



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

August 20, 2021

**VIA ECF**

The Honorable Alison J. Nathan  
United States District Court  
Southern District of New York  
United States Courthouse  
40 Foley Square  
New York, New York 10007

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

Dear Judge Nathan:

The Government writes in response to defense counsel's letter of August 19, 2021 (Dkt. No. 323). The Court denied defense counsel's sealed, *ex parte* motion for an order authorizing four Rule 17(c)(3) subpoenas in a sealed opinion dated August 13, 2021, and the Court ordered defense counsel to inform the Court whether they seek any sealing or redactions. (Dkt. No. 318). The defense has responded that they seek no redactions, and that they believe the burden to justify any redactions is on the Government. (Dkt. No. 323).

Because the Government does not have a copy of the sealed motion papers or the Court's Opinion and Order, the Government is unable to propose or justify any redactions. For instance, it appears that the motion papers include the names of victims and potential witnesses (*id.* at 1), which the Government would likely move to redact. The Government has conferred with defense counsel, who have informed the Government that they are unable to provide a copy of those documents absent further order of this Court. Accordingly, the Government moves for a limited

