

**From:** Brad Edwards [REDACTED]

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: Jane Does v. U.S. -- Motion to Unseal

**Date:** Thu, 07 Apr 2011 14:16:40 +0000

**Importance:** Normal

**Inline-Images:** image001.jpg

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[REDACTED]

I read the cases. I don't agree with your interpretation of the cases to the extent that you are saying that the dissemination of email correspondence between you and JE's attorneys will somehow avail an argument for JE's attorneys to make that his due process rights have somehow been violated. I started going line by line on your designations, but it is time-consuming and because I don't agree with your interpretation of the cases, I just don't see the point of going through each line and arguing points. Regardless, I have no problem with agreeing to redacting statute numbers as well as personal information (addresses, phone numbers, etc.).

I hope this helps.

**Brad Edwards**

Civil Justice Attorney

**Farmer, Jaffe, Weissing,**

**Edwards, Fistos & Lehrman, P.L.**

[REDACTED]  
Fort Lauderdale, Florida 33301



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**From:** [REDACTED]

**Sent:** Wednesday, April 06, 2011 1:57 PM

**To:** Brad Edwards

**Cc:** [REDACTED]

**Subject:** Jane Does v. U.S. -- Motion to Unseal

Dear Brad: Hope you are doing well.

I wondered whether you had a chance to review the In re Smith case, 656 F.2d 1101, that I had discussed with you earlier. Based on that case and its progeny, in particular *Senate of the Commonwealth of Puerto Rico v. United States Dep't of Justice*, 1992 WL 119127 at \*3 (D.D.C. May 13, 1992) and *United States v. Anderson*, 55 F. Supp. 2d 1163, 1168 (D. Kan. 1999), I believe that the following portions of your Exhibit A should remain under seal (and any related portions of DE48):

005 [words "1512 and 113"]

006-007

008 [paragraph 1 only]

016 [words "██████████," "403," "113," and "371 conspiracy"]

017-018

019 [paragraph 1 only]

028 ["1512"]

029 [first 2 paragraphs]

030 [numbered paragraphs 2, 3, and 4]

036 [numbered paragraphs 1(a) and 1(c)]

042 [word "1512"]

045 [word "1512(d)"]

046-048

049 [paragraph 1]

057 [first sentence]

058

059 [first sentence]

062-063 ["1512"]

064 [paragraph 1]

071 ["1512"]

073 ["1512"]

191 [3<sup>rd</sup> full paragraph, 3<sup>rd</sup> and 5<sup>th</sup> sentences]

192 [4<sup>th</sup> full paragraph [2<sup>nd</sup> and 3<sup>rd</sup> sentences]

300-309

310

329-340

350-358

The names "[REDACTED], [REDACTED], and [REDACTED]" in any copies of the draft NPA

Also, do you have any objections to redacting my personal email address and personal cell phone numbers in Bates numbers 005, 016, 026-030, 039, 056, 062, 072, 073, 088, 090, 097-098, 177, 180? You may not know that prisoners have access to PACER.

Thank you!

[REDACTED]

Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

[REDACTED]