

**From:** Paul Cassell <[REDACTED]>

**To:** '[REDACTED])" <[REDACTED]>

**Subject:** RE: Victims responding to Epstein

**Date:** Sun, 14 Jul 2019 20:08:25 +0000

**Importance:** Normal

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Hey [REDACTED]

I am drafting our response to Epstein's claim that the victims cannot obtain "rescission" as a remedy. Because my clients would like to avoid interfering with your efforts in any way, would you like to see our draft before it is filed?

In particular, our brief begins with a section arguing that:

THIS CASE MUST BE DECIDED ON THE AGREED PREMISE THAT THE NPA ONLY COVERS THE U.S. ATTORNEY'S OFFICE FOR THE SOUTHERN DISTRICT OF FLORIDA.

It occurs to me it might be useful for your Office to review that section before we file. We file in about one week.

Happy to handle this in any way you see best. Paul Cassell for Jane Doe 1 and 2

Paul G. Cassell

Ronald N. Boyce Presidential Professor of Criminal Law and University Distinguished Professor of Law  
S.J. Quinney College of Law at the University of Utah

[REDACTED]  
[REDACTED]  
You can access my publications on <http://ssrn.com/author=30160>

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