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June 16, 2022

VIA E-MAIL: [REDACTED]

Office of the United States Attorney
Southern District of New York
One Saint Andrews Plaza
New York, NY 10007
Attn: AUSAs [REDACTED]

Re: United States v. Maxwell

Dear Counsel:

We are attorneys for Alan Dershowitz ("Professor Dershowitz") in the civil matter of [REDACTED] v. *Alan Dershowitz* pending before Hon. Loretta Preska in the Southern District of New York. [REDACTED] lack of credibility, and actual conduct in recruiting young girls for Jeffrey Epstein, are critical issues in the above-mentioned litigation.

We write to notify you that [REDACTED] gave approximately nine hours of deposition testimony across the span of two days on April 13th and 14th, 2022, in Washington, D.C. Her lawyers have designated the entire transcript to date as confidential under the applicable protective order.

Our efforts to have the transcripts unsealed and made public have been denied by Judge Preska. Also denied was our request to provide the transcript to your office so that you could determine, on an informed basis, whether it would be appropriate or ethical for you to allow Ms. [REDACTED] to give a victim impact statement during the sentencing phase of the Ghislaine Maxwell trial and therein vouch in that proceeding for her credibility.

Both the Court, and [REDACTED] counsel, have made clear that they agree that we may notify you of the existence of the transcripts so that you can have the opportunity to review her testimony before she is allowed to provide a victim impact statement at the upcoming sentencing of Ghislaine Maxwell. We urge you, respectfully, to require her to produce it to you for your

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SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

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review and careful consideration before permitting her to make a victim impact statement. In furtherance of this request, we enclose for your consideration a letter from Professor Bruce Green regarding the ethical considerations applicable to this matter.

Please let me know if you have any questions or would like to discuss this matter further. We are copying [REDACTED] counsel here to help facilitate your request for her transcripts.

Yours, etc.



Imran H. Ansari



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Barry Kamins



John M. Leventhal

encl: Bruce Green Letter

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