

From: Paul Cassell <[REDACTED]>

To: "[REDACTED], [REDACTED], [REDACTED]. (USAFLS)" <[REDACTED]>, "[REDACTED], [REDACTED] (USAFLS)" <[REDACTED]>, "[REDACTED], [REDACTED] (USAFLS)" <[REDACTED]>

Cc: Brad Edwards <[REDACTED]>

Subject: RE: Discovery Issues in Epstein

Date: Thu, 01 Dec 2011 18:25:20 +0000

Importance: Normal

Dear Mr. [REDACTED],

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

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