

**From:** "[REDACTED] (USAFLS)" <[REDACTED]>  
**To:** "[REDACTED]. (USAFLS)" <[REDACTED]>, "[REDACTED] (USAFLS)" <[REDACTED]>  
**Subject:** RE: Tracking down materials  
**Date:** Thu, 29 Sep 2016 18:57:10 +0000  
**Importance:** Normal  
**Inline-Images:** image001.png; image002.jpg

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I can talk at 4 or 4:30. I'm on the road after 5:30 today and virtually all day tomorrow.

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**From:** [REDACTED]. (USAFLS)  
**Sent:** Thursday, September 29, 2016 12:59 PM  
**To:** [REDACTED] (USAFLS) <[REDACTED]>; [REDACTED] (USAFLS) <[REDACTED]>  
**Subject:** FW: Tracking down materials

Can we discuss tomorrow afternoon? Or after 4:00 today?

Thanks.

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

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**From:** Brad Edwards [[mailto:\[REDACTED\]](mailto:[REDACTED])]  
**Sent:** Wednesday, September 28, 2016 12:33 PM  
**To:** [REDACTED]. (USAFLS) <[REDACTED]>; Paul Cassell <[REDACTED]>  
**Cc:** [REDACTED] (USAFLS) <[REDACTED]>; [REDACTED] (USAFLS) <[REDACTED]>  
**Subject:** RE: Tracking down materials

Yes, I believe the records were served August 31<sup>st</sup>.

I don't have the requests in front of me, but rather than search every government computer I think you would only need to search the computers (and emails) of the various people specifically named in the requests, along with Nezbitt's and Jason's (if those names were not provided). If there is a central server, especially for the intranet FBI system then that would probably be a place to search as well.

As for the requests themselves, they were drafted fairly narrowly given the information we have. If there is something about the requests that is making the search particularly difficult, let me know and I will see what more information I can give you to help you locate exactly what we are looking for.



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

**Brad Edwards  
Board Certified Trial Attorney**

[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]

[REDACTED] | [www.pathtojustice.com](http://www.pathtojustice.com)



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**From:** [REDACTED]. (USAFLS) [[mailto:\[REDACTED\]](mailto:[REDACTED])]  
**Sent:** Wednesday, September 28, 2016 11:33 AM  
**To:** Paul Cassell <[REDACTED]>; Brad Edwards <[REDACTED]>  
**Cc:** [REDACTED] (USAFLS) <[REDACTED]>; [REDACTED] (USAFLS) <[REDACTED]>  
**Subject:** RE: Tracking down materials

Hi Paul – I hope that you are well. I have been out of the office for a bit, but [REDACTED] and [REDACTED] have been working on your requests. [REDACTED] has been in contact with the FBI and they are checking on whether there are responsive emails and how we go about accessing any, should they exist.

I know that we had some conversation about narrowing the requests, but we believe that you need to try to narrow them in writing so that we can determine whether we need to apply to the Court to quash or limit the requests. As written, and even following the discussion, they are so broad and vague that we do not feel that we can respond. Some seem to call for a search of every government computer file, which would be impossible. Do you want to try to be more specific and, in the meantime, we will continue our efforts with the FBI and with items that are fairly specific (e.g., you specifically refer to [REDACTED] [REDACTED], which is something we have been and can continue to look into)?

The certificates of service specify different dates, but my records show that they were served on August 31<sup>st</sup>, is that consistent with your records?

Thanks so much.

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

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**From:** Paul Cassell [[mailto:\[REDACTED\]](mailto:[REDACTED])]  
**Sent:** Tuesday, September 27, 2016 3:18 PM  
**To:** 'Brad Edwards' <[REDACTED]>; [REDACTED]. (USAFLS) <[REDACTED]>  
**Cc:** [REDACTED] (USAFLS) <[REDACTED]>; [REDACTED] (USAFLS) <[REDACTED]>  
**Subject:** RE: Tracking down materials

Hey [REDACTED],

Just wanted to touch base and see how things are coming collecting the information that we talked about on the phone on September 2, if I recall correctly? As mentioned, I hopefully gave you precise enough information that finding the materials would not have been time consuming on your end. Just wanted to see if you had any more questions about that. Brad and I can assist if needed.

Paul Cassell for Jane Doe 1 and 2

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

EFTA00211126

University Distinguished Professor of Law

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

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**From:** Paul Cassell

**Sent:** Wednesday, August 31, 2016 3:28 PM

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

**Cc:** [REDACTED] (USAFLS) <[REDACTED]>; [REDACTED] (USAFLS) <[REDACTED]>

**Subject:** RE: Conf call re scheduling and discovery?

I free at that time on Friday – 3 PM Florida time, 1 PM Utah time.

Glad to chat. Please call my cell, at [REDACTED]. PC

Paul G. Cassell

Ronald N. Boyce Presidential Professor of Criminal Law

University Distinguished Professor of Law

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

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**From:** Brad Edwards [[mailto:\[REDACTED\]](mailto:[REDACTED])]

**Sent:** Wednesday, August 31, 2016 3:26 PM

**To:** [REDACTED]. (USAFLS) <[REDACTED]>

**Cc:** Paul Cassell <[REDACTED]>; [REDACTED] (USAFLS) <[REDACTED]>; [REDACTED]

(USAFLS) <[REDACTED]>

**Subject:** Re: Conf call re scheduling and discovery?

I have a deposition Friday afternoon but don't need to be on the call if Paul is free.

Sent from my iPhone

On Aug 31, 2016, at 5:15 PM, [REDACTED]. (USAFLS) <[REDACTED]> wrote:

Hi Brad and Paul – Can we do a conference call to talk about the schedule? I am totally booked tomorrow and [REDACTED] has a mediation on Friday morning, so I was hoping we could chat at 3:00 on Friday.

Please let me know if that works and I will set up a conference line.

Thanks.

EFTA00211127

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