

[REDACTED]

Subject: RE: Conference call 11:15 AM Florida time - Friday

Date: Fri, 02 Dec 2011 01:18:46 +0000

Importance: Normal

[REDACTED] I am going to have to call in from the Igloo at the courthouse. If you can send me an email with all the info, I would appreciate it.

[REDACTED]

Sent: Thursday, December 01, 2011 5:24 PM

To: Paul Cassell; [REDACTED]

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.

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

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

Cc: Brad Edwards; [REDACTED]

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 [REDACTED] as well as Brad - [REDACTED] 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]

[REDACTED]

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[REDACTED]

Sent: Thursday, December 01, 2011 2:34 PM

[REDACTED] Paul Cassell

Cc: Brad Edwards; [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]

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?

[REDACTED]

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

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

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

[REDACTED]

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.

EFTA00208167

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

[REDACTED]

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

