

PAUL G. CASSELL DECLARATION

EXHIBIT 4
(File Under Seal)

IN THE CIRCUIT COURT OF THE
SEVENTEENTH JUDICIAL CIRCUIT, IN
AND FOR BROWARD COUNTY, FLORIDA

CASE NO.: CACE 15-000072

BRADLEY J. EDWARDS and PAUL G.
CASSELL,

Plaintiff,

vs.

ALAN M. DERSHOWITZ,

Defendant,

_____ /

**NOTICE OF WITHDRAWAL OF MOTION FOR
PARTIAL SUMMARY JUDGMENT**

Plaintiffs, Edwards and Cassell, by and through their undersigned counsel, and pursuant to the terms of the confidential settlement agreement and mutual release between the parties to this action, do hereby give notice of the withdrawal of the motion for partial summary judgment they filed in this lawsuit and all supporting documents.

In the event that the noticed withdrawal is determined to be subject to Court approval, the Plaintiffs would show in support of this notice that Edwards and Cassell continue to represent Virginia Giuffre in separate pending matters, and shall continue to advance her legitimate legal interests in those matters. As expressly understood by the parties upon the execution of the Confidential Settlement Agreement and Mutual Release, Ms. Giuffre reaffirms her allegations, and the withdrawal of the referenced filings is not intended to be, and should not be construed as being, an acknowledgement by Edwards and Cassell that the allegations made by Ms. Giuffre were mistaken. Edwards and Cassell do acknowledge that the public filing in the Crime Victims'

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Rights Act case of their client's allegations against Defendant Dershowitz became a major distraction from the merits of the well-founded Crime Victims' Rights Act case by causing delay and, as a consequence, turned out to have been a tactical mistake. For that reason, Edwards and Cassell have chosen to withdraw the referenced filing as a condition of settlement.

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via E-Serve to all Counsel on the attached list, this 8TH day of APRIL, 2016.



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