

From: Paul Cassell <[REDACTED]>

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

Cc: Brad Edwards <[REDACTED]>

Subject: RE: Redacted Pleading Rather than Sealing the Entire Pleading

Date: Thu, 01 Dec 2011 17:48:54 +0000

Importance: Normal

Dear [REDACTED],

We haven't heard back from you on the issue regarding sealing of the Government's pleading in the Epstein case. (See email below sent earlier this week.) I was hoping that you (or [REDACTED]) could get back to Brad and me quickly on this issue.

As you know, we have a series of pleadings that we need to file on Monday. We are trying to understand the Government's position on sealing these pleadings.

As you also know, we think there is absolutely no basis for sealing the majority of the Government's pleadings. We hope you agree so that we can move forward consensually, at least on this issue.

Thank you in advance for your assistance.

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

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

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

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

From: Paul Cassell

Sent: Monday, November 28, 2011 2:29 PM

To: '[REDACTED]. (USAFLS)'; '[REDACTED] (USAFLS)'; '[REDACTED] (USAFLS)'

Cc: 'Brad Edwards'

Subject: RE: Redacted Pleading Rather than Sealing the Entire Pleading

Dear [REDACTED],

I am writing as co-counsel in the Jane Doe case. I understand that you are supervising the case for U.S. Attorney's Office there.

I am writing to request that the Government file new, redacted copies of its currently pending motion to dismiss and motion for stay. As you may know, the Government has filed these two motions entirely under seal. Yet the vast bulk of both motions do not deal with any material that needs to be under seal.

As you may know, Judge Marra has previously unsealed other pleadings in this case, recognizing the considerable public interest in the

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issues being discussed. As you also know, Jane Doe #1 and Jane Doe #2 have tried to work cooperatively with the Government wherever possible. For example, we earlier stipulated to proposed redactions of material proposed by [REDACTED] to avoid disclosing information that she viewed as confidential.

In light of all this, the victims are writing to inquire whether the Government would file a motion to place redacted copies of its two motions in the public court file in the case. Attached are two redacted pleadings that we believe remove all information that is properly subject to sealing to protect confidential grand jury material - but no more.

Please let me know whether the Government is willing to move forward on that basis.

Sincerely,

Paul Cassell
Co-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]
[REDACTED]
[REDACTED]
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