mailto:[mailto:cassellp@law.utah.edu]>  
Sent: Thursday, December 01, 2011 2:22 PM  
To: [REDACTED], [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
Cc: Brad Edwards  
Subject: RE: Discovery Issues in Epstein - conference call at 5 PM today?

Hi [REDACTED] and Co.,

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Can we set up a time certain? That way Brad can participate.

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Looking forward to chatting. PC

EFTA00206076

Paul G. Cassell

Ronald N. Boyce Presidential Professor of Criminal Law

S.J. Quinney College of Law at the University of Utah

332 South 1400 East, Room 101

Salt Lake City, UT 84112-0730

Voice: [REDACTED]

Fax: [REDACTED]

Email: [REDACTED]

<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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-----Original Message-----

From: Paul Cassell

Sent: Thursday, December 01, 2011 11:25 AM

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

Cc: 'Brad Edwards'

Subject: RE: Discovery Issues in Epstein

Dear Mr. [REDACTED],

We will shortly be filing a motion to compel Government responses to our discovery requests -- discovery which, as you know, Judge Marra has already ordered. We realize, of course, that the Government has filed a motion to dismiss/stay. But if the Government's position is rejected on those motions, then the next issue is what discovery can we expect to receive from the Government.

If the motions are denied, will the Government voluntarily produce anything to us? Will the government at least agree to produce the following:

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- (2) Answers to all of the victims' requests for admission;

EFTA00206077

(3) All documents, correspondence, and other information that the Government distributed to persons or entities outside of the federal Government or received from persons or entities outside of the federal government; and

(4) All documents, correspondence, and other information covered by the victims' discovery request that is not subject to a claim of privilege.

And, for all other information withheld, will the Government agree to produce a document-by-document privilege log, as required by the local rules?

Thanks for your help on these questions and Brad and I have.

Sincerely,

Paul Cassell

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

Paul G. Cassell

Ronald N. Boyce Presidential Professor of Criminal Law S.J. Quinney College of Law at the University of Utah

332 South 1400 East, Room 101

Salt Lake City, UT 84112-0730

Voice: [REDACTED]

Fax: [REDACTED]

Email: [cassellp@law.utah.edu](mailto:cassellp@law.utah.edu)<<mailto:cassellp@law.utah.edu>>

<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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---

**From:** [REDACTED], [REDACTED] (USAFLS) <[AVillafana@usa.doj.gov](mailto:AVillafana@usa.doj.gov)>  
**Sent:** Friday, January 06, 2012 12:37 PM  
**To:** [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Subject:** Status of Outstanding Motions/Discovery issue

EFTA00206078

Hi [REDACTED] and [REDACTED]:

There are several motions that are fully briefed but have not been decided:

DE50: Petitioners' Motion for an Order Directing the U.S. Attorney's Office Not to Withhold Relevant Evidence (this was "held in abeyance" while the Court ordered "limited discovery").

DE51: Petitioners' Motion to Use Correspondence to Provide Violations of the CVRA and to Have their Unredacted Pleadings Unsealed.

DE56: Motion to Intervene by Roy Black, Martin Weinberg, and Jay Lefkowitz

DE93: Motion for Limited Intervention by Jeffrey Epstein

The first three were all addressed by the Court at the August 12, 2011 hearing, although the Court allowed supplemental briefing after the hearing on DE56. The last of that supplemental briefing was filed on 10/31/2011.

DE93 was fully briefed on 10/14/2011.

The 90-day mark on DE93 will be January 12<sup>th</sup>. My reading of Rule 7.1(b)(3)(B) is that if there is a hearing, even with supplemental briefing thereafter, one counts from the date of the hearing, and that date has long since passed, so there is nothing to report on DE50, DE51, and DE56.

With regard to the outstanding motions, there are:

DE119: Our motion to dismiss for lack of subject matter jurisdiction was filed on 11/8/2011. The Jane Does' Opposition was filed on 12/5/2011. Our Reply has not yet been filed.

DE121: Our motion to stay discovery was filed on 11/8/2011. The Jane Does' Opposition was filed on 12/5/2011. Our Reply has not yet been filed.

DE128: Petitioners' Protective Motion for Remedies was filed on 12/5/2011. Our Opposition has not yet been filed.

DE130: Petitioners' Protective Motion to Compel was filed on 12/5/2011. We have not yet filed our Opposition.

One does not begin calculating the 90 days on these motions until briefing is completed.

As to the rest of Mr. Cassell's email, I don't recall promising early discovery, I only remember promising that, if the motion to stay was denied, we would be ready with our production. Is my memory off? I was going to recommend that I talk to Brad about some of the requests and ask if they have information that leads them to believe that there is evidence to be found (for example, re Bill Clinton or Prince Andrew) so that they can point us in the right direction. I would hate for us to deny something based on my knowledge and find out later about some obscure contact in DC. Thoughts?

To be ready with our production, though, I really need a legal assistant or attorney from Miami to come up here and sort through all of my boxes with me. And someone needs to order Jeff and Alex's records back from Archives (I don't know if Matt or Andy's materials are in archives or any closed file rooms). And someone needs to reach out to CEOS and the DAAG and AAG's offices, as well as DOJ Appellate.

This discovery issue is going to be massive if we are ordered to respond, so it would help to have a civil legal assistant assigned.

[REDACTED]

Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

[REDACTED]  
Fax [REDACTED]

---

**From:** [REDACTED], [REDACTED] (USAFLS) <DLee@usa.doj.gov>  
**Sent:** Friday, January 06, 2012 2:36 PM  
**To:** [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] [REDACTED] (USAFLS)  
**Subject:** RE: Status of Outstanding Motions/Discovery issue

[REDACTED] and [REDACTED],

Since Cassell has conditioned his nonopposition with conditions, and since we don't agree with what the conditions, shall we just file our motion and say that the victims oppose it? That seems easier than engaging in a never-ending debate with Cassell on the construction and interpretation of the 90 day rule.

My trial will begin on January 17, at 10:00 a.m. I am in the process now of notifying my witnesses and arranging times for their trial preparation interviews next week. I can put together a second motion for enlargement of time, but it will be after close of business. Thanks.

---

**From:** [REDACTED], [REDACTED] (USAFLS)  
**Sent:** Friday, January 06, 2012 2:24 PM  
**To:** [REDACTED], [REDACTED] [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Subject:** RE: Status of Outstanding Motions/Discovery issue

Under Local Rule 7.1(b)(4), the motions/responses/replies that would be the subject of the extension are not subject to the 90-day notice because none is a "motion or other matter which has been pending and fully briefed with no hearing set thereon for a period of ninety (90) days" and none is a "motion or other matter as to which the Court has conducted a hearing." Cassell's concern regarding those motions is thus unmerited. With respect to the other matters that [REDACTED] has identified, they are not our motions, and Rule 7.1(b)(4) makes clear that the notice obligation is imposed on the "the movant or applicant." Notably, under the terms of the recently amended and renumbered rule, the notice must be "serve[d] on all parties and any affected non-parties." The explicit filing requirement was deleted from the rule.

As to "initial discovery," my recollection is that, notwithstanding the motion to stay discovery, we expressed a willingness to look at and consider a request for the government to provide discovery of discrete items where the resulting production would be relevant, not burdensome, and not otherwise objectionable. But I am unaware of any communication asking us to consider any more limited discovery request. I don't recall any representation that we would provide "a list of additional discovery that we could expect if [Petitioners'] motion to dismiss is denied," or anything else of the sort. It is not anything to which I would have been inclined to agree.

■

---

**From:** ■■■■■, ■■■■■ ■■■■■ (USAFLS)  
**Sent:** Friday, January 06, 2012 12:37 PM  
**To:** ■■■■■, ■■■■■ (USAFLS); ■■■■■, ■■■■■ (USAFLS)  
**Subject:** Status of Outstanding Motions/Discovery issue

Hi ■■■ and ■■■■■:

There are several motions that are fully briefed but have not been decided:

DE50: Petitioners' Motion for an Order Directing the U.S. Attorney's Office Not to Withhold Relevant Evidence (this was "held in abeyance" while the Court ordered "limited discovery").

DE51: Petitioners' Motion to Use Correspondence to Provide Violations of the CVRA and to Have their Unredacted Pleadings Unsealed.

DE56: Motion to Intervene by Roy Black, Martin Weinberg, and Jay Lefkowitz

DE93: Motion for Limited Intervention by Jeffrey Epstein

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[REDACTED]

Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

[REDACTED]

Fax [REDACTED]

-----  
**From:** [REDACTED], [REDACTED] (USAFLS) <[REDACTED]>  
**Sent:** Friday, January 06, 2012 2:24 PM  
**To:** [REDACTED], [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Subject:** RE: Status of Outstanding Motions/Discovery issue

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[REDACTED]

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**From:** [REDACTED], [REDACTED] (USAFLS)  
**Sent:** Friday, January 06, 2012 12:37 PM  
**To:** [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Subject:** Status of Outstanding Motions/Discovery issue

Hi [REDACTED] and [REDACTED]:

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[REDACTED]  
Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

[REDACTED]  
Fax [REDACTED]

-----  
**From:** [REDACTED]  
**Sent:** Friday, December 09, 2011 11:22 AM  
**To:** [REDACTED], [REDACTED], [REDACTED] (USAFLS)  
**Subject:** FW: Jeffrey Epstein lawyers want to depose Scott Rothstein

Endless...

**From:** [REDACTED]  
**Sent:** Friday, December 09, 2011 11:20 AM  
**To:** Sheehan, Evelyn B. (USAFLS)  
**Subject:** Jeffrey Epstein lawyers want to depose Scott Rothstein

[http://www.dailybusinessreview.com/PubArticleDBR.jsp?id=1202534991568&Jeffrey\\_Epstein\\_lawyers\\_want\\_to\\_depose\\_Scott\\_Rothstein=&et=editorial&bu=Daily%20Business%20Review&cn=12.09.11&src=EMC-Email&pt=Daily%20am&kw=Jeffrey%20Epstein%20lawyers%20want%20to%20depose%20Scott%20Rothstein&slreturn=1](http://www.dailybusinessreview.com/PubArticleDBR.jsp?id=1202534991568&Jeffrey_Epstein_lawyers_want_to_depose_Scott_Rothstein=&et=editorial&bu=Daily%20Business%20Review&cn=12.09.11&src=EMC-Email&pt=Daily%20am&kw=Jeffrey%20Epstein%20lawyers%20want%20to%20depose%20Scott%20Rothstein&slreturn=1)

## Jeffrey Epstein lawyers want to depose Scott Rothstein

Lawyers for convicted billionaire Jeffrey Epstein will ask a bankruptcy judge for permission to depose Ponzi scammer Scott Rothstein during his two-week deposition beginning next week.

