

[REDACTED]

Subject: Re: Lack of jurisdiction in the Eleventh Circuit

Date: Fri, 28 Jun 2013 16:37:07 +0000

Importance: Normal

It has been sent.

Thanks.

[REDACTED]

On Jun 28, 2013, at 12:09 PM, "Paul Cassell" <cassellp@law.utah.edu> wrote:

[REDACTED]

> Could you pass along our pleading to whoever else in the Department is considering how to proceed on Epstein's interlocutory appeal? We believe our pleading makes compelling arguments that the Eleventh Circuit lacks jurisdiction, at this time, over any such appeal. Thanks!

> Brad Edwards and Paul Cassell 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

> 332 South 1400 East, Room 101 Salt Lake City, UT 84112-0730

> Voice: 801-585-5202 Fax: 801-581-6897 Email: cassellp@law.utah.edu

> <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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[REDACTED]

> Sent: Friday, June 28, 2013 8:03 AM

> From: Paul Cassell

[REDACTED]

> Subject: Re: Extension of time re redaction

> Hi Paul:

> Thank you for being so accommodating.

EFTA00209822

> I know you worked up at Main, so I think you know that all appellate decisions are made by appellate attorneys. Dexter is handling getting an answer and will get back to you as soon as he can.

>

> Have a wonderful weekend. I am sure we will talk soon.

>

> Regards

> On Jun 28, 2013, at 9:38 AM, "Paul Cassell" <cassellp@law.utah.edu> wrote:

>

>>

>> We're happy to work with you on this, so we have no objection.

>>

>> But we were wondering when you would get back to us on our question (emailed to you yesterday morning) regarding the Government's position on Epstein's (frankly unprecedented) attempt to take an interlocutory appeal in the middle of this case. Is the Government going to oppose that effort? We would be very surprised if the Government wanted to set a precedent allowing suspected criminals to take interlocutory appeals in the middle of cases involving criminal proceedings. We'd like to know quickly, because we are filing very soon in opposition to the motion to stay.

>>

>> Paul and Brad for Jane Doe #1 and Jane Doe #2

>>

>> Paul G. Cassell

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>>

>> Subject: Extension of time re redaction

>>

>> Dear Paul and Brad:

>>

>> Good morning. I am writing to ask if you have any objection to a motion for a short extension of time to comply with Judge Marra's order requiring us to file unredacted pleadings. Some of those have Judge

Middlebrooks' sealed order attached and I need to file something with Judge Middlebrooks to avoid getting caught in the crosshairs. I am pretty sure that he is in town, so 5 days should suffice. If it will be longer than that, I will send a follow-up email.

>>

>> Thank you so much.

>>