



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*

October 28, 2021

**BY ELECTRONIC MAIL**

Christian Everdell, Esq.

Mark Cohen, Esq.

Mark Cohen, Esq.  
Cohen & Gresser LLP

New York, NY

Laura Menninger, Esq.

Jeffrey Pagliuca, Esq.

Haddon, Morgan and Foreman, P.C.

Denver, CO

Bobbi Sternheim, Esq.

Law Offices of Bobbi C. Sternheim

**New York, NY**

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

Dear Counsel:

Today we are producing the materials listed in the below index. These materials are stamped with control numbers SDNY GM 02765768 through SDNY GM 02766974.

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.** The Department of Justice directed this office to cease the dissemination of materials marked with the word “confidential” in order to avoid potential confusion with markings reserved for classified documents. Accordingly, in order to note the appropriate designation of this production under the operative Protective Order in this case, the materials being produced today are marked with the following label: “SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17.” This marking directly refers to the specific paragraphs of the Protective Order that govern today’s production.

An index of the materials contained in this production is below:

<b>Bates Start</b>	<b>Bates End</b>	<b>Summary Description</b>	<b>Confidential Designation</b>
SDNY GM 02765768	SDNY GM 02765768	Scanned page of contact book	Confidential
SDNY GM 02765769	SDNY GM 02766967	Materials from Estate of Jeffrey Epstein <sup>1</sup>	Confidential
SDNY GM 02766968	SDNY GM 02766974	Records from the United Kingdom	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,

DAMIAN WILLIAMS  
United States Attorney

by:                    s/

**Assistant United States Attorneys**

<sup>1</sup> These materials appear to be largely duplicative of materials previously produced to you in discovery.