

**From:** [REDACTED] " [REDACTED]"  
**To:** [REDACTED] (USANYS) [Contractor]" [REDACTED]  
**Subject:** FW: U.S. v. Maxwell, Case No. 20 Cr. 330 (AJN) [Maxwell's Resp to Govs Motn to Preclude Testimony of Dietz and Loftus]

**Date:** Sat, 13 Nov 2021 16:25:10 +0000

**Attachments:** 2021.11.12\_Maxwell\_Response\_to\_Gov\_Motion\_to\_Exclude\_Dietz\_and\_Loftus.pdf; Ex.\_1.pdf; Ex.\_2.pdf

**Inline-Images:** image001.jpg

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Hey [REDACTED] – this is the last thing for the binder. Thanks!

[REDACTED]

**From:** Nicole Simmons [REDACTED]  
**Sent:** Friday, November 12, 2021 8:55 PM  
**To:** 'Nathan NYSD Chambers' [REDACTED]  
**Cc:** Jeff Pagliuca [REDACTED]; Laura Menninger [REDACTED]

[REDACTED]

**Subject:** [EXTERNAL] U.S. v. Maxwell, Case No. 20 Cr. 330 (AJN) [Maxwell's Resp to Govs Motn to Preclude Testimony of Dietz and Loftus]

Dear Judge Nathan:

At the request of Jeffrey Pagliuca, please see attached Ms. Maxwell's Response to the Government's Motion *In Limine* to Preclude Expert Testimony of Dr. Park Dietz and Dr. Elizabeth Loftus along with supporting documents. Pursuant to our established protocol, we are submitting the Motion and Exhibits to the Court under temporary seal to allow the government to propose any redactions it deems necessary.

Regards,

Nicole

Nicole Simmons  
Haddon, Morgan and  
Foreman, P.C.

