

From: [REDACTED]@usa.doj.gov>
To: David Oscar Markus <dmarkus@markuslaw.com>, [REDACTED] (USANYS)"
[REDACTED]@usa.doj.gov>
Cc: "[REDACTED]"@usa.doj.gov>
Subject: RE: U.S. v. Ghislaine Maxwell
Date: Wed, 31 Mar 2021 15:15:15 +0000

David,

Confirmed, the Government opposes the motion for bail and intends to file a response.

Best,

Assistant United States Attorney
Southern District of New York
1 St. Andrew's Plaza
New York, NY 10007
212-637 [REDACTED]

From: David Oscar Markus <dmarkus@markuslaw.com>
Sent: Wednesday, March 31, 2021 11:02 AM
To: [REDACTED]
Subject: Re: U.S. v. Ghislaine Maxwell

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We are preparing our motion for bail in the Second Circuit and need to inform the Court of the government's position. We intend to let the Court know that the Government's opposes Ms. Maxwell's motion and intends to file a response. Please confirm.

Thanks,

David

--David Oscar Markus

markuslaw.com

305-379

From: [REDACTED] (USANYS) <[\[REDACTED\]@usdoj.gov](mailto:[REDACTED]@usdoj.gov)>

Sent: Thursday, March 25, 2021 7:10 PM

To: David Oscar Markus

Cc: [REDACTED] (USANYS); [REDACTED] (USANYS); Christian Everdell; Bobbi Sternheim (bcsternheim@mac.com);

Mark S. Cohen

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

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,

Assistant United States Attorney

Southern District of New York

One Saint Andrew's Plaza

New York, NY 10007

(212) 637-[REDACTED]

From: David Oscar Markus <dmarkus@markuslaw.com>

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

To: [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

305-379 [REDACTED]