

From: [REDACTED]

To: "Paul Cassell" [REDACTED]

Cc: "Brad Edwards" [REDACTED]

Subject: RE: Proposed Pleading to File - fixed a couple of sentences

Date: Wed, 27 Oct 2010 20:50:55 +0000

Importance: Normal

Paul,

Thank you for sending the revised document. I have spoken with the Acting U.S. Attorney on this matter. We believe that if the victims simply filed a response to the order to show cause, and deferred filing any motion for summary judgment, it would promote the process for the parties to meet and address mutual concerns. However, we will not stipulate that the government has not been prejudiced by the passage of time in this case from its initial filing in July 2008.

[REDACTED]

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

From: Paul Cassell [mailto:[REDACTED]]

Sent: Wednesday, October 27, 2010 4:10 PM

To: Paul Cassell; [REDACTED]

Cc: Brad Edwards; [REDACTED]

Subject: RE: Proposed Pleading to File - fixed a couple of sentences

[REDACTED]

I noticed that I missed a couple of sentences in the pleading I sent to you that made reference to the simultaneously filed declaration of Brad Edwards. This revision fixes those couple of sentences, making reference only to a soon-to-be filed declaration. Paul

Paul G. Cassell

Ronald N. Boyce Presidential Professor of Criminal Law [REDACTED] h

[REDACTED]

Salt Lake City, UT 84112-0730

[REDACTED]

<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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

From: Paul Cassell

Sent: Wednesday, October 27, 2010 1:50 PM

To: [REDACTED]

Cc: 'Brad Edwards'; [REDACTED]
Subject: RE: Proposed Pleading to File

THE FOLLOWING COMMUNICATION IS A SETTLEMENT OFFER WITHIN THE MEANING OF
FEDERAL RULE OF EVIDENCE 408

Dear [REDACTED] (and [REDACTED]),

Attached is proposed pleading that we would file, reflecting your request that we delay and reflecting your stipulation that the passage of time to this point has not prejudiced the U.S. Attorney's Office.

I want to continue to remind your office of its obligation to use its "best efforts" to protect the rights of crime victims. 19 USC 3771(c)(1). I trust that as you review our proposed pleading you will bear that requirement in mind.

I can be reached on my cell at [REDACTED]. As you know, we have to file today and are prepared to do so if we can't work something out. At the same time, we would like to work cooperatively with your office to bring Epstein to justice -- our revised pleadings are a step in that direction, while hopefully responding to the concerns that your Office has raised.

Paul Cassell
Counsel for Jane Doe #1 and Jane Doe #2

Paul G. Cassell
Ronald N. Boyce Presidential Professor of Criminal Law [REDACTED]

[REDACTED]
Salt Lake City, UT 84112-0730
[REDACTED]

<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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

From: [REDACTED]
Sent: Monday, October 25, 2010 10:16 AM
To: Paul Cassell
Subject: Out of Office AutoReply: Conferring on Statement of Facts Before Wednesday's Filing

I will be on government travel from October 25-26, 2010. If you need to reach me, please call me at [REDACTED].
[REDACTED] Thanks.