



**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 3, 2021

**BY ELECTRONIC MAIL**

Christian Everdell, Esq.  
Mark Cohen, Esq.  
Cohen & Gresser LLP  
[REDACTED]  
[REDACTED]

Laura Menninger, Esq.  
Jeffrey Pagliuca, Esq.  
Haddon, Morgan and Foreman, P.C.  
[REDACTED]  
[REDACTED]

Bobbi Sternheim, Esq.  
Law Offices of Bobbi C. Sternheim  
[REDACTED]  
[REDACTED]

**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\_02753399 through SDNY\_GM\_02753431.

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:

<b>Bates Start</b>	<b>Bates End</b>	<b>Summary Description</b>	<b>Confidential Designation</b>
SDNY_GM_02753399	SDNY_GM_02753431	Photographs	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