

From: [REDACTED]

To: [REDACTED]

Subject: Fwd: Motion to Compel and S.J. Briefing Schedule

Date: Wed, 08 Mar 2017 16:56:51 +0000

Importance: Normal

Can we talk later this afternoon?

Begin forwarded message:

From: Paul Cassel [REDACTED]

Date: March 8, 2017 at 8:51:03 AM EST

To: "Brad Edwards" [REDACTED]

Cc: [REDACTED]

Subject: RE: Motion to Compel and S.J. Briefing Schedule

Dear [REDACTED]

I'm writing to express some concerns about the Government's recent response to our most recent discovery requests and to request a stipulated briefing schedule for the summary judgment response and reply.

As you know, on or about August 31, 2016, Brad and I served you with a supplemental discovery request on various issues. Without repeating all those requests here, I would highlight one of them:

Supplemental Discovery Request 3. Any emails to or from FBI employees [REDACTED] regarding the prosecution (or non-prosecution) of the Epstein case, any of the Epstein victims, or federal prosecutors obtaining benefits from Epstein.

I later met with you and your team on the phone and gave very specific guidance about where the responsive emails would be, specifically, in the accounts for the FBI agents mentioned above. After taking months, and after promising us (in exchange for our agreement to extend deadlines) that we would be getting something substantive, we not only received nothing at all, but it appears obvious that no search for the requested information was accomplished. For example, despite all the names listed above the email we received from [REDACTED] stated: "I asked the FBI to conduct a search of the e-mail accounts of **Special Agents [REDACTED]**..."

Given the nature of the materials that we are seeking, it appears that the U.S. Attorney's Office is intent on not locating the materials that we are seeking.

We intend to file a motion to compel production of these materials on or about Tuesday, March 14 – making all of these points clearly for Judge Marra, so that he can draw his own conclusions about what is happening. We wanted to make one last effort to resolve this issue without the need for litigation before moving forward with this motion.

We also need briefing to move forward on the summary judgment that has been pending for nearly a year. Unfortunately we are not able to reach a settlement, but this case cannot remain stagnant any longer, especially since we are being stonewalled with the production we requested. I suggest a reasonable time line for responding to our

motion for summary Judgment is that it should be filed by May 8, which gives you two months. I also suggest the reply be due July 8. Please let me know if that is acceptable.

Paul Cassell for Jane Doe #1 and Jane Doe #2

Paul G. Cassell

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[REDACTED]

You can access my publications on <http://ssrn.com/author=30160>

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From: [REDACTED]
Sent: Friday, November 4, 2016 9:25 AM
To: Brad Edwards [REDACTED] Paul Cassell
[REDACTED]
Cc: [REDACTED] [REDACTED]
<[REDACTED]>
Subject: Responses to Supplemental Requests for Admissions and Supplemental Request for Production

Brad and Paul,

[REDACTED] have made progress in preparing our responses to the petitioners' Supplemental Request for Production and Supplemental Request for Admissions. We have contacted individuals who may have knowledge about the subjects encompassed in the request for admissions. Since some of the requests pertain to information possibly received by individuals within large organizations, such as the United States Attorney's Office, or "other components of the Department of Justice," or "the FBI," more time has been required to determine the appropriate response to the request for admission.

Similarly, the supplemental request for production seeks "emails or other documents" in nearly each request, from email systems maintained by other agencies within the DOJ, such as the FBI. I have inquired of the FBI whether emails from the period can be indexed and retrieved. My contact at the FBI Miami field office forwarded the request to the FBI information technology office several weeks ago. I will be speaking with the FBI Information Technology official on Monday, November 7, 2016, to see what emails can be retrieved from the 2006 – 2008 time period.

May the government have an additional thirty (30) days to respond to the supplemental request for production and supplemental request for admissions? Thanks.

[REDACTED]