



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 14, 2021

BY ECF

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

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

Dear Judge Nathan:

The parties respectfully and jointly write to request an extension of time to file a letter in response to the Court's Order of May 11, 2021, requiring the parties to submit a joint letter regarding the overall pretrial schedule. (Dkt. No. 277). The joint letter is currently due on May 14, 2021, and the parties respectfully request an extension to May 21, 2021. No previous requests for an extension of this deadline have been made.

The parties seek this extension in order to permit continuation of productive discussions that the parties have already initiated regarding the pretrial schedule. The parties conferred yesterday for approximately 45 minutes by telephone on that topic. Although the conversation was productive, there remain multiple points of disagreement. The requested extension will permit the parties to consider each other's proposals as to certain deadlines, and to further confer with the aim of minimizing the points of disagreement that will need to be resolved by the Court.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney

By: _____ s/

Assistant United States Attorneys
Southern District of New York

Cc: Defense counsel (By ECF)