

[REDACTED]

**Subject:** RE: Proposed Schedule to Resolve CVRA Case within Twelve Months

**Date:** Thu, 13 Mar 2014 18:24:49 +0000

**Importance:** Normal

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Perhaps this could be the vehicle where we focus the Court and victim's attention on the legal issues that can be resolved on agreed facts without having to flesh out all of the irrelevant points Cassell wants to address regardless of the fact that they do not advance his client's legal claims? In other words, if we are going to compress the schedule, then the issues need to be narrowed for resolution. I think we need to make clear to the Court that doing everything that Cassell would like in a compressed timeframe would not constitute a reasonable schedule.

[REDACTED]

**Sent:** Thursday, March 13, 2014 2:10 PM

[REDACTED]

**Subject:** Proposed Schedule to Resolve CVRA Case within Twelve Months

[REDACTED]

This is an e-mail from Cassell suggesting that the parties might propose a schedule to Judge Marra to resolve the case within the next 12 months, since they believe the statute of limitations will expire by the end of that period.

The court has already acknowledged that it cannot order the government to prosecute Epstein. Even if the court finds the non-prosecution agreement was invalid because the CVRA had been violated, and sets it aside, the government still has the unfettered discretion to determine the appropriate action in the Epstein criminal case. If we don't agree to some proposed schedule, Cassell will again use that to argue how unreasonable the government is. I think the appropriate course would be to advise the Court the government will adhere to any reasonable time limits set by the Court, so we don't appear to be dragging our feet on purpose.

[REDACTED]

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

**Sent:** Thursday, March 13, 2014 1:50 PM

[REDACTED]

**Cc:** Brad Edwards ([brad@pathtojustice.com](mailto:brad@pathtojustice.com))

**Subject:** RE: thanks

[REDACTED]

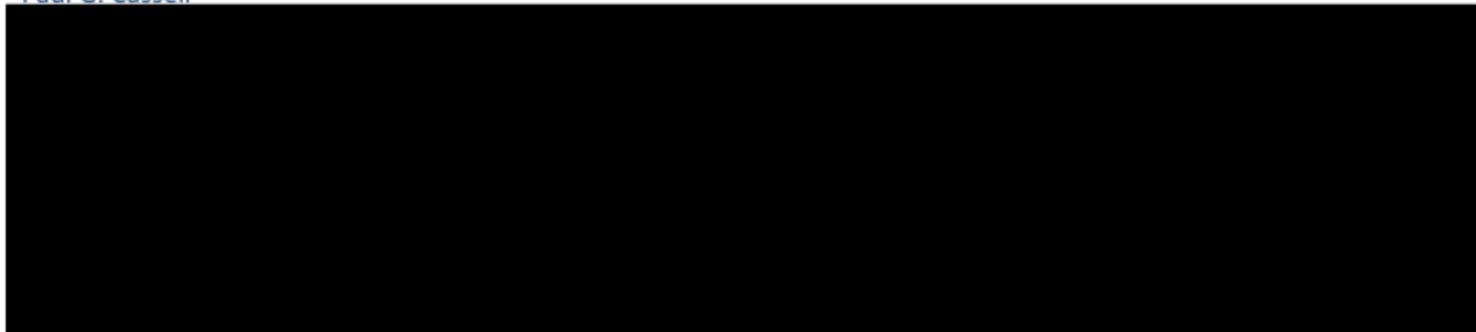
Thanks for the update – we look forward to hearing from EOUSA.

As mentioned on the phone, Brad and I may be in touch with you soon about a schedule that would bring the case to conclusion within the next twelve months or so, which would allow our clients to make a presentation to the appropriate prosecutors about indicting Epstein (should we be fortunate enough to prevail on our argument for invalidating the NPA) –

before the expiration of any applicable statute of limitations. We'd ask you to think about such a schedule that would work well from your perspective.

Thanks again for the acknowledgment. Paul

Paul G. Cassell



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**Sent:** Thursday, March 13, 2014 11:38 AM  
**To:** Paul Cassell  
**Cc:** Brad Edwards ([brad@pathtojustice.com](mailto:brad@pathtojustice.com))  
**Subject:** RE: Confirm receipt? please forward to Mr. Ferrer this letter about Reinhart

Paul,

I forwarded your letter regarding Bruce Rinehart to the U.S. Attorney on March 3, 2014, the day it was received. We determined your request was not a matter our Office should handle, as you anticipated in the last paragraph of your March 3 letter. Accordingly, your letter was forwarded to the General Counsel's Office, Executive Office for U.S. Attorneys, for a decision on what office your request should be referred.

I also received your previous e-mail regarding whether we would voluntarily provide to you the confidential, non-public information learned by former [REDACTED]. We will not.

Thank you.



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**From:** Paul Cassell [<mailto:cassellp@law.utah.edu>]  
**Sent:** Thursday, March 13, 2014 12:36 PM  
[REDACTED]  
**Cc:** Brad Edwards ([brad@pathtojustice.com](mailto:brad@pathtojustice.com))  
**Subject:** RE: Confirm receipt? please forward to Mr. Ferrer this letter about Reinhart



Can you confirm that you received the email below (and attached letter) from me?

Can you also confirm that you received an email from me the week previous, asking whether you would voluntarily provide information about the Reinhart situation?

I didn't get any acknowledgment from you, which was unusual. Just want to confirm that I sent those two emails to the correct email address.

Thanks! Paul

Paul G. Cassell



This message is intended only for the use of the addressee. If you have received this message in error, please immediately notify the sender by reply electronic mail and delete the original message. Professor Cassell is admitted to the Utah State Bar, but not the bars of other states. Thank you.

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**From:** Paul Cassell  
**Sent:** Monday, March 03, 2014 12:25 PM  
**Cc:** Brad Edwards ([brad@pathtojustice.com](mailto:brad@pathtojustice.com))  
**Subject:** please forward to Mr. Ferrer this letter about Reinhart



I was mailing the attached letter to Mr. Ferrer via regular mail. But it occurred to me it might be faster if I also emailed it to you, in the hope that you could then email it along to him. The letter requests an investigation of Bruce Reinhart's false statement. The letter also mentions that we have requested information from you about Reinhart's false statement, but so far we haven't been provided any such information. You will see that point on page 3 of the letter, which is a reference to an email I sent you letter. Please feel free to look at that sentence and let me know if that posture changes. I assume that you aren't going to provide any more information about Reinhart, but obviously hope that I am wrong about that.

In any event, thanks in advance for your help in forwarding this along to Mr. Ferrer.

Sincerely,

Paul Cassell for Jane Doe No. 1 and Jane Doe No. 2

Paul G. Cassell

