

From: [REDACTED]
To: "Paul Cassell" [REDACTED], "Brad Edwards" <brad@pathtojustice.com>
Cc: [REDACTED]
Subject: RE: Tracking down materials
Date: Wed, 28 Sep 2016 15:33:03 +0000
Importance: Normal

Hi Paul – I hope that you are well. I have been out of the office for a bit, but [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] 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 31st, is that consistent with your records?

Thanks so much.

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

From: Paul Cassell [REDACTED]
Sent: Tuesday, September 27, 2016 3:18 PM
To: 'Brad Edwards' <brad@pathtojustice.com> [REDACTED]
Cc: [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
University Distinguished Professor of Law
S.J. Quinney College of Law at the University of Utah
[REDACTED]

[REDACTED]

CONFIDENTIAL: This electronic message - along with any/all attachments - is confidential. This message is intended only for the use of the addressee. If you are not the intended recipient, you may not use, disseminate, distribute or copy this communication. If you have received this message in error, please immediately notify the sender by reply electronic mail and delete the original message. Professor Cassell is admitted to the Utah State Bar, but not the bars of other states. Thank you.

From: Paul Cassell
Sent: Wednesday, August 31, 2016 3:28 PM
To: Brad Edwards [REDACTED]
Cc: [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
S. J. Quinney College of Law at the University of Utah

[REDACTED]

CONFIDENTIAL: This electronic message - along with any/all attachments - is confidential. This message is intended only for the use of the addressee. If you are not the intended recipient, you may not use, disseminate, distribute or copy this communication. If you have received this message in error, please immediately notify the sender by reply electronic mail and delete the original message. Professor Cassell is admitted to the Utah State Bar, but not the bars of other states. Thank you.

From: Brad Edwards [REDACTED]
Sent: Wednesday, August 31, 2016 3:26 PM
To: [REDACTED]
Cc: Paul Cassell [REDACTED]; [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] wrote:

Hi Brad and Paul – Can we do a conference call to talk about the schedule? I am totally booked tomorrow and Dexter 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.

[REDACTED]

Assistant U.S. Attorney
Southern District of Florida

