

From: Jackie Perczek <JPerczek@royblack.com>

To: Paul Cassell <cassellp@law.utah.edu>

"[REDACTED]"

"[REDACTED]" <owlmgw@att.ent>

<owlmgw@att.ent>, "Maria Kelljchian (maria@pathtojustice.com)"

<maria@pathtojustice.com>

Cc: "Brad Edwards (brad@pathtojustice.com)" <brad@pathtojustice.com>, "Marvin Simeon"

<MSimeon@royblack.com>

Subject: RE: Epstein's Request for Prospective Intervention -- no conference among the parties

Date: Wed, 10 Jul 2013 21:43:47 +0000

Importance: Normal

Hi Paul,

Thanks for reaching out to me. Because it is 5:41 p.m. here in Miami, I am not able to get back to you today but will get back to you tomorrow.

Jackie

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

Sent: Wednesday, July 10, 2013 5:40 PM

To: Jackie Perczek; [REDACTED]
owlmgw@att.ent; Maria Kelljchian (maria@pathtojustice.com)

Cc: Brad Edwards (brad@pathtojustice.com); Marvin Simeon

Subject: Epstein's Request for Prospective Intervention -- no conference among the parties

Dear Jackie,

We read with interest Epstein's recent motion for "Prospective Limited Intervention at the Remedy Stage of These Proceedings," DE 207. However, in reviewing the motion, we did not see the statement of Pre-Filing Conference, required by the Court's Local Rules. See Local Rule 7.1(A)(3). This requirement cannot be ignored, and we would like the opportunity to confer with you and the Government before responding.

Accordingly, one option for us would be to file a response to deny your motion for your failure to hold the appropriate conference with the parties. But another option would be for you schedule a conference with all three parties – i.e., the Epstein group, the Government, and victims' counsel – to discuss the issue. This would also provide an opportunity for us to determine what the Government's position is on this motion.

Please advise as to whether you agree that your motion is defective under the local rules and, if so, how you propose to remedy this defect.

In light of these additional complications, please also advise as to your position on whether you would oppose a ten-day extension of time (to and including August 6, 2013), for the victims to respond to the motion. (And Dexter – we would like your position on an extension as well.)

Thanks for your attention to these issues.

Brad Edwards and Paul Cassell for Jane Doe #1 and Jane Doe #2

