

From: "[REDACTED] (USAFLS)" <[REDACTED]>

To: "[REDACTED] (USAFLS)" <[REDACTED]>, "[REDACTED] (USAFLS)" <[REDACTED]>

Subject: RE: Proposed Joint Status Report and Motion to Reset Briefing and Discovery Schedule

Date: Thu, 25 Aug 2016 18:03:11 +0000

Importance: Normal

I agree on waiting. I'm not sure whether we need anything from petitioners. Perhaps some requests for admissions?

From: [REDACTED] (USAFLS)

Sent: Thursday, August 25, 2016 1:41 PM

To: [REDACTED] (USAFLS) <[REDACTED]>; [REDACTED] (USAFLS) <[REDACTED]>

Subject: RE: Proposed Joint Status Report and Motion to Reset Briefing and Discovery Schedule

I vote for waiting to see what else they want to discover from the government. Insofar as discovery to the petitioners, do we need information from petitioners to support our cross-motion?

From: [REDACTED] (USAFLS)

Sent: Thursday, August 25, 2016 1:35 PM

To: [REDACTED] (USAFLS) <[REDACTED]>; [REDACTED] (USAFLS) <[REDACTED]>

Subject: FW: Proposed Joint Status Report and Motion to Reset Briefing and Discovery Schedule

Please see below. Do you want to wait and see what they are or start drafting some discovery ourselves?

[REDACTED]
Assistant U.S. Attorney
Southern District of Florida
[REDACTED]

From: Paul Cassell ([REDACTED])

Sent: Thursday, August 25, 2016 11:26 AM

To: [REDACTED] (USAFLS) <[REDACTED]>; Brad Edwards ([REDACTED]) <[REDACTED]>

Subject: RE: Proposed Joint Status Report and Motion to Reset Briefing and Discovery Schedule

Hey Marie,

Brad and I have been working on one additional set of discovery requests for the Government. We didn't want you to sign off on a schedule before you had a chance to review those and factor those into whatever schedule you want – i.e., we didn't want to sandbag you with those. We should have those finalized in the next few hours and will send you way. At that point, we're good with the proposed schedule – but we wanted you to have the requests before signing off.

As for settlement, Brad is handling those issues and he's always glad to talk to see if there is any progress. Paul

Paul G. Cassell
Ronald N. Boyce Presidential Professor of Criminal Law
University Distinguished Professor of Law

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

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

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From: [REDACTED]. (USAFLS) [<mailto:Ann.Marie.C.Villafana@usdoj.gov>]
Sent: Thursday, August 25, 2016 8:42 AM
To: Paul Cassell <[REDACTED]>; Brad Edwards ([REDACTED]) <[REDACTED]>
Subject: FW: Proposed Joint Status Report and Motion to Reset Briefing and Discovery Schedule

Hi guys – I never got a response on filing this. Can you advise if it is okay?

Also, if we think that settlement is still a possibility, we should try to move on that sooner rather than later, since we are telling the judge that we are working on it.

Thanks.

[REDACTED]
Assistant U.S. Attorney
Southern District of Florida
[REDACTED]

From: [REDACTED]. (USAFLS)
Sent: Monday, August 22, 2016 12:04 PM
To: 'Paul Cassell' <[REDACTED]>; Brad Edwards ([REDACTED]) <[REDACTED]>
Cc: [REDACTED] (USAFLS) <[REDACTED]>; [REDACTED] (USAFLS) <[REDACTED]>
Subject: Proposed Joint Status Report and Motion to Reset Briefing and Discovery Schedule

Hi Paul and Brad – To follow up on Paul's emails, I have drafted the attached. Please let me know if it is alright to file.

Best regards,
Marie

[REDACTED]
Assistant U.S. Attorney
Southern District of Florida
[REDACTED]