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March 4, 2018

Scott J. Link
Kara Berard Rockenbach
Link & Rockenbach, PA
1555 Palm Beach Lakes Boulevard, Suite 301
West Palm Beach, FL 33401
Via email: Scott@linkrocklaw.com
Kara@linkrocklaw.com

Re: Your Possession of Confidential and Privileged Materials

Dear Mr. Link and Ms. Rockenbach:

I write on behalf of three of my clients, whom I will refer to as L.M., E.W., and Jane Doe. I believe you are familiar with their identities as child sexual assault victims of your client, Jeffrey Epstein.

It has come to my attention that you are in possession of attorney-client and work-product protected materials to which my clients are entitled to confidentiality. For example, it is my understanding that you have in your possession emails between Mr. Bradley J. Edwards and me discussing litigation strategies and other attorney-client and work-product protected information in connection with civil cases prosecuted against Jeffrey Epstein for sex offenses he committed against children (e.g., Jane Doe v. Epstein, No. 9:08-cv-80893-Marra/Johnson (S.D. Fla.)) and/or a related federal Crime Victims' Rights Act lawsuit currently pending in the U.S. District Court for the Southern District of Florida (e.g., Jane Does 1 & 2. v. United States, No. 9:08-cv-80736-KAM (S.D. Fla.)). You also appear to have other communications between Mr. Edwards and other attorneys that are similarly protected and related to those cases. It appears that many of these confidential and protected materials have been listed in Plaintiff/Counter-Defendant Jeffrey Epstein's Notice of Service of Unredacted Appendix in Support of Response in Opposition to Defendant/Counter-Plaintiff Bradley J. Edwards' Second Supplement to Motion in Limine Addressing Scope of Admissible Evidence (hereinafter "Notice of Unredacted Materials"), *Epstein v. Edwards*, Case No. 50-

* This daytime business address is provided for identification and correspondence purposes only and is not intended to imply institutional endorsement by the University of Utah. Mr. Cassell is an attorney licensed in the State of Utah and has been admitted *pro hac vice* in certain cases relevant to this letter.

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2009CA040800XXXXMBAG (submitted to opposing counsel on March 3, 2018, via email). You are apparently in possession of these materials despite these communications being specifically listed on the privilege log that was filed in the case of *Epstein v. Edwards, supra*. I will refer hereinafter to these materials you possess (both those listed in your Notice of Unredacted Materials and all other documents or emails of a similar character, even if not listed in the Notice) as the “protected documents.”

On behalf of L.M., E.W., and Jane Doe, I write to:

1. Notify you that protected documents are confidential and are documents to which L.M., E.W., and Jane Doe continue to assert all applicable privileges and protections.
2. Request you to explain how you obtained those protected documents.
3. Request that you correct the assertion made in the Notice of Unredacted Materials that the protected documents specified were produced by Mr. Edwards (an attorney for L.M., E.W., and Jane Doe), as that assertion is not accurate. (If you believe the assertion to be accurate, please produce the documentation associated with that production—my understanding is that Mr. Edwards did not disclose the documents, but rather asserted privilege over them and provided Epstein’s-then lawyers with an appropriate privilege log reflecting that fact—a log and privilege assertion that was still in place at the time Epstein dismissed his claim against Edwards in August 2012 and that remains in place today).
4. Request you to immediately return all the protected documents and destroy any copies of the protected documents, including any references to the materials and their contents in any filing or other litigation-related communications you may have made.
5. Refrain from identifying any of the persons involved in any of the protected documents (i.e., either the clients or the attorneys) in any public statements or court filings that you may make.
6. Refrain from making any use of these protected documents whatsoever.

Within 48 hours, I request an immediate return of all these protected documents and destruction of copies and other disclosing documents, along with your pledge not to use these materials. In light of your anticipated cooperation, please send me a return email indicating compliance with your ethical and other obligations in connection with

these materials so that I can be certain that you have fully protected the rights of third parties L.M., E.W., and Jane Doe.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Paul Cassell". The signature is stylized and cursive.

Paul G. Cassell, Esq.
for L.M., E.W., and Jane Doe