

From: Paul Cassell <[REDACTED]>
To: "[REDACTED]. (USAFLS)" <[REDACTED]>, "[REDACTED]. (USAFLS)" <[REDACTED]>, "[REDACTED]. (USAFLS)" <[REDACTED]>
Cc: Brad Edwards <[REDACTED]>

Subject: RE: motion for additional pages + Government position on three additional motions
Date: Wed, 04 Feb 2015 15:24:50 +0000
Importance: Normal

Hi [REDACTED]

1. We are planning on filing a motion for additional pages for our reply in support of JD3 and JD4's motion to intervene. We are requesting that you not oppose a motion for our reply not to exceed 18 pages. The additional pages are required because we have to discuss some complicated legal issues relevant to the statute of limitations issue you presented, including the "beyond the seas" tolling provision as well as the interaction of the 2401(a) and the applicable criminal statutes of limitations. We also have to discuss the issue of whether the CVRA contains a statute of limitations. Please advise if you will agree to this motion.

2. As you know, we sent a letter to Mr. Ferrer (with copy to you) regarding three motions that we are preparing to file. We were hoping to receive an answer today, as we will be required to state the Government's positions on the motions in our pleadings. Just wanted to double check on that and see if we will be able to receive the Government's positions today. Obviously, for reasons outlined in the letter, we hope that the Government can agree not to oppose the victims' motions.

Thanks for your help on these two issues.

Paul Cassell and Brad Edwards for the victims

Paul G. Cassell
Ronald N. Boyce Presidential Professor of Criminal Law
[REDACTED]
[REDACTED]
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