

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

To: [REDACTED]

Cc: Brad Edwards <bedwards@pathtojustice.com>

Subject: RE: extra pages

Date: Sun, 04 Dec 2011 18:55:18 +0000

Importance: Normal

Hey [REDACTED], and Ed,

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

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

[REDACTED]

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From: Lee, Dexter (USAFLS) [Dexter.Lee@usdoj.gov]

Sent: Thursday, December 01, 2011 3:23 PM

To: Paul Cassell [REDACTED]; Maria C. (USAFLS); Sanchez, Eduardo (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.

Dexter

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

Sent: Thursday, December 01, 2011 4:59 PM

To: [REDACTED]

Cc: Brad Edwards; Lee, Dexter (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 (801) 201-8271 as well as Brad – Ed/Dexter 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

[REDACTED]

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From: Vilefano, Ann Marie C. (USAFLS) [mailto:Ann.Marie.C.Vilefano@usdoj.gov]
Sent: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
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]

From: Sanchez, Eduardo (USAFLS) [mailto:Ed.Sanchez@usdoj.gov]
Sent: Thursday, December 01, 2011 3:52 PM
To: Paul Cassell
Cc: Brad Edwards; [REDACTED]
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?

Ed

[REDACTED]

Counselor to the United States Attorney
United States Attorney's Office
99 N.E. 4th Street, Suite 800
Miami, FL 33132
Telephone: 305-961-9057

[REDACTED]

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

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

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

To: [REDACTED] S)

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.

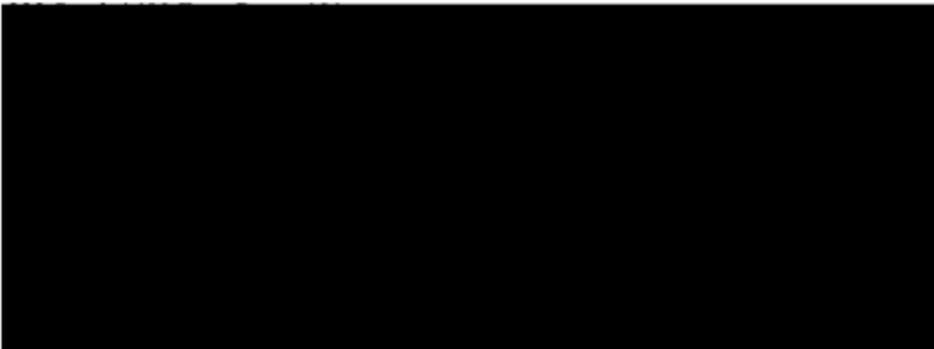
He is in a depo until 4:30, but should be free at 5 PM your time today (Thursday). Does that work?

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



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

From: Paul Cassell

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

To: ~~Willafer, Ann Marie C. (USAFLS); Sanchez, Eduardo (USAFLS); Lee, Denton (USAFLS)~~

Cc: 'Brad Edwards'

Subject: RE: Discovery Issues in Epstein

Dear Mr. ~~Sanchez,~~

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

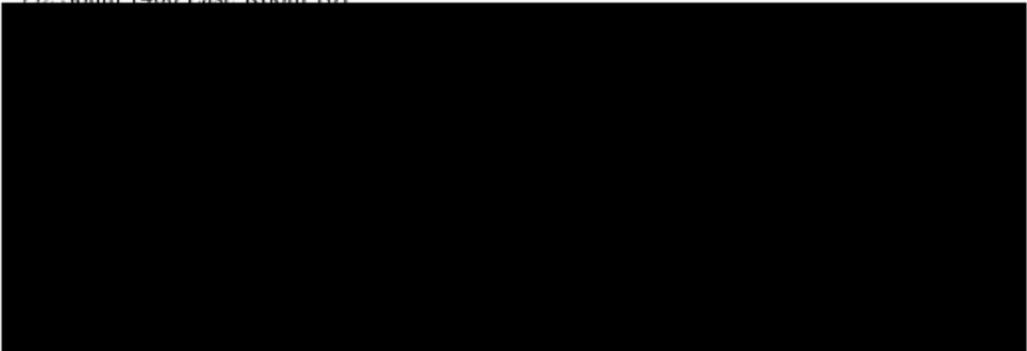
Co-Counsel for Jane Doe #1 and Jane Doe #2

Paul G. Cassell

EFTA00207932

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



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