

From: "[REDACTED]. (USAFLS)" </O=USA/OU=FLS/CN=RECIPIENTS/CN=[REDACTED]>

To: "[REDACTED]. (SHB)" <[REDACTED]>

Subject: Update

Date: Mon, 15 Oct 2007 21:29:43 +0000

Importance: Normal

Hi [REDACTED] – The office has decided that to avoid an appearance of favoring any lawyer or law firm, a Special Master will select the attorney representative and that we cannot even provide the Special Master with a list of attorneys from which to choose.

Retired Judge [REDACTED] is going to be the Special Master and he is at [REDACTED]. I was allowed to provide a list of criteria for the selection, as follows:

1. Experience doing both plaintiffs' and defense litigation.
2. Experience with state and federal statutory and common law tort claims.
3. The ability to communicate effectively with young women (the victims' current ages are between 16 and 24).
4. Employment with a firm large enough to handle the possibility of at least a dozen trials at the same time.
5. Experience litigating against large law firms and high profile attorneys.
6. Sensitivity to the nature of the suit and the victims' interest in maintaining their privacy.
7. Experience litigating in federal court in the Southern District of Florida.
8. The resources to hire experts and others, while working on a contingency fee basis, in order to prepare for trial, if a settlement cannot be reached.
9. The ability to negotiate effectively.

I will leave it to you whether you or someone in your firm wants to contact Judge [REDACTED]. I apologize that this process has become so cumbersome. It has reminded me why government bureaucracy moves so slowly.

Thank you for your willingness to step up and undertake this difficult project.

Regards,
[REDACTED]

[REDACTED]