

From: Brad Edwards <[REDACTED]>

To: "[REDACTED]", Paul Cassell [REDACTED]

Cc: "[REDACTED]" [REDACTED]

Subject: RE: (1) any more production; (2) VR materials

Date: Wed, 14 May 2014 16:56:09 +0000

Importance: Normal

Inline-Images: image001.png; image002.png; image007.jpg; image008.jpg

Hi [REDACTED],

First, I have reviewed all that has been produced and it is quite obvious (especially after comparing what was produced to us by Epstein in 2010) that there is a large volume of emails and other correspondence that has not been produced. So, preliminarily, can you give us a timetable on when you think you will be making that production?

Second, after reviewing everything, and given the tremendous respect I have for [REDACTED], I think it would be very beneficial to set up a conference call with at least the four of us very soon (no later than next week if possible). Ultimately I understand that we may need to involve others in the discussions but initially I am hopeful that we can accomplish a lot, just the four of us. If you are amenable, then please give us a few dates within the next week when you can talk.

Sincerely,



**Farmer, Jaffe, Weissing,
Edwards, Fistos & Lehrman, P.L.**

**Brad Edwards
Trial Attorney**

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brad@pathtojustice.com | www.pathtojustice.com



From: [REDACTED]

Sent: Wednesday, May 07, 2014 1:54 PM

To: Paul Cassell; Brad Edwards

Cc: [REDACTED]

Subject: RE: (1) any more production; (2) VR materials

Paul and Brad,

The government has not produced all the correspondence requested. I am working on correspondence between Epstein's attorneys and the Child Exploitation and Obscenity Unit, which I should be able to e-mail tomorrow. Marie is also working on additional material to be produced. Finally, there may be responsive materials from the DAG's office, which is different from what we produced to you on May 2, 2014.

I will check to see if we have any documents regarding Virginia Roberts.

From: Paul Cassell [REDACTED]
Sent: Wednesday, May 07, 2014 10:45 AM
To: [REDACTED] (USAFLS); Brad Edwards [REDACTED]
Subject: RE: (1) any more production; (2) VR materials

Dear [REDACTED]

We are writing for two reasons. First, we would like to confirm that you have produced all the correspondence that we have requested – that you're not contemplating any more production.

Second, we now represent [REDACTED] in her capacity as a crime victim. As such, we are requesting her 302's and all other information you have gathered with respect to her.

Thanks for your help on this.

Paul Cassell and Brad Edwards for Jane Doe #1, Jane Doe #2, and [REDACTED]

Paul G. Cassell
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 Salt Lake City, UT 84112-0730
Voice: [REDACTED] Fax: 801-581-6897 Email: [REDACTED]
<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

You can access my publications on <http://ssrn.com/author=30160>

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From: Paul Cassell
Sent: Monday, May 05, 2014 8:22 AM
To: Lee, Dexter (USAFLS); Brad Edwards ([REDACTED])
Subject: RE: Jane Does No. 1 and 2 [REDACTED] United States - Production of Documents - is one missing?

Hi [REDACTED]

Brad and I wanted to thank you for producing the correspondence last Friday. We're sure that was a lot of work, and we appreciate you getting that to us in a timely fashion.

Brad and I wanted to double check with you. The first file that we received was identified as RFP_2. We never received an RFP_1.

In total we received eight files, as the title of your email suggested we would. The eight were:

RFP_2
RFP_3_part_I
RFP_3_part_II
RFP_3_part_III
RFP_5_Redacted
RFP_8
RFP_19
RFP_mis

Should we have received anything else? Specifically, should we have received an RFP_1?

Thanks you in advance for clarifying this point. Brad and I are working on a filing in response to the Epstein Motion for Protective Order that we may need to file in the next 24 hours, so we'd appreciate clarity on this point soon.

Thanks again for all your help.

Paul Cassell and Brad Edwards 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
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[REDACTED] (phone)

[REDACTED] (fax)

You can access my publications on <http://ssrn.com/author=30160>

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From: [REDACTED]
Sent: Friday, May 02, 2014 1:35 PM
To: Paul Cassell; Brad Edwards ([REDACTED])
Subject: Jane Does No. 1 and 2 [REDACTED] United States - Production of Documents, One of Eight

Paul and Brad,

I will be sending you eight (8) files, broken into several e-mails. I have not gone through the Child Exploitation and Obscenity Section (CEOS) files, although I have included the May 15, 2008 letter from the CEOS Chief advising Epstein's attorneys that the United States Attorney was acting within his discretion in prosecuting the case. On the documents pertaining to Epstein's appeal to the Deputy Attorney General's Office, the documents produced are copies provided to our Office. There may be more at the Deputy Attorney General's Office, which has been notified of the Eleventh Circuit's decision.

Dexter