U.S. Bankruptcy Judge Raymond Ray in Fort Lauderdale set the hearing on Epstein's arguments.

Epstein, who pleaded guilty in 2008 to soliciting prostitution following accusations that he had sex with girls, completed his year of house arrest last year.

Epstein also is suing Rothstein and former Rothstein Rosenfeldt Adler attorney Bradley Edwards for allegedly filing a frivolous case.

Rothstein's deposition begins Monday in Miami and is set to last through Christmas Eve with about 30 lawyers in line to question the former lawyer convicted of masterminding a \$1.2 billion settlement financing fraud.

Rothstein, who is in protective custody, is serving a 50-year sentence at an undisclosed location.

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**From:** [REDACTED]  
**Sent:** Friday, January 06, 2012 2:45 PM  
**To:** [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Subject:** RE: Status of Outstanding Motions/Discovery issue

[REDACTED]

Yes. Has Brad asked for preliminary responses? Can we actually respond in writing within the allotted 30 days? If we can, I think we should do so.

[REDACTED]

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**From:** [REDACTED], [REDACTED] (USAFLS)  
**Sent:** Friday, January 06, 2012 2:42 PM  
**To:** [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Subject:** RE: Status of Outstanding Motions/Discovery issue

Am I authorized to talk through the Requests for Admissions with Brad and give him my preliminary responses?

[REDACTED]

Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

[REDACTED]

Fax [REDACTED]

---

**From:** [REDACTED], [REDACTED] (USAFLS)  
**Sent:** Friday, January 06, 2012 2:36 PM

**To:** █████, █████ (USAFLS); █████, █████ █. (USAFLS)  
**Subject:** RE: Status of Outstanding Motions/Discovery issue

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Assistant U.S. Attorney

EFTA00206087

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

[REDACTED]

Fax [REDACTED]

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**From:** [REDACTED], [REDACTED] (USAFLS) <[REDACTED]>  
**Sent:** Friday, December 09, 2011 9:39 AM  
**To:** [REDACTED] (USAFLS); [REDACTED] (USAFLS)  
**Subject:** My active items summary  
**Attachments:** Case Status Reporting Form December 2011.wpd

Hi R [REDACTED] – Sorry, I meant to send this out last night, too.

<<Case Status Reporting Form December 2011.wpd>>

[REDACTED]

Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

[REDACTED]

Fax [REDACTED]

---

**From:** [REDACTED], [REDACTED] (USAFLS) <[REDACTED]>  
**Sent:** Friday, January 06, 2012 2:42 PM  
**To:** [REDACTED] (USAFLS); [REDACTED] (USAFLS)  
**Subject:** RE: Status of Outstanding Motions/Discovery issue

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[REDACTED]

Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

[REDACTED]

Fax [REDACTED]

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**To:** [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] [REDACTED] (USAFLS)  
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[REDACTED]  
Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

[REDACTED]  
Fax [REDACTED]

-----  
**From:** [REDACTED], [REDACTED] (USAFLS) <[REDACTED]>  
**Sent:** Friday, January 06, 2012 6:32 PM  
**To:** [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Subject:** Re: Jane Doe litigation

Were either of you able to confirm that these plaintiffs are our petitioners?

**From:** [REDACTED], [REDACTED] (USAFLS)  
**Sent:** Wednesday, January 04, 2012 08:26 PM  
**To:** [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Subject:** Jane Doe litigation

[REDACTED] & [REDACTED]:

Can you confirm that the plaintiffs in the cases cited below are the petitioners in our CVRA matter?

First Am. Compl. ¶¶ 32-33, *Doe v. Epstein*, Case No. 08-80893-CIV-MARRA (“assert[ing] a cause of action against the Defendant, Jeffrey Epstein, pursuant to [18 U.S.C. § 2255] and the [Non-Prosecution] agreement between the Defendant, Jeffrey Epstein, and the United States Government”); Compl. ¶¶ 19-20, *L.M. v. Epstein*, Case No. 09-81092-CIV-Cohn (asserting that plaintiff was “covered by” provisions of the Non-Prosecution Agreement between the government and Epstein and that Epstein was thus “estopped by his plea and agreement with the Federal Government from denying the acts alleged in [the] Complaint, and must effectively admit liability to the Plaintiff, L.M., including admitting liability for all counts enumerated in this Complaint”)

Thanks,

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**From:** ■■■■■, ■■■■■ ■■■■■ (USAFLS) ■■■■■  
**Sent:** Friday, January 06, 2012 2:49 PM  
**To:** ■■■■■, ■■■■■ (USAFLS); ■■■■■, ■■■■■ (USAFLS)  
**Subject:** RE: Status of Outstanding Motions/Discovery issue

I can only respond within 30 days based upon my own knowledge. Someone needs to gather information from DC and figure out what happened within the Miami office. So, no, I do not believe that we can answer within the allotted time. But we can at least provide some "preliminary" discovery.

■■■■■  
Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

■■■■■  
Fax ■■■■■

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**From:** ■■■■■, ■■■■■ (USAFLS)  
**Sent:** Friday, January 06, 2012 2:45 PM  
**To:** ■■■■■, ■■■■■ ■■■■■ (USAFLS); ■■■■■, ■■■■■ (USAFLS)  
**Subject:** RE: Status of Outstanding Motions/Discovery issue

■■■■■  
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**From:** ■■■■■, ■■■■■ ■■■■■ (USAFLS)  
**Sent:** Friday, January 06, 2012 2:42 PM  
**To:** ■■■■■, ■■■■■ (USAFLS); ■■■■■, ■■■■■ (USAFLS)  
**Subject:** RE: Status of Outstanding Motions/Discovery issue

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■■■■■  
Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

██████████  
Fax ██████████

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**Sent:** Friday, January 06, 2012 2:36 PM  
**To:** ██████, ██████ (USAFLS); ██████, ██████ ██████. (USAFLS)  
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The first three were all addressed by the Court at the August 12, 2011 hearing, although the Court allowed supplemental briefing after the hearing on DE56. The last of that supplemental briefing was filed on 10/31/2011.

DE93 was fully briefed on 10/14/2011.

The 90-day mark on DE93 will be January 12<sup>th</sup>. My reading of Rule 7.1(b)(3)(B) is that if there is a hearing, even with supplemental briefing thereafter, one counts from the date of the hearing, and that date has long since passed, so there is nothing to report on DE50, DE51, and DE56.

With regard to the outstanding motions, there are:

DE119: Our motion to dismiss for lack of subject matter jurisdiction was filed on 11/8/2011. The Jane Does' Opposition was filed on 12/5/2011. Our Reply has not yet been filed.

DE121: Our motion to stay discovery was filed on 11/8/2011. The Jane Does' Opposition was filed on 12/5/2011. Our Reply has not yet been filed.

DE128: Petitioners' Protective Motion for Remedies was filed on 12/5/2011. Our Opposition has not yet been filed.

DE130: Petitioners' Protective Motion to Compel was filed on 12/5/2011. We have not yet filed our Opposition.

One does not begin calculating the 90 days on these motions until briefing is completed.

As to the rest of Mr. Cassell's email, I don't recall promising early discovery, I only remember promising that, if the motion to stay was denied, we would be ready with our production. Is my memory off? I was going to recommend that I talk to Brad about some of the requests and ask if they have information that leads them to believe that there is evidence to be found (for example, re Bill Clinton or Prince Andrew) so that they can point us in the right direction. I would hate for us to deny something based on my knowledge and find out later about some obscure contact in DC. Thoughts?

To be ready with our production, though, I really need a legal assistant or attorney from Miami to come up here and sort through all of my boxes with me. And someone needs to order Jeff and Alex's records back from Archives (I don't know if Matt or Andy's materials are in archives or any closed file rooms). And someone needs to reach out to CEOS and the DAAG and AAG's offices, as well as DOJ Appellate.

This discovery issue is going to be massive if we are ordered to respond, so it would help to have a civil legal assistant assigned.

[REDACTED]

Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

[REDACTED]

Fax [REDACTED]

---

**From:** [REDACTED], [REDACTED] [REDACTED] (USAFLS) <AVillafana@usa.doj.gov>  
**Sent:** Friday, December 09, 2011 1:10 PM  
**To:** [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Cc:** Lavecchio, [REDACTED] (USAFLS)  
**Subject:** FW: Jeffrey Epstein lawyers want to depose Scott Rothstein

FYI – I assume they are trying to get some information on Brad Edwards.

Larry – are you handling this? I will be out next week. [REDACTED] and [REDACTED] are handling the Epstein matter, so can you keep them up to date on this?

[REDACTED]

Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

[REDACTED]

Fax [REDACTED]

**From:** [REDACTED]  
**Sent:** Friday, December 09, 2011 11:22 AM  
**To:** [REDACTED], [REDACTED] [REDACTED] (USAFLS)  
**Subject:** FW: Jeffrey Epstein lawyers want to depose Scott Rothstein

Endless...

**From:** E [REDACTED]  
**Sent:** Friday, December 09, 2011 11:20 AM  
**To:** S [REDACTED]  
**Subject:** Jeffrey Epstein lawyers want to depose Scott Rothstein

[http://www.dailybusinessreview.com/PubArticleDBR.jsp?id=1202534991568&Jeffrey\\_Epstein\\_lawyers\\_want\\_to\\_depose\\_Scott\\_Rothstein=&et=editorial&bu=Daily%20Business%20Review&cn=12.09.11&src=EMC-Email&pt=Daily%20am&kw=Jeffrey%20Epstein%20lawyers%20want%20to%20depose%20Scott%20Rothstein&slreturn=1](http://www.dailybusinessreview.com/PubArticleDBR.jsp?id=1202534991568&Jeffrey_Epstein_lawyers_want_to_depose_Scott_Rothstein=&et=editorial&bu=Daily%20Business%20Review&cn=12.09.11&src=EMC-Email&pt=Daily%20am&kw=Jeffrey%20Epstein%20lawyers%20want%20to%20depose%20Scott%20Rothstein&slreturn=1)

## Jeffrey Epstein lawyers want to depose Scott Rothstein

Lawyers for convicted billionaire Jeffrey Epstein will ask a bankruptcy judge for permission to depose Ponzi scammer Scott Rothstein during his two-week deposition beginning next week.

U.S. Bankruptcy Judge Raymond Ray in Fort Lauderdale set the hearing on Epstein's arguments.

