

From: [REDACTED]

To: Paul Cassell [REDACTED] "Brad Edwards" [REDACTED]

Cc: [REDACTED]

Subject: RE: Meeting with Mr. Ferrer?

Date: Wed, 07 Jan 2015 19:40:48 +0000

Importance: Normal

Brad and Paul,

I will pass along your request. On another note, I asked the FBI FOIA Unit if they could respond to a FOIA request by e-mail, so we could get the documents into your hands more quickly. Unfortunately, they told me they do not have "eFOIA" capability, so they would be sending your response by mail. I took a chance and asked if they would be willing to send the response by overnight mail, if the requester was willing to bear the cost. I have not heard back yet. Would you be able or willing to provide a FEDEX number? Thanks.

[REDACTED]

From: Paul Cassell [REDACTED]
Sent: Wednesday, January 07, 2015 2:33 PM
To: [REDACTED] Brad Edwards [REDACTED]
Cc: [REDACTED]
Subject: RE: Meeting with Mr. Ferrer?

Hi [REDACTED]

First, Brad and I want to thank you for expediting the FOIA production. We really appreciate your help on this – if we can extend a similar courtesy to you on anything, please do not hesitate to ask.

Second, regarding our meeting – if [REDACTED] had authority to settle the case, then we'd be happy to meet with him. But our understanding from our previous meeting is that the CVRA case is being handled at the highest levels – by Mr. Ferrer in SDFla. The issues we would like to discuss will involve "global" issues in the CVRA case, so we would like to meet with Mr. Ferrer (unless [REDACTED] represents that he has full authority from Mr. Ferrer).

If the problem with meeting Mr. Ferrer is one of dates, we can try to work with Mr. Ferrer's schedule (I appreciate your consideration of mine). If the problem is pending filing deadlines, we would be happy to agree to an extension of time.

As you know, our request to meet with Mr. Ferrer has been bouncing around for a while – and given recent developments in the case, we believe a high-level meeting of the decisionmakers in the case is appropriate: i.e., Mr. Ferrer for the U.S. and Brad and me for the four victims.

I trust you can see our point of view on this. Of course, we understand you are just the messenger. Please advise if we can set up a meeting with Mr. Ferrer. We think our case is sufficiently important that a face to face meeting is appropriate.

Thanks for considering this request ... and for passing it along to Mr. Ferrer.

Paul Cassell and Brad Edwards for Janes Does 1 through 4

Paul G. Cassell

Ronald N. Boyce Presidential Professor of Criminal Law
S.J. Quinney College of Law at the University of Utah

[REDACTED]

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From: [REDACTED]
Sent: Wednesday, January 07, 2015 9:17 AM
To: Paul Cassell; Brad Edwards [REDACTED]
Cc: [REDACTED]
Subject: RE: 1. Meeting Prior to Filing Responses to Motions & 2. Status of FOIA request

Paul,

1. The meeting would be with [REDACTED] from the Executive Division [REDACTED] and me. Is 10:00 a.m., at the U.S. Attorney's Office, a good time?
2. I hope to have the FOIA materials to you by close of business today. I have asked the FBI FOIA Unit if they can make the disclosure to the requester, whom I assume is you, via e-mail, in order to expedite the process.

[REDACTED]

From: Paul Cassell [REDACTED]
Sent: Tuesday, January 06, 2015 11:41 PM
To: [REDACTED] Brad Edwards [REDACTED]
Cc: [REDACTED]
Subject: RE: 1. Meeting Prior to Filing Responses to Motions & 2. Status of FOIA request

Hi [REDACTED]

Thanks for getting back to us on this -- and thanks for your help on the FOIA request. I'm sure you can put yourself in our shoes and see the urgency of the situation.

1. Re Meeting: Thank you for working around my teaching schedule. The best day for us is Thursday, January 15. Before I buy plane tickets and Brad works around his schedule, we just want to be clear that this is for a meeting with Mr. Ferrer in addition to you and [REDACTED]. Obviously there are some high level issues we would like to discuss in person with Mr. Ferrer on behalf of all our clients.

Thursday morning would be ideal for me, as that would permit me to fly home Thursday afternoon. Is that good for Mr. Ferrer and you? If so, give us a time and place (Miami?).

2. Re: FOIA request -- how are the redactions coming along? Again, please put yourself in our position -- we really need to see those 302's as soon as possible. We've tried to extend as many courtesies as we could to y'all wherever we could. Could you please do whatever is possible at your end to ask the FBI get us those 302's. It's not clear to us why redactions of what Jane Doe #3 herself said to the FBI agents are needed, but we don't want to quibble. We just would like to see the 302's quickly.

Thanks again for your help -- our meeting next week is, again, in the spirit of trying to figure out what we can agree on.

Paul Cassell and Brad Edwards for Jane Does 1 through 4

Paul G. Cassell
Ronald N. Boyce Presidential Professor of Criminal Law
S.J. Quinney College of Law at the University of Utah

[REDACTED]

[REDACTED]

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From: [REDACTED]
Sent: Tuesday, January 06, 2015 4:17 PM
To: Paul Cassell; Brad Edwards [REDACTED]
Cc: [REDACTED]
Subject: Meeting Prior to Filing Responses to Motions

Paul and Brad,

The government's response to the initial motion for joinder in action is due on January 16, 2015. The government's response to Alan Dershowitz's motion for limited intervention is due on January 22, 2015. Earlier today, you requested that we meet before the government responses are filed. We can meet with you on Wednesday, January 14, or Thursday, January 15, 2015, in order to accommodate your teaching schedule.

Please let me know which date works best for both of you. Thanks.

[REDACTED]