

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

To: Lee, Dexter (USAFES) <Dexter.Lee@usdoj.gov>

Cc: Brad Edwards <brad@pathtojustice.com>, "**[REDACTED]**" <Ann.Marie.C.Villafana@usdoj.gov>

Subject: RE: Proposed Pleading to File

Date: Wed, 27 Oct 2010 19:49:47 +0000

Importance: Normal

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

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

[REDACTED]

Original Message

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.

EFTA00206716