

[REDACTED]

Subject: Fwd: RE Any opposition to excusing Jane Doe 2?

Date: Fri, 22 Apr 2016 14:12:50 +0000

Importance: Normal

[REDACTED] -- can you let me know if you have any objection to the motion?

[REDACTED]

Begin forwarded message:

From: Paul Cassell <cassellp@law.utah.edu>

Date: April 22, 2016 at 8:34:04 AM CDT

[REDACTED] "Brad Edwards"

Subject: RE Any opposition to excusing Jane Doe 2?

[REDACTED]

Brad and I are preparing to file today not only the pleading regarding Epstein's attendance at the mediation (shown to you earlier) but also a separate pleading seeking to excuse Jane Doe 2 from the personal attendance requirement. We would like to indicate that this motion is unopposed. See the text of the motion below. Thanks in advance for giving us your position. Paul and Brad for Jane Doe 2

COMES NOW Jane Doe No. 2 (the "victims"), by and through undersigned counsel, to request that she be excused from the upcoming court-ordered mediation session in this case. Jane Doe 2 is aware that, ordinarily, the personal attendance of all parties to a case is required. The obvious purpose of that requirement is to insure that, if possible, the mediation is successful. In this case, Jane Doe 2 has agreed that, if a mediated resolution is reached with Jane Doe 1, that resolution will be acceptable to her as well. She will also be available by telephone should any unanticipated need arise. Accordingly, her personal attendance at the mediation will not be required to produce a successful mediation and she should not be required to personally attend.

WHEREFORE, Jane Doe 2 asks to be excused from personal attendance requirement of the pending mediation.

Paul G. Cassell

[REDACTED] of Criminal Law
University of Utah

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

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[REDACTED]

Sent: Monday, April 18, 2016 6:33 PM
To: Brad Edwards (brad@pathtojustice.com); Paul Cassell
Subject: Checking in on the motion for writ

Hi Brad and Paul – I noticed that the motion for writ hasn't been filed yet. The Marshals have to arrange to travel to Tampa and back plus do all the legwork to have the Sheriff release the prisoner. In other words, you need to file the motion asap for us to keep the May date. The cases say that the writ can be denied if it is untimely – even if the prisoner is the plaintiff in the suit.

Thanks.

[REDACTED]