



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

May 20, 2021

BY ELECTRONIC MAIL

Christian Everdell, Esq.

Mark Cohen, Esq.

Cohen & Gresser LLP

800 Third Avenue

New York, NY 10022

Laura Menninger, Esq.

Jeffrey Pagliuca, Esq.

Haddon, Morgan and Foreman, P.C.

150 East Tenth Avenue

Denver, CO 80203

Bobbi Sternheim, Esq.

Law Offices of Bobbi C. Sternheim

33 West 19th Street-4th Fl.

New York, NY 10007

Re: *United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)*

Dear Counsel:

Today we are producing the materials listed in the below index. These discovery materials are stamped with control numbers SDNY_GM_02753432 through SDNY_GM_02753551 and SDNY_GM_SUPP_00219450 through SDNY_GM_SUPP_00219451.

Regarding the materials stamped with control numbers SDNY_GM_02753529 through SDNY_GM_02753551, these folders contain native image files from several devices that correspond with images previously produced to you in PDF format on November 9, 2020. The enclosed spreadsheet indicates which control numbers with “SDNY_GM_SUPP” prefixes correspond with these native “carved” images. The enclosed spreadsheet also details the original file names of the “carved” files that were previously produced to you in their native format, also on November 9, 2020.

Please note that both this letter and the enclosed materials are governed by the July 31, 2020 Protective Order in this case. **This letter is itself designated as “confidential,” because it includes information regarding records designated as “confidential” under the Protective Order.** An index of the materials contained in this production is below:

Bates Start	Bates End	Summary Description	Confidential Designation
SDNY_GM_02753432	SDNY_GM_02753528	Interlochen records	Confidential
SDNY_GM_02753529	SDNY_GM_02753529	Native "carved" images previously produced in PDF format for device NYC024321	Confidential
SDNY_GM_02753530	SDNY_GM_02753530	Native "carved" images previously produced in PDF format for device NYC024323	Confidential
SDNY_GM_02753531	SDNY_GM_02753531	Native "carved" images previously produced in PDF format for device NYC024324	Confidential
SDNY_GM_02753532	SDNY_GM_02753532	Native "carved" images previously produced in PDF format for device NYC024326	Confidential
SDNY_GM_02753533	SDNY_GM_02753533	Native "carved" images previously produced in PDF format for device NYC024332	Confidential
SDNY_GM_02753534	SDNY_GM_02753534	Native "carved" images previously produced in PDF format for device NYC024336	Confidential
SDNY_GM_02753535	SDNY_GM_02753535	Native "carved" images previously produced in PDF format for device NYC024337	Confidential
SDNY_GM_02753536	SDNY_GM_02753536	Native "carved" images previously produced in PDF format for device NYC024340	Confidential
SDNY_GM_02753537	SDNY_GM_02753537	Native "carved" images previously produced in PDF format for device NYC024341	Confidential
SDNY_GM_02753538	SDNY_GM_02753538	Native "carved" images previously produced in PDF format for device NYC024343	Confidential
SDNY_GM_02753539	SDNY_GM_02753539	Native "carved" images previously produced in PDF format for device NYC024348	Confidential

SDNY_GM_02753540	SDNY_GM_02753540	Native "carved" images previously produced in PDF format for device NYC024349	Confidential
SDNY_GM_02753541	SDNY_GM_02753541	Native "carved" images previously produced in PDF format for device NYC024350	Confidential
SDNY_GM_02753542	SDNY_GM_02753542	Native "carved" images previously produced in PDF format for device NYC024351	Confidential
SDNY_GM_02753543	SDNY_GM_02753543	Native "carved" images previously produced in PDF format for device NYC024363	Confidential
SDNY_GM_02753544	SDNY_GM_02753544	Native "carved" images previously produced in PDF format for device NYC024368	Confidential
SDNY_GM_02753545	SDNY_GM_02753545	Native "carved" images previously produced in PDF format for device NYC024370	Confidential
SDNY_GM_02753546	SDNY_GM_02753546	Native "carved" images previously produced in PDF format for device NYC024372	Confidential
SDNY_GM_02753547	SDNY_GM_02753547	Native "carved" images previously produced in PDF format for device NYC024384	Confidential
SDNY_GM_02753548	SDNY_GM_02753548	Native "carved" images previously produced in PDF format for device NYC024386	Confidential
SDNY_GM_02753549	SDNY_GM_02753549	Native "carved" images previously produced in PDF format for device NYC024388	Confidential
SDNY_GM_02753550	SDNY_GM_02753550	Native "carved" images previously produced in PDF format for device NYC024392	Confidential
SDNY_GM_02753551	SDNY_GM_02753551	Native "carved" images previously produced in PDF format for device NYC027910	Confidential
SDNY_GM_SUPP_00219450	SDNY_GM_SUPP_00219450	Image from device NYC024329	Confidential

SDNY_GM_SUPP_00219451	SDNY_GM_SUPP_00219451	Image from device NYC024366	Confidential
-----------------------	-----------------------	--------------------------------	--------------

The Government recognizes that its discovery obligations are ongoing and will promptly produce any additional discoverable material of which it becomes aware. Please do not hesitate to reach out if you have any difficulty accessing these materials.

Very truly yours,

AUDREY STRAUSS
United States Attorney

by: 

Assistant United States Attorneys
