

**From:** "[REDACTED]" <[REDACTED]>

**To:** Paul Cassell <[REDACTED]>

**Cc:** Brad Edwards <[REDACTED]>

**Subject:** RE: CVRA case

**Date:** Tue, 12 Oct 2010 21:02:27 +0000

**Importance:** Normal

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Judge Cassell,

Please feel free to call me [REDACTED]. We don't have any problem with agreeing that a factual assertion is correct if we agree that is what occurred. However, the government does not agree that it violated the CVRA, or that plaintiffs are entitled to any relief.

I will be at the National Advocacy Center in Columbia, South Carolina, from October 17-21. I will have access to my e-mails but it may be difficult for me to respond quickly to what you send to me. Also, in determining whether your statement of facts is correct, I will need to consult with my colleague [REDACTED], who handled the Epstein matter.

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**From:** Paul Cassell [mailto:[REDACTED]]  
**Sent:** Tuesday, October 12, 2010 3:47 PM  
**To:** [REDACTED], [REDACTED] (USAFLS)  
**Cc:** Brad Edwards  
**Subject:** CVRA case

Hi [REDACTED] (if I may),

I believe we have communicated electronically before. As you probably know, I am co-counsel with Brad Edwards on the CVRA case concerning the Epstein (non) prosecution.

You will have seen Judge Marra's order today asking for us to explain the current situation on the CVRA case by October 23. By October 23, we plan to file a motion asking the court to declare that there were violations of the CVRA. We will be doing that on the basis of a set of fact in the case, of course.

I am writing to see if you would be interested in working with us on a stipulated set of facts? We will be in a position to give you a set of facts early to middle of next week. Would you be able to look at them quickly and let us know which facts are not dispute?

Thanks in advance for your cooperation on narrowing the factual issues in this case and any idea for helping the case to progress smoothly.

Sincerely,

Paul Cassell  
Counsel for Jane Does

Paul G. Cassell  
Ronald N. Boyce Presidential Professor of Criminal Law

[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

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