

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
UNITED STATES OF AMERICA,

v.

GHISLAINE MAXWELL,

Defendant.  
-----X

**AFFIDAVIT OF CERTIFICATION**  
**PURSUANT TO LOCAL**  
**CRIMINAL RULE 16.1**

20 Cr. 330 (AJN)

I, Christian R. Everdell, an attorney duly admitted to practice in New York State and before this Court, declare the following is true and correct under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am a partner at Cohen & Gresser LLP, counsel for defendant Ghislaine Maxwell in the above-captioned case.
2. I certify pursuant to Local Criminal Rule 16.1 that defense counsel has conferred in good faith with Assistant U.S. Attorneys [REDACTED], [REDACTED], and [REDACTED] regarding the government's proposed protective order pursuant to Federal Rule of Criminal Procedure 16.
3. While the parties have been able to agree on most of the provisions of the protective order, we have been unable to resolve two narrow areas of dispute.
  - a. *First*, the defense believes that potential government witnesses and their counsel should be subject to the same restrictions as the defense concerning appropriate use of the discovery materials—namely, if these individuals are given access to discovery materials during trial preparation, they may not use

those materials for any purpose other than preparing for trial in the criminal case, and may not post those materials on the Internet.

- b. *Second*, the defense believes it should not be restricted from publicly disclosing or disseminating the identity of any alleged victims or potential witnesses referenced in the discovery materials who have already identified themselves by speaking on the public record.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

Dated: July 27, 2020  
New York, New York

/s/ Christian R. Everdell  
Christian R. Everdell  
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