



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

November 9, 2021

BY ELECTRONIC MAIL

Christian Everdell, Esq.
Cohen & Gresser LLP
800 Third Avenue
New York, NY 10022

Laura Menninger, Esq.
Jeffrey Pagliuca, Esq.
Haddon, Morgan and Foreman, P.C.
150 East Tenth Avenue
Denver, CO 80203

Bobbi Sternheim, Esq.
Law Offices of Bobbi C. Sternheim
33 West 19th Street-4th Fl.
New York, NY 10007

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

Dear Counsel:

Today the Government is producing additional materials, including Jencks Act and *Giglio* material, regarding witnesses who may be called to testify at trial in the above-referenced case. Enclosed please find an index detailing the materials included in today's production.

Please note that this letter, the enclosed index, and the enclosed materials are governed by the July 31, 2020 Protective Order in this case. **In particular, the materials are designated as "confidential" under the Protective Order. The index is itself designated as "confidential," because it includes information regarding records designated as "confidential" under the Protective Order.** The Department of Justice directed this office to cease the dissemination of materials marked with the word "confidential" in order to avoid potential confusion with markings reserved for classified documents. Accordingly, in order to note the appropriate designation of this production under the operative Protective Order in this case, the materials being produced today are marked with the following label: "SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17." This marking directly refers to the specific paragraphs of the Protective Order that govern today's production.

Very truly yours,

DAMIAN WILLIAMS
United States Attorney

by: s/ _____
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
Assistant United States Attorneys