

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

[REDACTED]

**Cc:** Brad Edwards <bedwards@pathtojustice.com>

**Subject:** RE: Discovery Issues in Epstein - conference call at 5 PM today?

**Date:** Thu, 01 Dec 2011 19:22:27 +0000

**Importance:** Normal

[REDACTED]

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

[REDACTED]

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

From: Paul Cassell

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

To: 'Villafana, Ann Marie C. (USAFLS)'; 'Sanchez, Eduardo (USAFLS)'; 'Lee, Dexter (USAFLS)'

Cc: 'Brad Edwards'

Subject: RE: Discovery Issues in Epstein

[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.

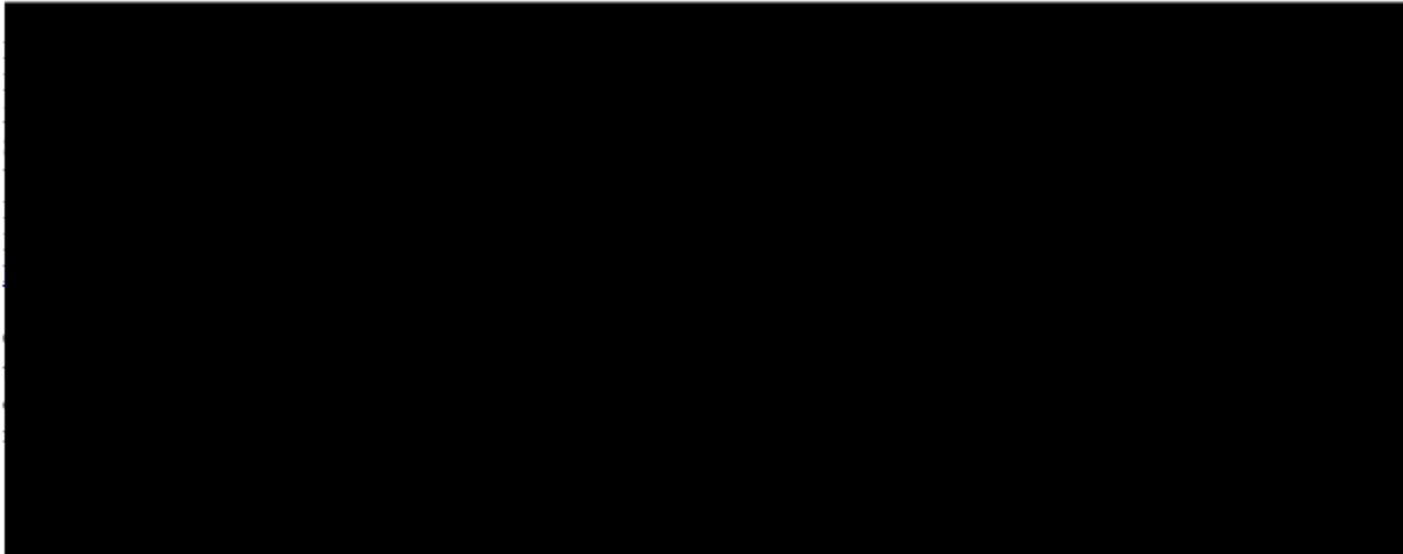
And, for all other information withheld, will the Government agree to produce a document-by-document privilege log, as required by the local rules?

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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