

**From:** "[REDACTED] (USAFLS)" <[REDACTED]>  
**To:** "[REDACTED]. (USAFLS)" <[REDACTED]>, "[REDACTED] (USAFLS)" <[REDACTED]>, "[REDACTED]" <[REDACTED]>, "[REDACTED]. (USAFLS)" <[REDACTED]>  
**Cc:** "[REDACTED] (USAFLS)" <[REDACTED]>

**Subject:** FW: What is the status of our request for the 302s + meeting before filings

**Date:** Tue, 06 Jan 2015 15:10:17 +0000

**Importance:** Normal

**Inline-Images:** image001.png; image002.png; image003.jpg; image004.png

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[REDACTED],

This is the latest from Cassell. I contacted the FBI FOIA unit yesterday morning regarding any FOIA request from Cassell seeking FBI 302's for [REDACTED] [REDACTED]. At 11:15 am, they responded that they did have 302's responsive to the request, and would be willing to expedite the request if it would help us. I asked them to please do so. They did tell me that they would be redacting third party information from the 302's under the privacy exemptions in the FOIA. I take this to mean they will be redacting the names of persons [REDACTED] claimed sexually abused her. I will follow up with the FBI this morning.

Cassell also wants to meet with us before we file a response to their motion to add parties, and to Dershowitz's motion for limited intervention. The original motion to add was filed on December 30, 2014, which means our response is due on January 16, 2015. The corrected motion (D.E. 280) was filed on January 2, 2015, which means our response is due on January 20, 2015. Dershowitz's motion was filed on January 5, 2015, so our response is due on January 22, 2015.

Since a meeting during the week of January 19-23 is not possible due to scheduling conflicts, we were looking at meeting on January 28 or 29, which would be after all our responses are due. We can discuss this more at our 3:00 pm meeting. Thanks.

[REDACTED]

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**From:** Paul Cassell [REDACTED]  
**Sent:** Tuesday, January 06, 2015 8:35 AM  
**To:** [REDACTED] (USAFLS); Brad Edwards  
**Subject:** RE: What is the status of our request for the 302s + meeting before filings

Hi [REDACTED]

1. Sorry to keep pushing this -- but time is of the essence. When will he hear from your office on whether you will release to us Jane Doe #3's FBI 302's (particularly from the [REDACTED] interview)? We are contemplating additional pleadings on this issue, but don't want to have to spend time on the issue if you are going to agree. Please let us know promptly what the situation is on this.
2. We would also request that our meeting with the USAO that you are working to schedule take place BEFORE the USAO files any response to the our pending motion to add JD#3 to the case, as well as to Alan Dershowitz's motion to intervene. We would like for your Office to hear directly JD#3's position on these pending motions before making any filings. We trust this won't be a problem, and believe that we have right to such a meeting in any event under the CVRA's "right to confer".

Thanks in advance for your help on both of these points.

Paul Cassell and Brad Edwards for Jane Doe #3

Paul G. Cassell  
Ronald N. Boyce Presidential Professor of Criminal Law  
S.J. Quinney College of Law at the University of Utah  
332 S. 1400 E. , Room 101  
Salt Lake City, UT 84112-0730

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**From:** Paul Cassell  
**Sent:** Monday, January 05, 2015 5:55 PM  
**To:** [REDACTED] (USAFLS); Brad Edwards  
**Subject:** RE: Meeting in January 2015 + what is the status of our request for the 302s

Hi [REDACTED]

Yes, you got it right on the dates. Good days for me to meet are Wed Jan 21, Thurs Jan 22, Wed Jan 28, and Thurs Jan 29. In view of the current interest in the case, meeting sooner would be better than later. I know the 21<sup>st</sup> and 28<sup>th</sup> work for Brad.

What is the status of our request for the FBI 302's? If the Government is still going to hold them back, so be it. But this really seems like a fight that we don't need to have. Is there some way to get us an answer? Please run this up to the appropriate people. It really shouldn't be a problem to treat Jane Doe #3 the same way you all treated Jane Doe #1 and Jane Doe #2, can it? In any event, please just let us know as soon as you can. We would really appreciate your help on this.

