

From: "[REDACTED], [REDACTED] (USAFLS)" <[REDACTED]>
To: "[REDACTED], [REDACTED] (ODAG) (JMD)" <[REDACTED]>
Cc: "[REDACTED], [REDACTED], [REDACTED] (USAFLS)" <[REDACTED]>

Subject: FW: Discovery and VR materials
Date: Mon, 30 Jun 2014 14:53:05 +0000
Importance: Normal

Ms. [REDACTED],

Professor Cassell is asking for an estimate as to when the Government will be able to produce documents sought in the request for production, and he made specific reference to materials from the Deputy Attorney General's Office. We have already provided him the documents we received from the DAG's Office, when Epstein appealed his case to then Deputy Attorney General Mark Filip, in May-June 2008. There are likely other documents which the U.S. Attorney's Office did not receive, as they were sent directly to the DAG's Office.

When will you be able to complete your review of the responsive documents? Thanks.

[REDACTED]
[REDACTED]

From: Paul Cassell [mailto:[REDACTED]]
Sent: Thursday, June 26, 2014 8:43 AM
To: [REDACTED], [REDACTED] (USAFLS)
Cc: [REDACTED]; [REDACTED], [REDACTED], [REDACTED] (USAFLS)
Subject: RE: Discovery and VR materials

Hi [REDACTED],

Thanks very much for sending these materials. We appreciate what you sent and your time in tracking them down.

It is quite obvious that there is still much left to be produced. Please give us an estimate as to when those items will be produced, particular materials from the Department of Justice in Washington (i.e., the Deputy Attorney General's Office). As you know, we have been patient, and continue to be patient, but we need to know a true date for when the production will be complete. We think that we can all agree that now that the mandate has issued the production should be finalized immediately.

Thanks again for working on this. Paul and Brad

Paul G. Cassell
Ronald N. Boyce Presidential Professor of Criminal Law
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Salt Lake City, UT 84112-0730
[REDACTED] (phone)
[REDACTED] (fax)
[REDACTED]

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

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From: [REDACTED], [REDACTED] (USAFLS) [REDACTED]
Sent: Wednesday, June 25, 2014 4:37 PM
To: Paul Cassell
Cc: [REDACTED]; [REDACTED], [REDACTED], [REDACTED]. (USAFLS)
Subject: RE: Discovery and VR materials

Paul and Brad,

After our conference call, I went back through the e-mails and attempted to match up the production you received from Epstein. I have attached what I have located so far. On some of the e-mails, I have redacted the header and message, which is a forwarding of an e-mail from Epstein's attorney from one DOJ attorney to another. I did this because we are not waiving the attorney-client or attorney work product privileges in producing these e-mails. Deleting the header was quicker than trying to find the original message from Mr. Lefkowitz.

[REDACTED]

From: Paul Cassell [mailto:[REDACTED]]
Sent: Wednesday, June 25, 2014 5:49 PM
To: [REDACTED], [REDACTED] (USAFLS)
Cc: [REDACTED]; [REDACTED], [REDACTED], [REDACTED]. (USAFLS)
Subject: RE: Discovery and VR materials

Hi [REDACTED]

It's been a while now, and Brad and I were wondering when the Government's production of the court-ordered materials will be finalized. Brad and I would like to begin discussing a possible stipulation of facts. But of course we can't really begin that process until we know that the Government has delivered to us everything that it has been required to produce.

So – (1) When can we expect to have all the discovery materials to us? We hope it is soon.
(2) Have you been able to locate the 302's for [REDACTED]?

Thanks for your help on these things. Paul Cassell and Brad Edwards for Jane Doe #1, Jane Doe #2, and VR

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From: Paul Cassell
Sent: Tuesday, May 20, 2014 10:14 PM
To: [REDACTED], [REDACTED] (USAFLS)
Cc: [REDACTED]; Paul Cassell; [REDACTED], [REDACTED], [REDACTED]. (USAFLS)
Subject: Re: VR materials

I'm free as well. Cell is [REDACTED]. Paul

Paul Cassell - sent from my iPhone - please excuse brevity and errors.

On May 20, 2014, at 7:59 PM, "[REDACTED], [REDACTED] (USAFLS)" <[REDACTED]> wrote:

Thanks. Please excuse my typographical error. Tomorrow is May 21.

From: Brad Edwards [mailto:[REDACTED]]
Sent: Tuesday, May 20, 2014 09:54 PM
To: [REDACTED], [REDACTED] (USAFLS)
Cc: [REDACTED] <[REDACTED]>; [REDACTED], [REDACTED], [REDACTED] (USAFLS)
Subject: Re: VR materials

After 4:00 I can be reached on my cell. [REDACTED].

Sent from my iPhone

On May 20, 2014, at 9:44 PM, "[REDACTED], [REDACTED] (USAFLS)" <[REDACTED]> wrote:

Paul and Brad,
Are you available for a conference call tomorrow, May 22, after 3:00 pm, Eastern time? Thanks.

From: Paul Cassell [mailto:[REDACTED]]
Sent: Tuesday, May 20, 2014 12:54 PM
To: [REDACTED], [REDACTED] (USAFLS); Brad Edwards ([REDACTED]) <[REDACTED]>
Cc: [REDACTED], [REDACTED], [REDACTED] (USAFLS)
Subject: RE: VR materials

Hi [REDACTED]

I am writing to follow up and see if you were able to locate any materials about FBI interviews with [REDACTED]. We're not trying to create a lot of work here - just the FBI 302's (or comparable documents) for interviews with her. You indicated (below) you were going to check on that. Your help on this point would be greatly appreciated. Thanks!

Paul Cassell and Brad Edwards for [REDACTED]

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From: [REDACTED], [REDACTED] (USAFLS) [mailto:[REDACTED]]
Sent: Wednesday, May 07, 2014 11:54 AM
To: Paul Cassell; Brad Edwards ([REDACTED])
Cc: [REDACTED], [REDACTED], [REDACTED] (USAFLS)
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. [REDACTED] 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 [REDACTED].

[REDACTED]

From: Paul Cassell [[mailto:\[REDACTED\]](mailto:[REDACTED])]
Sent: Wednesday, May 07, 2014 10:45 AM
To: [REDACTED], [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: [REDACTED] Email: [REDACTED]

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

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From: Paul Cassell
Sent: Monday, May 05, 2014 8:22 AM
To: [REDACTED], [REDACTED] (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

EFTA00209290

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

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From: █████, █████ (USAFLS) [██████████]

Sent: Friday, May 02, 2014 1:35 PM

To: Paul Cassell; Brad Edwards (██████████)

Subject: Jane Does No. 1 and 2 █████. 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.

██████████