

From: Paul Cassell <[REDACTED]>
To: Paul Cassell <[REDACTED]>, "[REDACTED] (USAFLS)" <[REDACTED]>
Cc: Brad Edwards <[REDACTED]>, "[REDACTED] (USAFLS)" <[REDACTED]>

Subject: RE: Proposed Pleading to File - fixed a couple of sentences

Date: Wed, 27 Oct 2010 20:10:21 +0000

Importance: Normal

Attachments: response-order-show-cause-usattyrevision2.docx

[REDACTED]

I noticed that I missed a couple of sentences in the pleading I sent to you that made reference to the simultaneously filed declaration of Brad Edwards. This revision fixes those couple of sentences, making reference only to a soon-to-be filed declaration. Paul

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

[REDACTED]
Salt Lake City, UT 84112-0730

[REDACTED]

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

CONFIDENTIAL: This electronic message - along with any/all attachments - is confidential. This message is intended only for the use of the addressee. If you are not the intended recipient, the person responsible to deliver it to the intended recipient, you may not use, disseminate, distribute or copy this communication. If you have received this message in error, please immediately notify the sender by reply electronic mail and delete the original message. Thank you.

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

From: Paul Cassell
Sent: Wednesday, October 27, 2010 1:50 PM

[REDACTED]

Subject: RE: Proposed Pleading to File

THE FOLLOWING COMMUNICATION IS A SETTLEMENT OFFER WITHIN THE MEANING OF FEDERAL RULE OF EVIDENCE 408

[REDACTED]

Attached is proposed pleading that we would file, reflecting your request that we delay and reflecting your stipulation that the passage of time to this point has not prejudiced the U.S. Attorney's Office.

I want to continue to remind your office of its obligation to use its "best efforts" to protect the rights of crime victims. 19 USC 3771(c) (1). I trust that as you review our proposed pleading you will bear that requirement in mind.

I can be reached on my cell at [REDACTED]. As you know, we have to file today and are prepared to do so if we can't work something out. At the same time, we would like to work cooperatively with your office to bring Epstein to justice -- our revised pleadings are a step in that direction, while hopefully responding to the concerns that your Office has raised.

Paul Cassell
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
[REDACTED]

Salt Lake City, UT 84112-0730
[REDACTED]

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

CONFIDENTIAL: This electronic message - along with any/all attachments - is confidential. This message is intended only for the use of the addressee. If you are not the intended recipient, the person responsible to deliver it to the intended recipient, you may not use, disseminate, distribute or copy this communication. If you have received this message in error, please immediately notify the sender by reply electronic mail and delete the original message. Thank you.

-----Original Message-----
[REDACTED]

Sent: Monday, October 25, 2010 10:16 AM

To: Paul Cassell

Subject: Out of Office AutoReply: Conferring on Statement of Facts Before Wednesday's Filing

I will be on government travel from October 25-26, 2010. If you need to reach me, please call me at [REDACTED] Thanks.

EFTA00206680