

**From:** "[REDACTED]" <[REDACTED]>  
**To:** "[REDACTED] (USANYS)" <[REDACTED]>, "[REDACTED] (USANYS)" <[REDACTED]>  
**Cc:** "[REDACTED]" <[REDACTED]>, "[REDACTED] (USANYS)" <[REDACTED]>, "[REDACTED]" <[REDACTED]>  
**Subject:** RE: U.S. v. Maxwell, Case No. 20 Cr. 330 (AJN) [Ms. Maxwell's Motions in Limine]  
**Date:** Tue, 19 Oct 2021 13:50:26 +0000  
**Attachments:** Maxwell's\_Motions\_in\_Limine.zip  
**Inline-Images:** image001.jpg

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Oh sure! I've attached the zip file, but also happy to add you to the share drive if you like.

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**From:** [REDACTED] (USANYS) <[REDACTED]>  
**Sent:** Tuesday, October 19, 2021 9:19 AM  
**To:** [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>  
**Cc:** [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Subject:** RE: U.S. v. Maxwell, Case No. 20 Cr. 330 (AJN) [Ms. Maxwell's Motions in Limine]

Thanks, [REDACTED]. I don't seem to have access to the shared. Would you mind asking IT to add me and [REDACTED]? And/or emailing the PDF?

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**From:** [REDACTED] <[REDACTED]>  
**Sent:** Tuesday, October 19, 2021 12:15 AM  
**To:** [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>  
**Cc:** [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Subject:** FW: U.S. v. Maxwell, Case No. 20 Cr. 330 (AJN) [Ms. Maxwell's Motions in Limine]

The defense filed 13 motions in limine. I've attached their two cover letters, and the various motions are saved here:

<\\Usa.doj.gov\cloud\NYS\StAndrews\Shared\USvEpstein-2018R01618\!Trial\MIL\Defense MILs>

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**From:** Nicole Simmons <[REDACTED]>  
**Sent:** Monday, October 18, 2021 11:41 PM  
**To:** 'Nathan NYSD Chambers' <[REDACTED]>  
**Cc:** Jeff Pagliuca <[REDACTED]>; Laura Menninger <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>  
**Subject:** [EXTERNAL] U.S. v. Maxwell, Case No. 20 Cr. 330 (AJN) [Ms. Maxwell's Motions in Limine]

Dear Judge Nathan:

At the request of Jeffrey Pagliuca, please see attached Ms. Maxwell's Motions in Limine and supporting documents.

Regards,

Nicole Simmons

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

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