Epstein, who pleaded guilty in 2008 to soliciting prostitution following accusations that he had sex with girls, completed his year of house arrest last year.

Epstein also is suing Rothstein and former Rothstein Rosenfeldt Adler attorney Bradley Edwards for allegedly filing a frivolous case.

Rothstein's deposition begins Monday in Miami and is set to last through Christmas Eve with about 30 lawyers in line to question the former lawyer convicted of masterminding a \$1.2 billion settlement financing fraud.

Rothstein, who is in protective custody, is serving a 50-year sentence at an undisclosed location.

---

**From:** [REDACTED], [REDACTED] (USAFLS) <[REDACTED]>  
**Sent:** Thursday, December 01, 2011 5:13 PM  
**To:** Brad Edwards; Paul Cassell; [REDACTED], [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Subject:** RE: Conference call 11:15 AM Florida time - Friday

11:15 a.m. is also good for me.

[REDACTED]

**From:** Brad Edwards [mailto:[REDACTED]]  
**Sent:** Thursday, December 01, 2011 5:04 PM  
**To:** Paul Cassell; [REDACTED], [REDACTED], [REDACTED]. (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Cc:** [REDACTED], [REDACTED] (USAFLS)  
**Subject:** RE: Conference call 11:15 AM Florida time - Friday

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**Brad Edwards**

Civil Justice Attorney

**Farmer, Jaffe, Weissing,**

**Edwards, Fistos & Lehrman, P.L.**

425 North Andrews Avenue, Suite 2

Fort Lauderdale, Florida 33301

Telephone: [REDACTED]

Facsimile: [REDACTED]

Toll-free: 1-[REDACTED]

[REDACTED]

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**From:** Paul Cassell [mailto:[REDACTED]]  
**Sent:** Thursday, December 01, 2011 4:59 PM  
**To:** [REDACTED], [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Cc:** Brad Edwards; [REDACTED], [REDACTED] (USAFLS)  
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Paul G. Cassell

Ronald N. Boyce Presidential Professor of Criminal Law

S.J. Quinney College of Law at the University of Utah

332 South 1400 East, Room 101

Salt Lake City, UT 84112-0730

Voice: [REDACTED]

Fax: [REDACTED]

Email: [REDACTED]

<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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West Palm Beach, FL 33401

[REDACTED]  
Fax [REDACTED]

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[REDACTED]

[REDACTED] [REDACTED]

**Counselor to the United States Attorney**

**United States Attorney's Office**

**99 N.E. 4th Street, Suite 800**

**Miami, FL 33132**

**Telephone:** [REDACTED]

**E-mail:** [REDACTED]

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Sent: Thursday, December 01, 2011 2:22 PM

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

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

Cc: 'Brad Edwards'

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EFTA00206101

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

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Salt Lake City, UT 84112-0730

Voice: [REDACTED]

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Salt Lake City, UT 84112-0730

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Fax: [REDACTED]

Email: [REDACTED]

<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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**Sent:** Thursday, December 01, 2011 2:34 PM  
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**Cc:** Brad Edwards; [REDACTED], [REDACTED] (USAFLS)  
**Subject:** RE: Discovery Issues in Epstein - conference call at 5 PM today?

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[REDACTED]

Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

[REDACTED]

Fax [REDACTED]

**From:** [REDACTED], [REDACTED] (USAFLS)  
**Sent:** Thursday, December 01, 2011 3:52 PM  
**To:** Paul Cassell  
**Cc:** Brad Edwards; [REDACTED], [REDACTED] [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Subject:** RE: Discovery Issues in Epstein - conference call at 5 PM today?

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[REDACTED]

[REDACTED] / [REDACTED]

**Counselor to the United States Attorney**

**United States Attorney's Office**

**99 N.E. 4th Street, Suite 800**

**Miami, FL 33132**

**Telephone:** [REDACTED]

**E-mail:** [REDACTED]

-----Original Message-----

From: Paul Cassell [[mailto:\[REDACTED\]](mailto:[REDACTED])]

Sent: Thursday, December 01, 2011 2:22 PM

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

Cc: Brad Edwards

Subject: RE: Discovery Issues in Epstein - conference call at 5 PM today?

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Salt Lake City, UT 84112-0730

Voice: [REDACTED]

Fax: [REDACTED]

Email: [REDACTED]

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From: Paul Cassell

Sent: Thursday, December 01, 2011 11:25 AM

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

Cc: 'Brad Edwards'

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[REDACTED]  
[REDACTED]  
Counselor to the United States Attorney

United States Attorney's Office

99 N.E. 4th Street, Suite 800

Miami, FL 33132

Telephone: [REDACTED]

E-mail: [REDACTED]

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

Paul G. Cassell

Ronald N. Boyce Presidential Professor of Criminal Law S.J. Quinney College of Law at the University of Utah

<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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-----  
**From:** Maria Kelljchian <maria@pathtojustice.com>  
**Sent:** Thursday, December 01, 2011 4:55 PM  
**To:** [REDACTED], [REDACTED] [REDACTED] (USAFLS)  
**Cc:** Brad Edwards; 'Paul Cassell'  
**Subject:** JANE DOE #1 and JANE DOE#2 vs. US  
**Attachments:** Doe\_1st\_Req4Admissions\_to\_US.pdf

Please see attached. Mailed out today.

Thank you,

Maria

**Maria W. Kelljchian**

Florida Registered Paralegal

**Farmer, Jaffe, Weissing,**

**Edwards, Fistos & Lehrman, P.L.**

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-----  
**From:** [REDACTED], [REDACTED] (USAFLS) <DLee@usa.doj.gov>  
**To:** [REDACTED], [REDACTED] [REDACTED] (USAFLS)  
**Sent:** Thursday, December 01, 2011 4:38 PM  
**Subject:** Read: Discovery Issues in Epstein - conference call at 5 PM today?

Your message

To: [REDACTED], [REDACTED] (USAFLS)  
Subject: RE: Discovery Issues in Epstein - conference call at 5 PM today?  
Sent: Thursday, December 01, 2011 4:33:54 PM (UTC-05:00) Eastern Time (US & Canada)

was read on Thursday, December 01, 2011 4:37:50 PM (UTC-05:00) Eastern Time (US & Canada).

-----  
**From:** [REDACTED], [REDACTED] [REDACTED] (USAFLS) [REDACTED]  
**Sent:** Thursday, December 01, 2011 8:19 PM  
**To:** [REDACTED], [REDACTED] (USAFLS)  
**Subject:** RE: Conference call 11:15 AM Florida time - Friday

Hi [REDACTED] – I am going to have to call in from the Igloo at the courthouse. If you can send me an email with all the info, I would appreciate it.

[REDACTED]

Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

[REDACTED]

Fax [REDACTED]

**From:** [REDACTED], [REDACTED] (USAFLS)  
**Sent:** Thursday, December 01, 2011 5:24 PM  
**To:** Paul Cassell; [REDACTED], [REDACTED] [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Cc:** Brad Edwards  
**Subject:** RE: Conference call 11:15 AM Florida time - Friday

Paul,

We will take care of the arrangements for tomorrow at 11:15 a.m. Thanks.

[REDACTED]

**From:** Paul Cassell [mailto:cassellp@law.utah.edu]  
**Sent:** Thursday, December 01, 2011 4:59 PM  
**To:** [REDACTED], [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Cc:** Brad Edwards; [REDACTED], [REDACTED] (USAFLS)  
**Subject:** RE: Conference call 11:15 AM Florida time - Friday

Hi all,

Does 11:15 AM Florida time on Friday work?

If so, please call my cell phone [REDACTED] as well as Brad – [REDACTED] can y'all initiate the conference call or set up a call in number?

Looking forward to chatting. PC

Paul G. Cassell

Ronald N. Boyce Presidential Professor of Criminal Law

S.J. Quinney College of Law at the University of Utah

332 South 1400 East, Room 101

Salt Lake City, UT 84112-0730

Voice: [REDACTED]

Fax: [REDACTED]

Email: [cassellp@law.utah.edu](mailto:cassellp@law.utah.edu)

<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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**From:** [REDACTED], [REDACTED] [REDACTED] (USAFLS) [mailto:[REDACTED]]  
**Sent:** Thursday, December 01, 2011 2:34 PM  
**To:** [REDACTED], [REDACTED] (USAFLS); Paul Cassell  
**Cc:** Brad Edwards; [REDACTED], [REDACTED] (USAFLS)  
**Subject:** RE: Discovery Issues in Epstein - conference call at 5 PM today?

Hi everyone – Sorry, I am having a very busy duty week. Tomorrow I have court at 9:00 probably until 11:00 and then again from 3:00 until 5:00. I have a debriefing at 1:00, but I should be able to step out after 1:30. So, 11:15 or 1:30 are best for me, but your schedules take priority.

[REDACTED]  
Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

[REDACTED]  
Fax [REDACTED]

**From:** [REDACTED], [REDACTED] (USAFLS)  
**Sent:** Thursday, December 01, 2011 3:52 PM  
**To:** Paul Cassell  
**Cc:** Brad Edwards; [REDACTED], [REDACTED] [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Subject:** RE: Discovery Issues in Epstein - conference call at 5 PM today?

Unfortunately, that doesn't work for us today. Can we set up a time for tomorrow?

[REDACTED]

[REDACTED]  
Counselor to the United States Attorney

United States Attorney's Office

99 N.E. 4th Street, Suite 800

Miami, FL 33132

Telephone: [REDACTED]

E-mail: [REDACTED]

-----Original Message-----

From: Paul Cassell [<mailto:cassellp@law.utah.edu>]

Sent: Thursday, December 01, 2011 2:22 PM

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

Cc: Brad Edwards

Subject: RE: Discovery Issues in Epstein - conference call at 5 PM today?

Hi [REDACTED] and Co.,

Thanks for the call. Sorry I was on the other line.

Can we set up a time certain? That way Brad can participate.

He is in a depo until 4:30, but should be free at 5 PM your time today (Thursday). Does that work?

Looking forward to chatting. PC

Paul G. Cassell

Ronald N. Boyce Presidential Professor of Criminal Law

S.J. Quinney College of Law at the University of Utah

332 South 1400 East, Room 101

Salt Lake City, UT 84112-0730

Voice: [REDACTED]

Fax: [REDACTED]

Email: [cassellp@law.utah.edu](mailto:cassellp@law.utah.edu)

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-----Original Message-----

From: Paul Cassell

Sent: Thursday, December 01, 2011 11:25 AM

To: '██████████, ██████████ ██████████ ██████████' (USAFLS); '██████████, ██████████ ██████████ ██████████' (USAFLS); '██████████, ██████████ ██████████' (USAFLS)

Cc: 'Brad Edwards'

Subject: RE: Discovery Issues in Epstein

Dear Mr. ██████████,

We will shortly be filing a motion to compel Government responses to our discovery requests -- discovery which, as you know, Judge Marra has already ordered. We realize, of course, that the Government has filed a motion to dismiss/stay. But if the Government's position is rejected on those motions, then the next issue is what discovery can we expect to receive from the Government.

