



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*

October 11, 2021

BY EMAIL

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 respectfully submits this letter in connection with the Court's Order dated August 27, 2021 (Dkt. No. 330). The parties have conferred, in accordance with the Court's Order, and submit the enclosed joint proposed juror questionnaire and joint proposed voir dire. Where the parties disagree in the enclosed documents, the parties have so indicated and included the basis for the objections. In particular, the text proposed by the defense to which the Government objects is in green with specific objections in comment bubbles. The text proposed by the Government to which the defense objects is in purple with specific objections in comment bubbles.

The defense respectfully requests that the joint proposed juror questionnaire and joint proposed voir dire be filed under seal to avoid media coverage that may prejudice the jury selection process. The Government consents to the defense's request.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: _____ s/



Assistant United States Attorneys

Cc: Defense Counsel (by email)