

**From:** [REDACTED] >  
**To:** [REDACTED]  
**Cc:** [REDACTED]

**Subject:** Re: [EXTERNAL] Re: SDNY PRESS GUIDANCE | U.S. v. GHISLAINE MAXWELL, FRIDAY, NOVEMBER 26, 2021

**Date:** Fri, 26 Nov 2021 18:59:29 +0000

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Online tomorrow, print Sunday (UK). They'll focus primarily on the defense case.

Sent from my iPhone

On Nov 26, 2021, at 1:24 PM, [REDACTED] > wrote:

Ok, thanks. When will they publish? ([REDACTED] let's discuss giving the team a heads up)

Sent from my iPhone

On Nov 26, 2021, at 1:23 PM, [REDACTED] > wrote:

For what it's worth, they called to tell me they plan to publish an article about [REDACTED] using her real name and a photo. I declined to provide further guidance or comment.

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**From:** [REDACTED]  
**Sent:** Friday, November 26, 2021 10:24 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: [EXTERNAL] Re: SDNY PRESS GUIDANCE | U.S. v. GHISLAINE MAXWELL, FRIDAY, NOVEMBER 26, 2021

Thanks [REDACTED] I don't think you need to say any more regarding the below, but for your knowledge, [REDACTED] will testify under her own name (and has testified under her own name at the prior bail hearings).

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**From:** [REDACTED]  
**Sent:** Friday, November 26, 2021 10:19 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** FW: [EXTERNAL] Re: SDNY PRESS GUIDANCE | U.S. v. GHISLAINE MAXWELL, FRIDAY, NOVEMBER 26, 2021

We circulated Tuesday's guidance to some additional UK reporters this morning. The additional guidance we drafted on Wednesday will go out shortly, we'll blind copy you.

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**From:** [REDACTED]  
**Sent:** Friday, November 26, 2021 10:14 AM  
**To:** Gadher, Dipesh <[dipesh.gadher@sunday-times.co.uk](mailto:dipesh.gadher@sunday-times.co.uk)>

Cc: [REDACTED]

Subject: RE: [EXTERNAL] Re: SDNY PRESS GUIDANCE | U.S. v. GHISLAINE MAXWELL, FRIDAY, NOVEMBER 26, 2021

In accordance with the previously provided court order, **any victim or witness** testifying under a pseudonym should not be identified, and should be referred to under their pseudonym, regardless of any previous identifications or waivers that might have been made.

Best,

From: Gadher, Dipesh <[dipesh.gadher@sunday-times.co.uk](mailto:dipesh.gadher@sunday-times.co.uk)>

Sent: Friday, November 26, 2021 9:58 AM

To: [REDACTED]

Subject: [EXTERNAL] Re: SDNY PRESS GUIDANCE | U.S. v. GHISLAINE MAXWELL, FRIDAY, NOVEMBER 26, 2021

Hi - can I please clarify if I'm allowed to identify [REDACTED] by name as she has previously waived her right to anonymity? How will she be identified in future proceedings? Thanks.

Best

Dipesh

The Sunday Times

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—

London SE1 9GF

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On Fri, 26 Nov 2021 at 14:48, Biase, Nicholas (USANYS) <[Nicholas.Biase@usdoj.gov](mailto:Nicholas.Biase@usdoj.gov)> wrote:

In order meet the demand for the high volume of media requests we are already receiving, the following guidance is being provided in advance of the trial to ensure efficient communications. Please take careful note.

<image001.png>

#### PRESS GUIDANCE

Friday, November 26, 2021

**\*OFF-THE-RECORD, AND FOR GUIDANCE ONLY:** *Several of the government's anticipated witnesses will be testifying in this trial using a pseudonym or first name. The Court granted a Government motion [attached] requesting that they be able to do so, because the victim witnesses are expected to describe alleged sensitive, explicit and personal events concerning illegal sexual abuse, sexual contact and other acts of which they have been victims. I believe most, if not all, news media outlets have a policy against identifying sex crime victims without their consent, and urge you to abide by that policy with our witnesses and respect their privacy.*

9:30 a.m. – Final pretrial conference U.S. v. [Ghislaine Maxwell](#) – the defendant is charged in connection to conspiring with Jeffrey Epstein to entice minors to travel to engage in criminal sexual activity – before Judge Alison

Nathan (Courtroom 318, 40 Foley Square [overflow Courtrooms 110, 506, 905, and 906 of the Thurgood Marshall U.S. Courthouse]).

**EXHIBITS:** Government exhibits will be provided exclusively through the SDNY file share. If you are unable to access this link to the file share (USAFx), you must establish an account to access the files. To establish an account, request access by email to me or my colleague, Jim Margolin, Cc'd here, prior to Wednesday, November 29, 2021.

Please also note that all case filings in U.S. v. Maxwell are available in the Court's electronic filing system; we encourage media representatives to establish a free PACER account, if they have not done so already. Credentialing and other matters relating to in-person attendance for the trial are handled by the SDNY District Executive's Office.

Periodic updates to follow.

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