If the motions are denied, will the Government voluntarily produce anything to us? Will the government at least agree to produce the following:

- (1) The Government's initial disclosures pursuant to Fed. R. Civ. P. 26;
- (2) Answers to all of the victims' requests for admission;
- (3) All documents, correspondence, and other information that the Government distributed to persons or entities outside of the federal Government or received from persons or entities outside of the federal government; and

(4) All documents, correspondence, and other information covered by the victims' discovery request that is not subject to a claim of privilege.

And, for all other information withheld, will the Government agree to produce a document-by-document privilege log, as required by the local rules?

Thanks for your help on these questions and Brad and I have.

Sincerely,

Paul Cassell

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

Paul G. Cassell

Ronald N. Boyce Presidential Professor of Criminal Law S.J. Quinney College of Law at the University of Utah

332 South 1400 East, Room 101

Salt Lake City, UT 84112-0730

Voice: [REDACTED]

Fax: [REDACTED]

Email: [REDACTED]

<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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-----  
**From:** [REDACTED], [REDACTED] (USAFLS) <ESanchez1@usa.doj.gov>

-----  
**From:** [REDACTED], [REDACTED] (USAFLS) [REDACTED]  
**Sent:** Thursday, December 01, 2011 4:34 PM  
**To:** [REDACTED], [REDACTED] (USAFLS); Paul Cassell  
**Cc:** Brad Edwards; [REDACTED], [REDACTED] (USAFLS)  
**Subject:** RE: Discovery Issues in Epstein - conference call at 5 PM today?

Hi everyone – Sorry, I am having a very busy duty week. Tomorrow I have court at 9:00 probably until 11:00 and then again from 3:00 until 5:00. I have a debriefing at 1:00, but I should be able to step out after 1:30. So, 11:15 or 1:30 are best for me, but your schedules take priority.

A. [REDACTED] Villafaña

Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

[REDACTED]  
Fax [REDACTED]

**From:** [REDACTED], [REDACTED] (USAFLS)  
**Sent:** Thursday, December 01, 2011 3:52 PM  
**To:** Paul Cassell  
**Cc:** Brad Edwards; [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Subject:** RE: Discovery Issues in Epstein - conference call at 5 PM today?

Unfortunately, that doesn't work for us today. Can we set up a time for tomorrow?

[REDACTED]



332 South 1400 East, Room 101

Salt Lake City, UT 84112-0730

Voice: [REDACTED]

Fax: [REDACTED]

Email: [pcassell@law.utah.edu](mailto:pcassell@law.utah.edu)

<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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-----Original Message-----

From: Paul Cassell

Sent: Thursday, December 01, 2011 11:25 AM

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

Cc: 'Brad Edwards'

Subject: RE: Discovery Issues in Epstein

Dear Mr. [REDACTED],

We will shortly be filing a motion to compel Government responses to our discovery requests -- discovery which, as you know, Judge Marra has already ordered. We realize, of course, that the Government has filed a motion to dismiss/stay. But if the Government's position is rejected on those motions, then the next issue is what discovery can we expect to receive from the Government.

If the motions are denied, will the Government voluntarily produce anything to us? Will the government at least agree to produce the following:

- (1) The Government's initial disclosures pursuant to Fed. R. Civ. P. 26;
- (2) Answers to all of the victims' requests for admission;
- (3) All documents, correspondence, and other information that the Government distributed to persons or entities outside of the federal Government or received from persons or entities outside of the federal government; and
- (4) All documents, correspondence, and other information covered by the victims' discovery request that is not subject to a claim of privilege.

And, for all other information withheld, will the Government agree to produce a document-by-document privilege log, as required by the local rules?

Thanks for your help on these questions and Brad and I have.

Sincerely,

Paul Cassell

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

Paul G. Cassell

Ronald N. Boyce Presidential Professor of Criminal Law S.J. Quinney College of Law at the University of Utah

332 South 1400 East, Room 101

Salt Lake City, UT 84112-0730

Voice: [REDACTED]

Fax: [REDACTED]

Email: [REDACTED]

<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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-----  
**From:** [REDACTED], [REDACTED] [REDACTED] (USAFLS) <[REDACTED]>  
**Sent:** Thursday, December 01, 2011 6:00 PM  
**To:** [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Subject:** FW: JANE DOE #1 and JANE DOE#2 vs. US  
**Attachments:** Doe\_1st\_Req4Admissions\_to\_US.pdf

Look what I received by email today!

[REDACTED]  
Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

[REDACTED]  
Fax [REDACTED]

**From:** Maria Kelljchian [mailto:[REDACTED]]  
**Sent:** Thursday, December 01, 2011 4:55 PM  
**To:** [REDACTED], [REDACTED] [REDACTED] (USAFLS)  
**Cc:** Brad Edwards; 'Paul Cassell'  
**Subject:** JANE DOE #1 and JANE DOE#2 vs. US

Please see attached. Mailed out today.

Thank you,

Maria

**Maria W. Kelljchian**

**Farmer, Jaffe, Weissing,**

**Edwards, Fistos & Lehrman, P.L.**

425 North Andrews Avenue, Suite 2

Fort Lauderdale, Florida 33301

[REDACTED]

[REDACTED] fax

[REDACTED]

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---

**From:** [REDACTED], [REDACTED] (USAFLS) [REDACTED] >  
**Sent:** Thursday, December 01, 2011 5:24 PM  
**To:** Paul Cassell; [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Cc:** Brad Edwards  
**Subject:** RE: Conference call 11:15 AM Florida time - Friday

Paul,

We will take care of the arrangements for tomorrow at 11:15 a.m. Thanks.

[REDACTED]

**From:** Paul Cassell [mailto:cassellp@law.utah.edu]  
**Sent:** Thursday, December 01, 2011 4:59 PM  
**To:** [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Cc:** Brad Edwards; [REDACTED], [REDACTED] (USAFLS)  
**Subject:** RE: Conference call 11:15 AM Florida time - Friday

Hi all,

Does 11:15 AM Florida time on Friday work?

If so, please call my cell phone [REDACTED] as well as Brad – [REDACTED] can y'all initiate the conference call or set up a call in number?

Looking forward to chatting. PC

Paul G. Cassell

Ronald N. Boyce Presidential Professor of Criminal Law

S.J. Quinney College of Law at the University of Utah

332 South 1400 East, Room 101

Salt Lake City, UT 84112-0730

Voice: [REDACTED]

Fax: [REDACTED]

Email: [REDACTED]

<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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

**Sent:** Thursday, December 01, 2011 2:34 PM

**To:** [REDACTED], [REDACTED] (USAFLS); Paul Cassell

**Cc:** Brad Edwards; [REDACTED], [REDACTED] (USAFLS)

**Subject:** RE: Discovery Issues in Epstein - conference call at 5 PM today?

Hi everyone – Sorry, I am having a very busy duty week. Tomorrow I have court at 9:00 probably until 11:00 and then again from 3:00 until 5:00. I have a debriefing at 1:00, but I should be able to step out after 1:30. So, 11:15 or 1:30 are best for me, but your schedules take priority.

[REDACTED]  
Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

[REDACTED]  
Fax [REDACTED]

**From:** [REDACTED], [REDACTED] (USAFLS)

**Sent:** Thursday, December 01, 2011 3:52 PM

**To:** Paul Cassell

**Cc:** Brad Edwards; [REDACTED], [REDACTED] [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)

**Subject:** RE: Discovery Issues in Epstein - conference call at 5 PM today?

Unfortunately, that doesn't work for us today. Can we set up a time for tomorrow?

[REDACTED]

[REDACTED] *I. Sánchez*

**Counselor to the United States Attorney**

**United States Attorney's Office**

**99 N.E. 4th Street, Suite 800**

**Miami, FL 33132**

**Telephone:** [REDACTED]

**E-mail:** [REDACTED]

-----Original Message-----

From: Paul Cassell [mailto:████████████████████]  
Sent: Thursday, December 01, 2011 2:22 PM  
To: ██████████, ██████████ (USAFLS); ██████████, ██████████ (USAFLS); ██████████, ██████████ (USAFLS)  
Cc: Brad Edwards  
Subject: RE: Discovery Issues in Epstein - conference call at 5 PM today?

Hi ██████████ and Co.,

Thanks for the call. Sorry I was on the other line.

Can we set up a time certain? That way Brad can participate.

He is in a depo until 4:30, but should be free at 5 PM your time today (Thursday). Does that work?

Looking forward to chatting. PC

Paul G. Cassell

Ronald N. Boyce Presidential Professor of Criminal Law

S.J. Quinney College of Law at the University of Utah

332 South 1400 East, Room 101

Salt Lake City, UT 84112-0730

Voice: ██████████

Fax: ██████████

Email: [cassellp@law.utah.edu](mailto:cassellp@law.utah.edu)

<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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-----Original Message-----

From: Paul Cassell

Sent: Thursday, December 01, 2011 11:25 AM

To: '██████████, ██████████ ██████████ ██████████' (USAFLS); '██████████, ██████████ ██████████ ██████████' (USAFLS); '██████████, ██████████ ██████████' (USAFLS)

Cc: 'Brad Edwards'

Subject: RE: Discovery Issues in Epstein

Dear Mr. ██████████,

We will shortly be filing a motion to compel Government responses to our discovery requests -- discovery which, as you know, Judge Marra has already ordered. We realize, of course, that the Government has filed a motion to dismiss/stay. But if the Government's position is rejected on those motions, then the next issue is what discovery can we expect to receive from the Government.

If the motions are denied, will the Government voluntarily produce anything to us? Will the government at least agree to produce the following:

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- (2) Answers to all of the victims' requests for admission;
- (3) All documents, correspondence, and other information that the Government distributed to persons or entities outside of the federal Government or received from persons or entities outside of the federal government; and
- (4) All documents, correspondence, and other information covered by the victims' discovery request that is not subject to a claim of privilege.

And, for all other information withheld, will the Government agree to produce a document-by-document privilege log, as required by the local rules?

Thanks for your help on these questions and Brad and I have.

