

[REDACTED]  
**To:** "Paul Cassell" <cassellp@law.utah.edu>

**Cc:** "Brad Edwards (brad@pathtojustice.com)" <brad@pathtojustice.com>

**Subject:** RE: Jane Doe Case

**Date:** Wed, 11 May 2016 20:21:37 +0000

**Importance:** Normal

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Dear Paul: Thank you so much for getting back to me and being so specific. Do you have an electronic copy so we can review and determine our position? If you prefer to send via FedEx, that is fine, too.

[REDACTED]  

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**From:** Paul Cassell [mailto:cassellp@law.utah.edu]

**Sent:** Wednesday, May 11, 2016 4:18 PM

[REDACTED]  
**Cc:** Brad Edwards (brad@pathtojustice.com)

**Subject:** RE: Jane Doe Case

CONFIDENTIAL SETTLEMENT DISCUSSION IN ANTICIPATION OF MEDIATION – NOT TO BE DISCLOSED OUTSIDE OF THE CONFIDENTIAL MEDIATION

[REDACTED]  
The only thing we're interested in is the our discovery motion, seeking Dershowitz discovery. That pleading remains under seal – and there are various circumstances where it would be useful for us to refer to it.

We filed it under seal for a period of 10 days or whatever time was necessary for the Court to rule on any objection on unseal. We served it on Dershowitz, Epstein, and the Government. None of them responded. It has been sitting under an (improperly extended) seal now for much longer than the 10 days.

At the mediation, we would like to discuss the Government filing a short pleading, calling to the Court's attention that none one has asked for this pleading to remain under seal and so, as a housekeeping matter, the Court should unseal it.  
PC

Paul G. Cassell

[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.

[REDACTED]

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**Sent:** Wednesday, May 11, 2016 2:10 PM

**To:** Paul Cassell <[cassellp@law.utah.edu](mailto:cassellp@law.utah.edu)>

**Cc:** Brad Edwards ([brad@pathtojustice.com](mailto:brad@pathtojustice.com)) <[brad@pathtojustice.com](mailto:brad@pathtojustice.com)>

**Subject:** Jane Doe Case

Hi Paul – Sorry to bother you. I am trying to get as much nailed down as possible before the mediation. One item that you raised was unsealing certain pleadings in the case. Can you provide a list of the items that you want unsealed so I can try to get our office onboard before the mediation? I thought the Court had unsealed most everything already, but I haven't done a document by document review.

Thank you!

[REDACTED]