

**From:** David Oscar Markus <[REDACTED]>  
**To:** [REDACTED] (USANYS) <[REDACTED]>  
**Cc:** " [REDACTED]  
<[REDACTED]> [REDACTED] (USANYS)  
**Subject:** Re: U.S. v. Ghislaine Maxwell  
**Date:** Wed, 31 Mar 2021 15:01:54 +0000

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[REDACTED]

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  
[REDACTED]

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**From:** [REDACTED] (USANYS) <[REDACTED]>  
**Sent:** Thursday, March 25, 2021 7:10 PM  
**To:** David Oscar Markus  
**Cc:** [REDACTED]; Christian Everdell; Bobbi Sternheim ([REDACTED]);  
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,

[REDACTED]  
[REDACTED]  
Assistant United States Attorney  
Southern District of New York  
One Saint Andrew's Plaza  
New York, NY 10007  
[REDACTED]

**From:** David Oscar Markus <[REDACTED]>

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

**To:** [REDACTED]

(USANYS) <[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

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