Sincerely,

Paul Cassell

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

Paul G. Cassell

Ronald N. Boyce Presidential Professor of Criminal Law S.J. Quinney College of Law at the University of Utah

332 South 1400 East, Room 101

Salt Lake City, UT 84112-0730

Voice: [REDACTED]

Fax: [REDACTED]

Email: [cassellp@law.utah.edu](mailto:cassellp@law.utah.edu)

<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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-----  
**From:** [REDACTED], [REDACTED] (USAFLS) <ESanchez1@usa.doj.gov>  
**Sent:** Wednesday, January 04, 2012 8:27 PM  
**To:** [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Subject:** Jane Doe litigation

[REDACTED] & [REDACTED]:

Can you confirm that the plaintiffs in the cases cited below are the petitioners in our CVRA matter?

First Am. Compl. ¶¶ 32-33, *Doe v. Epstein*, Case No. 08-80893-CIV-MARRA (“assert[ing] a cause of action against the Defendant, Jeffrey Epstein, pursuant to [18 U.S.C. § 2255] and the [Non-Prosecution] agreement between the Defendant, Jeffrey Epstein, and the United States Government”); Compl. ¶¶ 19-20, *L.M. v. Epstein*, Case No. 09-81092-CIV-Cohn (asserting that plaintiff was “covered by” provisions of the Non-Prosecution Agreement between the government and Epstein and that Epstein was thus “estopped by his plea and agreement with the Federal Government from denying the acts alleged in [the] Complaint, and must effectively admit liability to the Plaintiff, L.M., including admitting liability for all counts enumerated in this Complaint”)

Thanks,

■

-----  
**From:** ■, ■ (USAFLS) <AVillafana@usa.doj.gov>  
**Sent:** Friday, January 06, 2012 11:32 AM  
**To:** ■, ■ (USAFLS); ■, ■ (USAFLS)  
**Subject:** RE: Replies and Responses Due on January 6, 2012

I think there may be at least one motion that is fully briefed that wasn't addressed at the hearing – Epstein's Motion to Intervene. I will look at the docket sheet and figure this out. I still think that we are beyond the 90 days + 14, so let me check.

A. ■ Villafaña

Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

■

Fax ■

**From:** ■, ■ (USAFLS)  
**Sent:** Friday, January 06, 2012 10:52 AM  
**To:** ■, ■ (USAFLS); ■, ■ (USAFLS)  
**Subject:** Re: Replies and Responses Due on January 6, 2012

Don't the 90-day notices only kick in after a motion is fully briefed?

**From:** Paul Cassell [mailto:cassellp@law.utah.edu]  
**Sent:** Friday, January 06, 2012 10:40 AM  
**To:** [REDACTED], [REDACTED] (USAFLS); Brad Edwards <bedwards@pathtojustice.com>  
**Cc:** [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED], [REDACTED] (USAFLS)  
**Subject:** RE: Replies and Responses Due on January 6, 2012

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

S.J. Quinney College of Law at the University of Utah

332 South 1400 East, Room 101

Salt Lake City, UT 84112-0730

Voice: [REDACTED]

Fax: [REDACTED]

Email: [cassellp@law.utah.edu](mailto:cassellp@law.utah.edu)

<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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**From:** [REDACTED], [REDACTED] (USAFLS) [mailto:[REDACTED]]  
**Sent:** Thursday, January 05, 2012 5:24 PM  
**To:** Paul Cassell; Brad Edwards  
**Cc:** [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED], [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.

[REDACTED] is preparing for an evidentiary hearing in a 28 [REDACTED]. 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 [REDACTED], with sporadic assistance from [REDACTED] and I, will be preparing the responses and replies.

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

[REDACTED]

**From:** █████, █████ (USAFLS)  
**Sent:** Thursday, December 01, 2011 11:00 AM  
**To:** █████, █████ (USAFLS); █████, █████ (USAFLS)  
**Subject:** RE: Telephone Conference re: Epstein & Jane Doe █████. Enited States

Shall we confer briefly at 1:30 to make sure we're on the same page and then call him? Is there any reason why we need to make this a scheduled conference call including Edwards, or should we just initiate the call to Cassell and let him decide if he wants to postpone it to bring in Edwards?

---

**From:** █████, █████ (USAFLS)  
**Sent:** Thursday, December 01, 2011 10:17 AM  
**To:** █████, █████ (USAFLS); █████, █████ (USAFLS)  
**Cc:** Greenberg, Benjamin (USAFLS)  
**Subject:** RE: Telephone Conference re: Epstein & Jane Doe █████. Enited States

Yes, I think we need to call him. Do you want to try for 1:30 since we have the time already set aside?

A. █████ *Villafaña*

Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

██████████  
Fax ██████████

---

**From:** █████, █████ (USAFLS)  
**Sent:** Thursday, December 01, 2011 10:15 AM  
**To:** █████, █████ (USAFLS); █████, █████ (USAFLS)  
**Cc:** Greenberg, Benjamin (USAFLS)  
**Subject:** RE: Telephone Conference re: Epstein & Jane Doe █████. Enited States

I just received a call from █████ Bentley's assistant. Bentley is canceling today's conference call; he is feeling a little under the weather and is not coming into the office today. She told me that he will call me tomorrow to reschedule. Sorry. Given that it is unlikely that we are going to have a substantive discussion with Bentley this week, do you think we should reach out and call Cassell back before the week is over? I admit that thought is also making me feel a little bit under the weather.

---

**From:** █████, █████ (USAFLS)  
**Sent:** Wednesday, November 30, 2011 7:35 PM  
**To:** Bentley, █████ (USAFLM)

**Cc:** [REDACTED], [REDACTED] [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS); Greenberg, Benjamin (USAFLS)  
**Subject:** RE: Telephone Conference re: Epstein & Jane Doe [REDACTED] Enited States

[REDACTED]:

We're on for 1:30 tomorrow. I'll set things up for a conference call at that time and send out the call-in information.

Thanks,

[REDACTED]

---

**From:** [REDACTED], [REDACTED] (USAFLS)  
**Sent:** Tuesday, November 29, 2011 6:11 PM  
**To:** Bentley, [REDACTED] (USAFLM)  
**Cc:** [REDACTED], [REDACTED] [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS); Greenberg, Benjamin (USAFLS)  
**Subject:** Telephone Conference re: Epstein & Jane Doe [REDACTED] Enited States

Hi, [REDACTED].

I hope you had a great Thanksgiving.

As we had previously discussed, I am contacting you to see if we can set up a telephone conference to address some of the outstanding matters that we need to discuss to complete the transfer of the criminal case to your district and meet our obligations under USAP 3-2.170.001. (I also left a message with your assistant earlier today.) Those matters include: the nature and scope of any charges/investigation that may potentially remain viable in the SDFL following the entry of the Non-Prosecution Agreement; the need to advise the FBI in connection with the agents' pending requests for grand jury subpoenas and their expressed intent to continue investigating allegations against Epstein, advice which in all likelihood will require informing the FBI agents about other USAOs that might be able to assist them in light of the grand jury evidence previously obtained; and the handling of the criminal case file.

We ([REDACTED] Villafaña, who was previously assigned to the criminal investigation; [REDACTED] [REDACTED], who is handling the CVRA litigation; and me) can make ourselves available to confer with you after 10:30 tomorrow morning, tomorrow afternoon, or Thursday morning. If those blocks of time do not work, please let us know and we can make other arrangements to accommodate your schedule.

Thanks,

[REDACTED]

[REDACTED] *J. Sánchez*

Counselor to the United States Attorney

United States Attorney's Office

99 N.E. 4th Street, Suite 800

Miami, FL 33132

Telephone: [REDACTED]

E-mail: [REDACTED]

---

**From:** [REDACTED], [REDACTED] (USAFLS)  
**Sent:** Thursday, December 01, 2011 10:15 AM  
**To:** [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Cc:** Greenberg, Benjamin (USAFLS)  
**Subject:** RE: Telephone Conference re: Epstein & Jane Doe [REDACTED] United States

I just received a call from [REDACTED] Bentley's assistant. Bentley is canceling today's conference call; he is feeling a little under the weather and is not coming into the office today. She told me that he will call me tomorrow to reschedule. Sorry. Given that it is unlikely that we are going to have a substantive discussion with Bentley this week, do you think we should reach out and call Cassell back before the week is over? I admit that thought is also making me feel a little bit under the weather.

---

**From:** [REDACTED], [REDACTED] (USAFLS)  
**Sent:** Wednesday, November 30, 2011 7:35 PM  
**To:** Bentley, [REDACTED] (USAFLM)  
**Cc:** [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS); Greenberg, Benjamin (USAFLS)  
**Subject:** RE: Telephone Conference re: Epstein & Jane Doe [REDACTED] United States

■:

We're on for 1:30 tomorrow. I'll set things up for a conference call at that time and send out the call-in information.

Thanks,

■

---

**From:** ■, ■ (USAFLS)  
**Sent:** Tuesday, November 29, 2011 6:11 PM  
**To:** Bentley, ■ (USAFLM)  
**Cc:** ■, ■, ■. (USAFLS); ■, ■ (USAFLS); Greenberg, Benjamin (USAFLS)  
**Subject:** Telephone Conference re: Epstein & Jane Doe ■, United States

Hi, ■.

I hope you had a great Thanksgiving.

As we had previously discussed, I am contacting you to see if we can set up a telephone conference to address some of the outstanding matters that we need to discuss to complete the transfer of the criminal case to your district and meet our obligations under USAP 3-2.170.001. (I also left a message with your assistant earlier today.) Those matters include: the nature and scope of any charges/investigation that may potentially remain viable in the SDFL following the entry of the Non-Prosecution Agreement; the need to advise the FBI in connection with the agents' pending requests for grand jury subpoenas and their expressed intent to continue investigating allegations against Epstein, advice which in all likelihood will require informing the FBI agents about other USAOs that might be able to assist them in light of the grand jury evidence previously obtained; and the handling of the criminal case file.

We (■ Villafaña, who was previously assigned to the criminal investigation; ■ ■, who is handling the CVRA litigation; and me) can make ourselves available to confer with you after 10:30 tomorrow morning, tomorrow afternoon, or Thursday morning. If those blocks of time do not work, please let us know and we can make other arrangements to accommodate your schedule.

