

**From:** David Oscar Markus <[REDACTED]>  
**To:** "[REDACTED] (USANYS)" <[REDACTED]>  
**Cc:** "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>  
**Subject:** Re: U.S. v. Ghislaine Maxwell  
**Date:** Sat, 10 Apr 2021 01:23:56 +0000

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[REDACTED]

If you are filing that one unredacted pleading, would you be willing to file the others as well? I think the court should have them all. Let me know if you will include the others.

Thanks,

David

--David Oscar Markus  
Markus/Moss  
markuslaw.com  
[REDACTED]

On Apr 9, 2021, at 6:25 PM, David Oscar Markus <[REDACTED]> wrote:

Hi [REDACTED]

No objection.

Have a nice weekend.

David.

--David Oscar Markus  
Markus/Moss  
markuslaw.com  
[REDACTED]

On Apr 9, 2021, at 6:21 PM, [REDACTED] (USANYS) <[REDACTED]> wrote:

David,

We intend to submit a motion to seek leave to file an unredacted copy of Exhibit F under seal and need to indicate your position. Do you consent to this request?

Thanks [REDACTED]

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**From:** David Oscar Markus <[REDACTED]>  
**Sent:** Thursday, April 01, 2021 6:35 PM  
**To:** [REDACTED] (USANYS) <[REDACTED]>  
**Cc:** [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Subject:** Re: U.S. v. Ghislaine Maxwell

Thanks. I won't ask to shorten the 10 days if the government doesn't plan on asking for an extension. —dm

--David Oscar Markus  
Markus/Moss  
markuslaw.com  
[REDACTED]

On Apr 1, 2021, at 6:07 PM, [REDACTED] (USANYS) <[REDACTED]> wrote:

We do not oppose the Court expediting consideration but do oppose any request to shorten the ten days by which we have to respond.

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**From:** David Oscar Markus <[REDACTED]>  
**Sent:** Thursday, April 01, 2021 5:59 PM  
**To:** [REDACTED] (USANYS) <[REDACTED]>  
**Cc:** [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Subject:** Re: U.S. v. Ghislaine Maxwell

Both.

--David Oscar Markus  
Markus/Moss  
markuslaw.com  
[REDACTED]

On Apr 1, 2021, at 5:33 PM, [REDACTED] (USANYS) <[REDACTED]> wrote:

David,

Are you asking to expedite the Court's consideration of the appeal or asking to shorten our timeline for responding?

Thanks,  
[REDACTED]

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**From:** David Oscar Markus <[REDACTED]>  
**Sent:** Thursday, April 01, 2021 5:27 PM  
**To:** [REDACTED] <[REDACTED]>  
**Cc:** [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>  
**Subject:** Re: U.S. v. Ghislaine Maxwell

Counsel:

What is the government's position on expediting the appeal?

Thank you.

David

--David Oscar Markus

Markus/Moss

markuslaw.com

On Mar 25, 2021, at 7:11 PM, [REDACTED] <[REDACTED]> wrote:

David,

Thanks for letting us know that you'll be counsel on this appeal. As an initial matter, the majority of the docket entries you've referenced do not appear to be redacted. In any event, you may obtain these materials from defense counsel -- I've copied them here. This case is already governed by a protective order (ECF No. 36), which is binding on all counsel.

Thanks,

[REDACTED]

[REDACTED]

Assistant United States Attorney

Southern District of New York

One Saint Andrew's Plaza

New York, NY 10007

(212) 63[REDACTED]

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**From:** David Oscar Markus <[REDACTED]>

**Sent:** Thursday, March 25, 2021 5:33 PM

**To:** [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>;

[REDACTED] (USANYS) <[REDACTED]>

**Subject:** U.S. v. Ghislaine Maxwell

Good afternoon counsel:

I have been engaged to represent Ghislaine Maxwell in her appeal from the denial of her third application for bail. In preparing this appeal, I will need access to certain unredacted documents, including docket entries 4, 18, 22, 97, 100, 103, 106, 159, 160, 165, 171, 169. Do you have any objection to me having access to these unredacted documents? (There may be additional documents that I need, but I have not identified them as of yet.) I'm happy to enter into a protective order with the government if you believe

that is necessary. I plan on filing the appeal next week, so I would appreciate it if you could get back to me as soon as possible.

Thank you,

David

--David Oscar Markus

markuslaw.com

[REDACTED]