Paul Cassell and Brad Edwards, co-counsel for Jane Does Nos. 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  
332 South 1400 East, Room 101 Salt Lake City, UT 84112-0730  
Voice: [REDACTED] [REDACTED] Email: [REDACTED]  
[REDACTED]

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**From:** [REDACTED] (USAFLS) [REDACTED]  
**Sent:** Monday, January 05, 2015 8:02 AM  
**To:** Paul Cassell; Brad Edwards  
**Subject:** RE: Meeting in January 2015

Paul and Brad,

If you are teaching on Monday afternoons, Tuesday mornings, and Friday mornings, it seems your best days for a meeting in Miami would be Wednesdays and Thursday. January 20 and 27 are Tuesdays. I assumed you meant January 21 and 28, and have sent those dates to the Executive Division as proposed meeting dates.

I am also working on your request for the FBI 302's.

[REDACTED]

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**From:** Paul Cassell [REDACTED]  
**Sent:** Friday, January 02, 2015 11:43 AM  
**To:** Brad Edwards; [REDACTED] (USAFLS)  
**Subject:** RE: Meeting in January 2015

Hi [REDACTED]

As Brad mentioned, it's a bit tricky for me to get out there and back. The best days for me are Wednesday Jan. 20 or Jan. 27 (any time, morning preferred). The second best days for me are Jan. 21 or Jan. 28, in the morning, so that I can fly home for class Friday morning.

Brad can chime in with any conflicts that he has. I have weird teaching schedule this semester, teaching Monday afternoon, Tuesday morning and Friday morning. I'm hoping to avoid having to cancel a class, but could do that if absolutely necessary.

Thanks! Paul

Paul G. Cassell  
Ronald N. Boyce Presidential Professor of Criminal Law  
S.J. Quinney College of Law at the University of Utah  
332 S. 1400 E. , Room 101  
Salt Lake City, UT 84112-0730

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

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**From:** Brad Edwards [REDACTED]  
**Sent:** Friday, January 02, 2015 8:32 AM  
**To:** [REDACTED] (USAFLS); Paul Cassell  
**Subject:** RE: Meeting in January 2015

[REDACTED]

The longer we wait to pick a date the more difficult it gets for Paul and [REDACTED] to make travel arrangements. We would like to make sure to meet sometime in January. Please get back to me.

Sincerely,



**Farmer, Jaffe, Weissing,  
Edwards, Fistos & Lehrman, P.L.**

**Brad Edwards  
Board Certified Trial Attorney**

425 North Andrews Avenue, Suite 2  
Fort Lauderdale, Florida 33301

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**From:** [REDACTED] (USAFLS) [REDACTED]  
**Sent:** Tuesday, December 23, 2014 6:19 PM  
**To:** Brad Edwards; Paul Cassell ([REDACTED])  
**Subject:** RE: Meeting in January 2015

Brad and Paul,

We will let you know which dates are good for us. We actually wanted to discuss adding the new parties to the case at the meeting. Our position is that we oppose adding new petitioners at this stage of the litigation.

Best Wishes for a wonderful holiday to you and your families.

[REDACTED]

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**From:** Brad Edwards [REDACTED]  
**Sent:** Monday, December 22, 2014 12:17 PM  
**To:** [REDACTED] (USAFLS); Paul Cassell ([REDACTED])  
**Subject:** RE: Meeting in January 2015

[REDACTED]

We have a few available dates to choose from. January 21-22 and 28-29. Hopefully one of those will work for you guys.

On the motion to add [REDACTED] and [REDACTED], I don't believe you indicated your position. As we said, we hoped you would agree, or at least not oppose, but either way we would like to know your position so that we can so inform the Court.

Thanks again. Please let me know which meeting date works best so that those coming from out of town can make arrangements.

Sincerely,



**Farmer, Jaffe, Weissing,  
 Edwards, Fistos & Lehrman, P.L.**

**Brad Edwards  
 Board Certified Trial Attorney**

425 North Andrews Avenue, Suite 2  
 Fort Lauderdale, Florida 33301

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**From:** [REDACTED] (USAFLS) [REDACTED]  
**Sent:** Tuesday, December 16, 2014 3:03 PM  
**To:** Brad Edwards; Paul Cassell ([REDACTED])  
**Subject:** Meeting in January 2015

Brad and Paul,

We would like to schedule a meeting with the Executive Division, as you requested, for January 2015, at a time convenient for both of you. Also, do [REDACTED] and [REDACTED] wish to attend?

Please let me know of a suitable time for all parties who wish to attend. Thanks.

[REDACTED]  
[REDACTED]