Thanks,

■

■ *J. Sánchez*

Counselor to the United States Attorney

United States Attorney's Office

99 N.E. 4th Street, Suite 800

Miami, FL 33132

Telephone: ■

E-mail:

[REDACTED]

---

**From:** ██████████, ██████████ (USAFLS)  
**Sent:** Thursday, December 01, 2011 10:15 AM  
**To:** ██████████, ██████████ ██████████ (USAFLS); ██████████, ██████████ (USAFLS)  
**Cc:** Greenberg, Benjamin (USAFLS)  
**Subject:** RE: Telephone Conference re: Epstein & Jane Doe ██████████ Enited States

I just received a call from ██████████ Bentley's assistant. Bentley is canceling today's conference call; he is feeling a little under the weather and is not coming into the office today. She told me that he will call me tomorrow to reschedule. Sorry. Given that it is unlikely that we are going to have a substantive discussion with Bentley this week, do you think we should reach out and call Cassell back before the week is over? I admit that thought is also making me feel a little bit under the weather.

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**To:** Bentley, ██████████ (USAFLM)  
**Cc:** ██████████, ██████████ ██████████ (USAFLS); ██████████, ██████████ (USAFLS); Greenberg, Benjamin (USAFLS)  
**Subject:** RE: Telephone Conference re: Epstein & Jane Doe ██████████ Enited States

██████████:

We're on for 1:30 tomorrow. I'll set things up for a conference call at that time and send out the call-in information.

Thanks,

██████████

---

**From:** ██████████, ██████████ (USAFLS)  
**Sent:** Tuesday, November 29, 2011 6:11 PM  
**To:** Bentley, ██████████ (USAFLM)  
**Cc:** ██████████, ██████████ ██████████ (USAFLS); ██████████, ██████████ (USAFLS); Greenberg, Benjamin (USAFLS)  
**Subject:** Telephone Conference re: Epstein & Jane Doe ██████████ Enited States

Hi, ██████████.

I hope you had a great Thanksgiving.

As we had previously discussed, I am contacting you to see if we can set up a telephone conference to address some of the outstanding matters that we need to discuss to complete the transfer of the criminal case to your district and meet our obligations under USAP 3-2.170.001. (I also left a message with your assistant earlier today.) Those matters include: the nature and scope of any charges/investigation that may potentially remain viable in the SDFL following the entry of the Non-Prosecution Agreement; the need to advise the FBI in connection with the agents' pending requests for grand jury subpoenas and their expressed intent to continue investigating allegations against Epstein, advice which in all likelihood will require informing the FBI agents about other USAOs that might be able to assist them in light of the grand jury evidence previously obtained; and the handling of the criminal case file.

We ([REDACTED] Villafaña, who was previously assigned to the criminal investigation; [REDACTED] [REDACTED], who is handling the CVRA litigation; and me) can make ourselves available to confer with you after 10:30 tomorrow morning, tomorrow afternoon, or Thursday morning. If those blocks of time do not work, please let us know and we can make other arrangements to accommodate your schedule.

Thanks,

[REDACTED]

[REDACTED] I. Sánchez

**Counselor to the United States Attorney**

**United States Attorney's Office**

**99 N.E. 4th Street, Suite 800**

**Miami, FL 33132**

**Telephone:** [REDACTED]

**E-mail:** [REDACTED]

---

**From:** Paul Cassell <cassellp@law.utah.edu>  
**Sent:** Thursday, December 01, 2011 1:25 PM  
**To:** [REDACTED], [REDACTED] [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Cc:** Brad Edwards  
**Subject:** RE: Discovery Issues in Epstein

Dear Mr. [REDACTED],

We will shortly be filing a motion to compel Government responses to our discovery requests -- discovery which, as you know, Judge Marra has already ordered. We realize, of course, that the Government has filed a motion to dismiss/stay. But if the Government's position is rejected on those motions, then the next issue is what discovery can we expect to receive from the Government.

If the motions are denied, will the Government voluntarily produce anything to us? Will the government at least agree to produce the following:

(1) The Government's initial disclosures pursuant to Fed. R. Civ. P. 26;

- (2) Answers to all of the victims' requests for admission;
- (3) All documents, correspondence, and other information that the Government distributed to persons or entities outside of the federal Government or received from persons or entities outside of the federal government; and
- (4) All documents, correspondence, and other information covered by the victims' discovery request that is not subject to a claim of privilege.

And, for all other information withheld, will the Government agree to produce a document-by-document privilege log, as required by the local rules?

Thanks for your help on these questions and Brad and I have.

Sincerely,

Paul Cassell  
Co-Counsel for Jane Doe #1 and Jane Doe #2

Paul G. Cassell  
Ronald N. Boyce Presidential Professor of Criminal Law  
S.J. Quinney College of Law at the University of Utah  
332 South 1400 East, Room 101  
Salt Lake City, UT 84112-0730  
Voice: [REDACTED]  
Fax: [REDACTED]  
Email: [cassellp@law.utah.edu](mailto:cassellp@law.utah.edu)  
<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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-----  
**From:** Paul Cassell <[cassellp@law.utah.edu](mailto:cassellp@law.utah.edu)>  
**Sent:** Thursday, December 01, 2011 12:49 PM  
**To:** [REDACTED], [REDACTED] [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Cc:** Brad Edwards  
**Subject:** RE: Redacted Pleading Rather than Sealing the Entire Pleading

Dear Mr. [REDACTED],

We haven't heard back from you on the issue regarding sealing of the Government's pleading in the Epstein case. (See email below sent earlier this week.) I was hoping that you (or Ms. [REDACTED] or Mr. [REDACTED]) could get back to Brad and me quickly on this issue.

As you know, we have a series of pleadings that we need to file on Monday. We are trying to understand the Government's position on sealing these pleadings.

As you also know, we think there is absolutely no basis for sealing the majority of the Government's pleadings. We hope you agree so that we can move forward consensually, at least on this issue.

Thank you in advance for your assistance.

Paul Cassell  
Co-Counsel for Jane Doe #1 and Jane Doe #2

Paul G. Cassell  
Ronald N. Boyce Presidential Professor of Criminal Law  
S.J. Quinney College of Law at the University of Utah  
332 South 1400 East, Room 101

Salt Lake City, UT 84112-0730

Voice: [REDACTED]

Fax: [REDACTED]

Email: [cassellp@law.utah.edu](mailto:cassellp@law.utah.edu)

<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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-----Original Message-----

From: Paul Cassell

Sent: Monday, November 28, 2011 2:29 PM

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

Cc: 'Brad Edwards'

Subject: RE: Redacted Pleading Rather than Sealing the Entire Pleading

Dear Mr. [REDACTED],

I am writing as co-counsel in the Jane Doe case. I understand that you are supervising the case for U.S. Attorney's Office there.

I am writing to request that the Government file new, redacted copies of its currently pending motion to dismiss and motion for stay. As you may know, the Government has filed these two motions entirely under seal. Yet the vast bulk of both motions do not deal with any material that needs to be under seal.

As you may know, Judge Marra has previously unsealed other pleadings in this case, recognizing the considerable public interest in the issues being discussed. As you also know, Jane Doe #1 and Jane Doe #2 have tried to work cooperatively with the Government wherever possible. For example, we earlier stipulated to proposed redactions of material proposed by Ms. [REDACTED] to avoid disclosing information that she viewed as confidential.

In light of all this, the victims are writing to inquire whether the Government would file a motion to place redacted copies of its two motions in the public court file in the case. Attached are two redacted pleadings that we believe remove all information that is properly subject to sealing to protect confidential grand jury material - but no more.

Please let me know whether the Government is willing to move forward on that basis.

Sincerely,

Paul Cassell

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

Paul G. Cassell

Ronald N. Boyce Presidential Professor of Criminal Law S.J. Quinney College of Law at the University of Utah

332 South 1400 East, Room 101

Salt Lake City, UT 84112-0730

Voice: [REDACTED]

Fax: [REDACTED]

Email: [cassellp@law.utah.edu](mailto:cassellp@law.utah.edu)

<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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-----  
**From:** Paul Cassell <[cassellp@law.utah.edu](mailto:cassellp@law.utah.edu)>

**Sent:** Thursday, December 01, 2011 2:22 PM

**To:** ██████████, ██████████, ██████████ (USAFLS); ██████████, ██████████ (USAFLS); ██████████, ██████████ (USAFLS)  
**Cc:** Brad Edwards  
**Subject:** RE: Discovery Issues in Epstein - conference call at 5 PM today?

Hi ██████████ and Co.,

Thanks for the call. Sorry I was on the other line.

Can we set up a time certain? That way Brad can participate.

He is in a depo until 4:30, but should be free at 5 PM your time today (Thursday). Does that work?

Looking forward to chatting. PC

Paul G. Cassell  
Ronald N. Boyce Presidential Professor of Criminal Law  
S.J. Quinney College of Law at the University of Utah  
332 South 1400 East, Room 101  
Salt Lake City, UT 84112-0730  
Voice: ██████████  
Fax: ██████████  
Email: [cassellp@law.utah.edu](mailto:cassellp@law.utah.edu)  
<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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-----Original Message-----

From: Paul Cassell  
Sent: Thursday, December 01, 2011 11:25 AM  
To: ██████████, ██████████, ██████████ (USAFLS); ██████████, ██████████ (USAFLS); ██████████, ██████████ (USAFLS)  
Cc: 'Brad Edwards'  
Subject: RE: Discovery Issues in Epstein

Dear Mr. ██████████,

We will shortly be filing a motion to compel Government responses to our discovery requests -- discovery which, as you know, Judge Marra has already ordered. We realize, of course, that the Government has filed a motion to dismiss/stay. But if the Government's position is rejected on those motions, then the next issue is what discovery can we expect to receive from the Government.

If the motions are denied, will the Government voluntarily produce anything to us? Will the government at least agree to produce the following:

- (1) The Government's initial disclosures pursuant to Fed. R. Civ. P. 26;
- (2) Answers to all of the victims' requests for admission;
- (3) All documents, correspondence, and other information that the Government distributed to persons or entities outside of the federal Government or received from persons or entities outside of the federal government; and
- (4) All documents, correspondence, and other information covered by the victims' discovery request that is not subject to a claim of privilege.

And, for all other information withheld, will the Government agree to produce a document-by-document privilege log, as required by the local rules?

Thanks for your help on these questions and Brad and I have.

