

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

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

**Cc:** "[REDACTED] (USAFLS)" <[REDACTED]>

**Subject:** Possible Settlement/Other Details for Friday's Meeting

**Date:** Tue, 07 Dec 2010 17:40:46 +0000

**Importance:** Normal

**Attachments:** victim\_Proposed\_Joint\_Statement\_of\_Facts-forFridayproposal-1207-clean.docx;  
victim\_Proposed\_Joint\_Statement\_of\_Facts-forFridayproposal-1207.docx

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Hi [REDACTED],

Brad and I and our clients are looking forward to the meeting on Friday. We wanted to touch base with you on a couple of points:

1. I took the liberty of drafting what a possible settlement of the factual disputes might look like, along the lines of what Brad and I were discussing with you last week. It is in the attached document. (Note: there are two documents – first one is a “clean” document; the second one is a “redline” document, showing all the changes – but the redlining is getting somewhat cluttered, so I thought a new clean document would be helpful). We wanted to get this proposal to you well in advance of the Friday meeting so that your office could see a very specific settlement proposal from us that would both allow you to litigate the issue of pre-indictment application of the CVRA while at the same time avoiding the need for us to quarrel with you over specific factual issues. We trust your office will be prepared to meaningful discuss this good faith proposal from us on Friday – a proposal which we think would allow the US Attorney’s Office and the victims to properly become allies again rather than adversaries.
2. Could you tell us who you anticipate attending the meeting Friday from your office? Right now, we anticipate it will be Brad and me and likely [REDACTED] from our side.
3. Thanks for sending the 302 of [REDACTED] to Brad this morning. Are the 302s for our two other clients on the way? And what is the status on our request for other information/materials?
4. [REDACTED] would like to join our other two clients in the CVRA action. We are planning on filing a motion to that effect. We would like to indicate that the motion is not opposed. Do you have any opposition to such a motion?

Thanks for continuing the discussions on all this. We look forward to a productive meeting on Friday.

Paul Cassell  
Co-Counsel for the Victims

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

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