

From: "[REDACTED]" <[REDACTED]>

To: "Brad Edwards" <[REDACTED]>

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

Date: Fri, 22 Apr 2016 15:18:22 +0000

Importance: Normal

Hi Brad -- That sounds good. You should have received our statement of non-opposition by now, with some proposed language. Let me know when you can talk about the demand list. We probably need at least 30 minutes to discuss. I will be traveling tomorrow but available all day Sunday and then back in the office full time on Monday.

Take care.

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

-----Original Message-----

From: Brad Edwards [mailto:[REDACTED]]

Sent: Friday, April 22, 2016 10:10 AM

To: [REDACTED]. (USAFLS)

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

I understand. Let's talk later. I think this is the best we can do now.

Sent from my iPhone

> On Apr 22, 2016, at 10:11 AM, [REDACTED]. (USAFLS) <[REDACTED]> wrote:

>
> Let me get [REDACTED] view. I think she should be dismissed from case for reasons previously discussed but I will get back to you ASAP.

>
> [REDACTED]
> [REDACTED]
> [REDACTED]
> [REDACTED]

>
> On Apr 22, 2016, at 8:34 AM, Paul Cassell <[REDACTED]<mailto:[REDACTED]>> wrote:

>
> Hey [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
> Ronald N. Boyce Presidential Professor of Criminal 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: [REDACTED] (USAFLS)
> [REDACTED] <[REDACTED]>
> [REDACTED]
> Sent: Monday, April 18, 2016 6:33 PM
> To: Brad Edwards
> ([REDACTED] <mailto:[REDACTED]>); 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]
> [REDACTED]
> [REDACTED]
> [REDACTED]

>
>
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