Sincerely,

Paul Cassell  
Co-Counsel for Jane Doe #1 and Jane Doe #2

Paul G. Cassell  
Ronald N. Boyce Presidential Professor of Criminal Law S.J. Quinney College of Law at the University of Utah  
332 South 1400 East, Room 101  
Salt Lake City, UT 84112-0730  
Voice: [REDACTED]  
Fax: [REDACTED]  
Email: cassellp@law.utah.edu  
<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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---

**From:** [REDACTED], [REDACTED] (USAFLS) <ESanchez1@usa.doj.gov>  
**Sent:** Thursday, December 01, 2011 1:35 PM  
**To:** [REDACTED], [REDACTED], [REDACTED] (USAFLS)  
**Subject:** RE: Telephone Conference re: Epstein & Jane Doe [REDACTED] Enited States

Do you want to call us in my office? I still can't get through to your office.

---

**From:** [REDACTED], [REDACTED], [REDACTED] (USAFLS)  
**Sent:** Thursday, December 01, 2011 10:17 AM  
**To:** [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Cc:** Greenberg, Benjamin (USAFLS)  
**Subject:** RE: Telephone Conference re: Epstein & Jane Doe [REDACTED] Enited States

Yes, I think we need to call him. Do you want to try for 1:30 since we have the time already set aside?

A. [REDACTED] *Villafaña*

Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

week, do you think we should reach out and call Cassell back before the week is over? I admit that thought is also making me feel a little bit under the weather.

---

**From:** █████, █████ (USAFLS)  
**Sent:** Wednesday, November 30, 2011 7:35 PM  
**To:** Bentley, █████ (USAFLM)  
**Cc:** █████, █████ ██████. (USAFLS); █████, █████ (USAFLS); Greenberg, Benjamin (USAFLS)  
**Subject:** RE: Telephone Conference re: Epstein & Jane Doe █████. Enited States

█████:

We're on for 1:30 tomorrow. I'll set things up for a conference call at that time and send out the call-in information.

Thanks,

█████

---

**From:** █████, █████ (USAFLS)  
**Sent:** Tuesday, November 29, 2011 6:11 PM  
**To:** Bentley, █████ (USAFLM)  
**Cc:** █████, █████ ██████. (USAFLS); █████, █████ (USAFLS); Greenberg, Benjamin (USAFLS)  
**Subject:** Telephone Conference re: Epstein & Jane Doe █████. Enited States

Hi, █████.

I hope you had a great Thanksgiving.

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We (█████ Villafaña, who was previously assigned to the criminal investigation; █████ █████, who is handling the CVRA litigation; and me) can make ourselves available to confer with you after 10:30 tomorrow morning, tomorrow afternoon, or Thursday morning. If those blocks of time do not work, please let us know and we can make other arrangements to accommodate your schedule.

Thanks,

█████

█████ *J. Sánchez*

**From:** Paul Cassell <cassellp@law.utah.edu>  
**Sent:** Thursday, December 01, 2011 4:00 PM  
**To:** [REDACTED], [REDACTED] (USAFLS)  
**Cc:** Brad Edwards; [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Subject:** RE: Discovery Issues in Epstein - conference call at 5 PM today?

Am checking with Brad and will get back to you.

P.S. We may need an extra 5 pages to reply to the government's motion to dismiss. Any objection?  
PC

Paul G. Cassell

Ronald N. Boyce Presidential Professor of Criminal Law

S.J. Quinney College of Law at the University of Utah

332 South 1400 East, Room 101

Salt Lake City, UT 84112-0730

Voice: [REDACTED]

Fax: [REDACTED]

Email: [cassellp@law.utah.edu](mailto:cassellp@law.utah.edu)

<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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**From:** [REDACTED], [REDACTED] (USAFLS) [mailto:[REDACTED]]  
**Sent:** Thursday, December 01, 2011 1:52 PM  
**To:** Paul Cassell  
**Cc:** Brad Edwards; [REDACTED], [REDACTED] [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Subject:** RE: Discovery Issues in Epstein - conference call at 5 PM today?

Unfortunately, that doesn't work for us today. Can we set up a time for tomorrow?

[REDACTED]

[REDACTED] *J. Sánchez*

**Counselor to the United States Attorney**

**United States Attorney's Office**

**99 N.E. 4th Street, Suite 800**

**Miami, FL 33132**

**Telephone:** [REDACTED]

**E-mail:** [REDACTED]

-----Original Message-----

**From:** Paul Cassell [mailto:[cassellp@law.utah.edu](mailto:cassellp@law.utah.edu)]  
**Sent:** Thursday, December 01, 2011 2:22 PM  
**To:** [REDACTED], [REDACTED] [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Cc:** Brad Edwards  
**Subject:** RE: Discovery Issues in Epstein - conference call at 5 PM today?

Hi [REDACTED] and Co.,

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Looking forward to chatting. PC

Paul G. Cassell

Ronald N. Boyce Presidential Professor of Criminal Law

S.J. Quinney College of Law at the University of Utah

332 South 1400 East, Room 101

Salt Lake City, UT 84112-0730

Voice: [REDACTED]

Fax: [REDACTED]

Email: [cassellp@law.utah.edu](mailto:cassellp@law.utah.edu)

<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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-----Original Message-----

From: Paul Cassell

Sent: Thursday, December 01, 2011 11:25 AM

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

Cc: 'Brad Edwards'

Subject: RE: Discovery Issues in Epstein

Dear Mr. [REDACTED],

We will shortly be filing a motion to compel Government responses to our discovery requests -- discovery which, as you know, Judge Marra has already ordered. We realize, of course, that the Government has filed a motion to dismiss/stay. But if the Government's position is rejected on those motions, then the next issue is what discovery can we expect to receive from the Government.

If the motions are denied, will the Government voluntarily produce anything to us? Will the government at least agree to produce the following:

- (1) The Government's initial disclosures pursuant to Fed. R. Civ. P. 26;
- (2) Answers to all of the victims' requests for admission;
- (3) All documents, correspondence, and other information that the Government distributed to persons or entities outside of the federal Government or received from persons or entities outside of the federal government; and
- (4) All documents, correspondence, and other information covered by the victims' discovery request that is not subject to a claim of privilege.

And, for all other information withheld, will the Government agree to produce a document-by-document privilege log, as required by the local rules?

Thanks for your help on these questions and Brad and I have.

Sincerely,

Paul Cassell

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

Paul G. Cassell

Ronald N. Boyce Presidential Professor of Criminal Law S.J. Quinney College of Law at the University of Utah

332 South 1400 East, Room 101

Salt Lake City, UT 84112-0730

Voice: [REDACTED]

Fax: [REDACTED]

Email: [cassellp@law.utah.edu](mailto:cassellp@law.utah.edu)

<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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-----  
**From:** [REDACTED], [REDACTED] (USAFLS) <ESanchez1@usa.doj.gov>  
**Sent:** Thursday, December 01, 2011 3:52 PM  
**To:** Paul Cassell  
**Cc:** Brad Edwards; [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Subject:** RE: Discovery Issues in Epstein - conference call at 5 PM today?

Unfortunately, that doesn't work for us today. Can we set up a time for tomorrow?

[REDACTED]

[REDACTED] *J. Sánchez*

**Counselor to the United States Attorney**

**United States Attorney's Office**

**99 N.E. 4th Street, Suite 800**

**Miami, FL 33132**

**Telephone:** [REDACTED]

**E-mail:** [REDACTED]

-----Original Message-----

From: Paul Cassell [mailto:cassellp@law.utah.edu]

Sent: Thursday, December 01, 2011 2:22 PM

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

Cc: Brad Edwards

Subject: RE: Discovery Issues in Epstein - conference call at 5 PM today?

Hi [REDACTED] and Co.,

Thanks for the call. Sorry I was on the other line.

Can we set up a time certain? That way Brad can participate.

He is in a depo until 4:30, but should be free at 5 PM your time today (Thursday). Does that work?

Looking forward to chatting. PC

Paul G. Cassell

Ronald N. Boyce Presidential Professor of Criminal Law

S.J. Quinney College of Law at the University of Utah

332 South 1400 East, Room 101

Salt Lake City, UT 84112-0730

Voice: [REDACTED]

Fax: [REDACTED]

Email: cassellp@law.utah.edu

<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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To: '██████████, ██████████ ██████████ ██████████' (USAFLS); '██████████, ██████████ ██████████ ██████████' (USAFLS); '██████████, ██████████ ██████████' (USAFLS)

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Paul G. Cassell

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332 South 1400 East, Room 101

Salt Lake City, UT 84112-0730

Voice: [REDACTED]

Fax: [REDACTED]

Email: [cassellp@law.utah.edu](mailto:cassellp@law.utah.edu)

<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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**From:** Evelyn Sheehan [mailto:evelynbsheehan@gmail.com]  
**Sent:** Friday, December 09, 2011 11:20 AM  
**To:** Sheehan, Evelyn B. (USAFLS)  
**Subject:** Jeffrey Epstein lawyers want to depose Scott Rothstein

[http://www.dailybusinessreview.com/PubArticleDBR.jsp?id=1202534991568&Jeffrey\\_Epstein\\_lawyers\\_want\\_to\\_depose\\_Scott\\_Rothstein=&et=editorial&bu=Daily%20Business%20Review&cn=12.09.11&src=EMC-Email&pt=Daily%20am&kw=Jeffrey%20Epstein%20lawyers%20want%20to%20depose%20Scott%20Rothstein&slreturn=1](http://www.dailybusinessreview.com/PubArticleDBR.jsp?id=1202534991568&Jeffrey_Epstein_lawyers_want_to_depose_Scott_Rothstein=&et=editorial&bu=Daily%20Business%20Review&cn=12.09.11&src=EMC-Email&pt=Daily%20am&kw=Jeffrey%20Epstein%20lawyers%20want%20to%20depose%20Scott%20Rothstein&slreturn=1)

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---

**From:** [REDACTED], [REDACTED] (USAFLS) <AVillafana@usa.doj.gov>  
**Sent:** Friday, December 09, 2011 1:10 PM  
**To:** Sheehan, Evelyn B. (USAFLS)  
**Subject:** RE: Jeffrey Epstein lawyers want to depose Scott Rothstein

Thanks for the heads up. It is still going on and on and on for me.

A. [REDACTED] Villafaña

Assistant U.S. Attorney

**From:** Sheehan, Evelyn B. (USAFLS)  
**Sent:** Friday, December 09, 2011 11:22 AM  
**To:** [REDACTED], [REDACTED] [REDACTED]. (USAFLS)  
**Subject:** FW: Jeffrey Epstein lawyers want to depose Scott Rothstein

Endless...

