

[REDACTED]

Subject: RE: motion to compel -- correct procedures ?

Date: Sat, 18 Jul 2015 00:01:51 +0000

Importance: Normal

Paul,

Thanks for sending this to us. We agree this is the correct procedural format for placing the issue before the Court, on whether the government is obligated to search for, and produce, information responsive to the supplemental requests for production we objected to, as well as responding to the supplemental requests for admission, which we objected to.

[REDACTED]

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

Sent: Wednesday, July 15, 2015 5:43 PM

[REDACTED]

Subject: RE: motion to compel -- correct procedures ?

[REDACTED]

Thanks for getting back to us earlier with with information about Dershowitz. We really appreciate it.

As we have discussed, Brad and I think we're entitled to your Dershowitz information -- of course, you disagree.

The next step now is how to present this issue to Judge Marra.

In the interest of avoiding unnecessary disputes, Brad and I wanted to share with you a DRAFT motion to compel. It is a draft -- and is still lacking some of the substantive arguments about why we think that Dershowitz information is relevant - - Brad and I are still working on that section of the motion. But we wanted to share the current draft with you now to make sure that we are making accurate representations about how you think this is the right vehicle to present these questions to the court. See pp. 1-2 and pp. 3-4 of attached draft.

Brad and I are hopeful that we will finish the draft in the next few days. We then plan to circulate to you, as well as to Epstein's and Dershowitz's lawyers to get their approval (or objection) to this procedure. But before going to them, we wanted to work together with you, so that the two parties to the case could have an agreed procedure -- before turning to prospective intervenors.

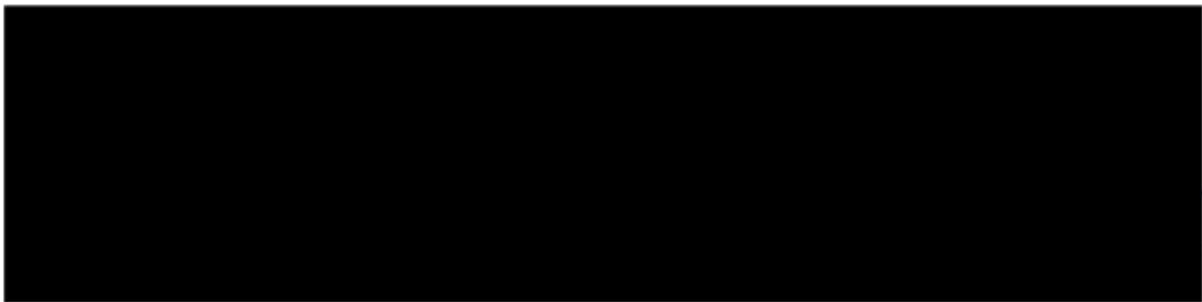
So -- bottom line -- understanding fully that you are not agreeing with any of our SUBSTANTIVE claims in this motion, are we moving forward PROCEDURALLY in the way the Government thinks is appropriate? If not, please let us know another way to proceed, so we can avoid objections.

Thanks again for your help.

Paul and Brad for the victims

[REDACTED]

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