

From: Gail Goodman [REDACTED]

To: "[REDACTED]" <[REDACTED]>

Cc: "[REDACTED]" <[REDACTED]>, "[REDACTED] (USANYS)" <[REDACTED]>

Subject: Re: [EXTERNAL] Re: Expert Witness

Date: Wed, 01 Dec 2021 00:42:23 +0000

Hi [REDACTED],

It turns out 6:30 pm CA time is fine. I will walk the dog now. We expect to go out to dinner at 7:30 pm.

Best,
Gail

On Tue, Nov 30, 2021 at 3:59 PM [REDACTED] <[REDACTED]> wrote:

Hi Dr. Goodman,

I'm sorry to do this again, but our window was once again disrupted. Can we try for 6:30 p.m. your time?

Thanks, and my apologies once more.

[REDACTED]

From: Gail Goodman <[REDACTED]>

Sent: Tuesday, November 30, 2021 1:37 PM

To: [REDACTED] <[REDACTED]>

Cc: [REDACTED] <[REDACTED]>, [REDACTED] (USANYS) <[REDACTED]>

Subject: Re: [EXTERNAL] Re: Expert Witness

Hello [REDACTED],

No problem. CA time 2:30 to 4:00 pm works fine. I have plenty to work on, and I know you all must be under a lot of pressure.

Best,
Gail

On Tue, Nov 30, 2021 at 10:12 AM [REDACTED] <[REDACTED]> wrote:

Hi Dr. Goodman,

Our lunch break is shorter than expected and we can't do the call at 10:30 your time. I'm so sorry - I know you changed your plans to be available. We should be free from 2:30 to 4 your time. Can we talk then if you still have that window available?

Thanks a lot, and our apologies again,

[REDACTED]

Sent from my iPhone

On Nov 30, 2021, at 12:51 AM, Gail Goodman <[REDACTED]> wrote:

Hi [REDACTED],

Tues at 10:30 am my time works fine. I'll change my plans and not be in my car then. The phone number you recounted is my cell ([REDACTED]), and it works either way, in car or not. Looking forward to talking with you.

Best,

Gail

Sent from my iPhone

On Nov 29, 2021, at 9:01 PM, [REDACTED] <[REDACTED]> wrote:

Hi Dr. Goodman,

Thanks a lot! We expect to have a lunch break from 10-11 your time, so why don't we try to give you a call at 10:30 your time on your car phone? Is that [REDACTED]?

If that time ends up not working, we can suggest some other times.

Thanks,

[REDACTED]

From: Gail Goodman <[REDACTED]>
Sent: Monday, November 29, 2021 11:29 PM
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: Re: [EXTERNAL] Re: Expert Witness

Hello [REDACTED],

I just saw your message. I am available tomorrow (Tuesday) to talk. However, I was not sure if you are free at 1 pm CA time (PST) or NY time (EST). Here is my schedule for Tuesday, Nov 30:

Available CA times:

9 am to 10 am

10:30 am to 12:00 pm (noon) on my car phone

1 pm to 2:00 pm

2:30 pm to 4:00 pm on my car phone

4:30 pm to 8:00 pm

While I will be available at 1 pm PST or EST, or in the evening Tuesday, it would be great to know which time you meant to make sure I leave time free and answer my cell phone ([REDACTED]).

Also, it is about 8:30 pm in CA so I assume now is too late for you, but I will be up for some time, if you get this message and want to talk tonight. Thank you for emailing me about a follow-up call.

Sincerely,

Gail

On Mon, Nov 29, 2021 at 6:50 PM [REDACTED] <[REDACTED]> wrote:

Hi Dr. Goodman,

I hope you had a nice weekend. Do you have a few minutes for a follow up call? We are available tonight or tomorrow evening, or tomorrow around 1.

Thanks,
[REDACTED]

From: Gail Goodman <[REDACTED]>
Sent: Wednesday, November 24, 2021 11:26 PM
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS)
<[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: [EXTERNAL] Re: Expert Witness

Hello Again,

Attached please find my vita. Also, here attached is a list of federal court trials in which I testified. In these cases, my expert testimony was for the prosecution. I have never testified in federal court for the defense.

I want to explain what I was saying in regard to misinformation--that it can actually make memory better. Imagine I said, "*When I called you today*, we had a nice discussion." This is a misleading question because I did not call you. As your memory for what really happened is still strong, this misinformation can make your memory for who called who *more* accurate. Findings such as these, as applied to memorable personally significant events, show that memory is not as subject to error as some contend. As I am not working for you at this time, I hope it is OK for me to explain this important effect, as you may find it helpful in your work down the road.

Sincerely,

Gail Goodman

Distinguished Professor

On Wed, Nov 24, 2021 at 5:11 PM Gail Goodman <[REDACTED]> wrote:

Hello,

I have attached several articles of mine that provide a sense of my research findings, especially on long-term memory for child sexual abuse experiences. I selected publications that are fairly "quick reads." I hope you find them of interest. I can follow this up with my vita and some associated information later tonight. Thank you, and Happy Thanksgiving!

Sincerely,

Gail Goodman

Distinguished Professor

On Wed, Nov 24, 2021 at 8:55 AM [REDACTED] <[REDACTED]>
wrote:

Dr. Goodman,

My colleagues, [REDACTED], [REDACTED], [REDACTED], and I are the prosecutors in the case of *United States v. Ghislaine Maxwell*, which is scheduled to go to trial beginning on November 29, 2021 in the Southern District of New York. We are reaching out because we would be interested in speaking with you about consulting with us and potentially testifying at the trial. Would it be possible to schedule a call to discuss?

Thanks very much,

[REDACTED]

[REDACTED]

Assistant United States Attorney

Southern District of New York

[REDACTED]

New York, New York 10007

[REDACTED]

[REDACTED]

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