**From:** Evelyn Sheehan [mailto:evelynbsheehan@gmail.com]  
**Sent:** Friday, December 09, 2011 11:20 AM  
**To:** Sheehan, Evelyn B. (USAFLS)  
**Subject:** Jeffrey Epstein lawyers want to depose Scott Rothstein

[http://www.dailybusinessreview.com/PubArticleDBR.jsp?id=1202534991568&Jeffrey\\_Epstein\\_lawyers\\_want\\_to\\_depose\\_Scott\\_Rothstein=&et=editorial&bu=Daily%20Business%20Review&cn=12.09.11&src=EMC-Email&pt=Daily%20am&kw=Jeffrey%20Epstein%20lawyers%20want%20to%20depose%20Scott%20Rothstein&slreturn=1](http://www.dailybusinessreview.com/PubArticleDBR.jsp?id=1202534991568&Jeffrey_Epstein_lawyers_want_to_depose_Scott_Rothstein=&et=editorial&bu=Daily%20Business%20Review&cn=12.09.11&src=EMC-Email&pt=Daily%20am&kw=Jeffrey%20Epstein%20lawyers%20want%20to%20depose%20Scott%20Rothstein&slreturn=1)

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---

**From:** ██████████, ██████████ (USAFLS) <ESanchez1@usa.doj.gov>  
**To:** ██████████, ██████████, ██████████ (USAFLS)  
**Sent:** Friday, December 09, 2011 1:25 PM  
**Subject:** Read: Jeffrey Epstein lawyers want to depose Scott Rothstein

Your message

**To:** ██████████, ██████████ (USAFLS)  
**Subject:** FW: Jeffrey Epstein lawyers want to depose Scott Rothstein  
**Sent:** Friday, December 09, 2011 1:10:01 PM (UTC-05:00) Eastern Time (US & Canada)

was read on Friday, December 09, 2011 1:24:33 PM (UTC-05:00) Eastern Time (US & Canada).

---

**From:** Sheehan, Evelyn B. (USAFLS) <esheehan@usa.doj.gov>  
**Sent:** Friday, December 09, 2011 2:23 PM  
**To:** ██████████, ██████████, ██████████ (USAFLS)  
**Subject:** Re: Jeffrey Epstein lawyers want to depose Scott Rothstein

That's nuts. Absolutely nuts. Facing similar nonsense in Rothstein and Tolz. Victims are eating each other alive while fighting for the pie of forfeited assets

---

**From:** ██████████, ██████████, ██████████ (USAFLS)  
**Sent:** Friday, December 09, 2011 02:08 PM  
**To:** Sheehan, Evelyn B. (USAFLS)  
**Subject:** RE: Jeffrey Epstein lawyers want to depose Scott Rothstein

I know. I don't think it will ever go away. And I was just telling someone that I don't really ever want to do a victim case again. Paul Cassell is actually asking for sanctions in a 6<sup>th</sup> Circuit case against a PSC prosecutor because the Appellate Division in DC decided to take a different position on appeal than the USAO did in the district court and did not confer with the victim. And then, on remand, they are going to ask that same PSC prosecutor to go into court and argue for a \$1 million restitution award!

A. ██████████ Villafañá

Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

**From:** Sheehan, Evelyn B. (USAFLS)  
**Sent:** Friday, December 09, 2011 1:38 PM  
**To:** [REDACTED], [REDACTED] [REDACTED] [REDACTED]. (USAFLS)  
**Subject:** Re: Jeffrey Epstein lawyers want to depose Scott Rothstein

Really? That's nuts. So demoralizing

**From:** [REDACTED], [REDACTED] [REDACTED] [REDACTED]. (USAFLS)  
**Sent:** Friday, December 09, 2011 01:10 PM  
**To:** Sheehan, Evelyn B. (USAFLS)  
**Subject:** RE: Jeffrey Epstein lawyers want to depose Scott Rothstein

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A. [REDACTED] *Villafaña*

Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

**From:** Evelyn Sheehan [mailto:evelynbsheehan@gmail.com]  
**Sent:** Friday, December 09, 2011 11:20 AM  
**To:** Sheehan, Evelyn B. (USAFLS)  
**Subject:** Jeffrey Epstein lawyers want to depose Scott Rothstein

[http://www.dailybusinessreview.com/PubArticleDBR.jsp?id=1202534991568&Jeffrey\\_Epstein\\_lawyers\\_want\\_to\\_depose\\_Scott\\_Rothstein=&et=editorial&bu=Daily%20Business%20Review&cn=12.09.11&src=EMC-Email&pt=Daily%20am&kw=Jeffrey%20Epstein%20lawyers%20want%20to%20depose%20Scott%20Rothstein&slreturn=1](http://www.dailybusinessreview.com/PubArticleDBR.jsp?id=1202534991568&Jeffrey_Epstein_lawyers_want_to_depose_Scott_Rothstein=&et=editorial&bu=Daily%20Business%20Review&cn=12.09.11&src=EMC-Email&pt=Daily%20am&kw=Jeffrey%20Epstein%20lawyers%20want%20to%20depose%20Scott%20Rothstein&slreturn=1)

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Rothstein, who is in protective custody, is serving a 50-year sentence at an undisclosed location.

-----  
**From:** Lavecchio, [REDACTED] (USAFLS) <LLavecchio@usa.doj.gov>  
**Sent:** Friday, December 09, 2011 2:58 PM  
**To:** [REDACTED], [REDACTED] [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Subject:** RE: Jeffrey Epstein lawyers want to depose Scott Rothstein

On December 2, attorney Joseph Ackerman contacted me in an attempt to get himself and Lily [REDACTED] cleared to participate in the Rothstein deposition. I thereafter sent him the following message:

Mr. Ackerman:

Due to the late date of your request, I was unable to obtain clearance from the U S. Marshal's Service for you or Ms. [REDACTED] to participate in the deposition of Scott Rothstein. Additionally, under the protocol established by Judge Ray, parties were required to obtain leave of the court in which litigation is pending to participate in the deposition and to cross-notice adverse parties. I am unaware as to whether that was done with reference to the Epstein litigation. I am copying this response to Chuck Lichtman, counsel to the Trustee in bankruptcy, who has largely organized this proceeding and who may be able to answer any other questions which you may have in this regard.

Sincerely,

Larry LaVecchio, AUSA

Lichtman responded to Ackerman as follows:

As I have explained, there will be a large number of parties already authorized to ask questions on discrete issues all of which are interrelated and will take nearly the full time allotted for the deposition. Everybody already feels they don't have enough allotted time for their respective cases. The topics to be discussed have nothing to do whatsoever with the claims existing regarding Jeffrey Epstein

Under the circumstances, the Marshal's Service is not going to allow the admittance of Epstein's attorneys.

**From:** [REDACTED], [REDACTED] [REDACTED] (USAFLS)  
**Sent:** Friday, December 09, 2011 1:10 PM  
**To:** [REDACTED], [REDACTED] (USAFLS); [REDACTED], [REDACTED] (USAFLS)  
**Cc:** Lavecchio, [REDACTED] (USAFLS)  
**Subject:** FW: Jeffrey Epstein lawyers want to depose Scott Rothstein

FYI – I assume they are trying to get some information on Brad Edwards.

Larry – are you handling this? I will be out next week. [REDACTED] and [REDACTED] are handling the Epstein matter, so can you keep them up to date on this?

A. [REDACTED] Villafaña

Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

[REDACTED]  
Fax [REDACTED]

**From:** Sheehan, Evelyn B. (USAFLS)

**Sent:** Friday, December 09, 2011 11:22 AM

**To:** [REDACTED], [REDACTED] [REDACTED] (USAFLS)

**Subject:** FW: Jeffrey Epstein lawyers want to depose Scott Rothstein

Endless...

**From:** Evelyn Sheehan [mailto:evelynbsheehan@gmail.com]

**Sent:** Friday, December 09, 2011 11:20 AM

**To:** Sheehan, Evelyn B. (USAFLS)

**Subject:** Jeffrey Epstein lawyers want to depose Scott Rothstein

[http://www.dailybusinessreview.com/PubArticleDBR.jsp?](http://www.dailybusinessreview.com/PubArticleDBR.jsp?id=1202534991568&Jeffrey_Epstein_lawyers_want_to_depose_Scott_Rothstein=&et=editorial&bu=Daily%20Business%20Review&cn=12.09.11&src=EMC-Email&pt=Daily%20am&kw=Jeffrey%20Epstein%20lawyers%20want%20to%20depose%20Scott%20Rothstein&slreturn=1)

[id=1202534991568&Jeffrey\\_Epstein\\_lawyers\\_want\\_to\\_depose\\_Scott\\_Rothstein=&et=editorial&bu=Daily%20Business%20Review&cn=12.09.11&src=EMC-](http://www.dailybusinessreview.com/PubArticleDBR.jsp?id=1202534991568&Jeffrey_Epstein_lawyers_want_to_depose_Scott_Rothstein=&et=editorial&bu=Daily%20Business%20Review&cn=12.09.11&src=EMC-Email&pt=Daily%20am&kw=Jeffrey%20Epstein%20lawyers%20want%20to%20depose%20Scott%20Rothstein&slreturn=1)

[Email&pt=Daily%20am&kw=Jeffrey%20Epstein%20lawyers%20want%20to%20depose%20Scott%20Rothstein&slreturn=1](http://www.dailybusinessreview.com/PubArticleDBR.jsp?id=1202534991568&Jeffrey_Epstein_lawyers_want_to_depose_Scott_Rothstein=&et=editorial&bu=Daily%20Business%20Review&cn=12.09.11&src=EMC-Email&pt=Daily%20am&kw=Jeffrey%20Epstein%20lawyers%20want%20to%20depose%20Scott%20Rothstein&slreturn=1)

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**From:** ██████████, ██████████ ██████████ (USAFLS) <AVillafana@usa.doj.gov>  
**Sent:** Friday, December 09, 2011 2:09 PM  
**To:** Sheehan, Evelyn B. (USAFLS)  
**Subject:** RE: Jeffrey Epstein lawyers want to depose Scott Rothstein

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**From:** Sheehan, Evelyn B. (USAFLS) <esheehan@usa.doj.gov>  
**To:** [REDACTED], [REDACTED] (USAFLS)  
**Sent:** Friday, December 09, 2011 2:21 PM  
**Subject:** Read: RE: Jeffrey Epstein lawyers want to depose Scott Rothstein

Your message

To: Sheehan, Evelyn B. (USAFLS)  
Subject: RE: Jeffrey Epstein lawyers want to depose Scott Rothstein  
Sent: Friday, December 09, 2011 2:08:37 PM (UTC-05:00) Eastern Time (US & Canada)

was read on Friday, December 09, 2011 2:21:04 PM (UTC-05:00) Eastern Time (US & Canada).