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August 27, 2020

BY EMAIL

██████████, Esq.

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United States Attorney's Office
Southern District of New York
1 St. Andrew's Plaza
New York, NY 10007

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

Dear ██████████

We write to alert you to several problems with the discovery productions that have been provided to Ms. Maxwell in the MDC, and to register our dissatisfaction with the manner in which that discovery was provided.

First, according to Judge Nathan's scheduling order (Dkt. 25), the deadline for completing production of initial non-electronic discovery was Friday, August 21, 2020. Ms. Maxwell did not receive her copy of the third and final production in this phase of discovery until the late morning on Tuesday, August 25, several days after the deadline imposed by the court. It is critical that Ms. Maxwell receive her copy of the discovery productions in a timely manner and on the schedule set by the court. We trust that the government will abide by these deadlines as it produces the remainder of the discovery by November 9, 2020.

Second, Ms. Maxwell has experienced numerous difficulties reviewing the documents provided to her in discovery. For example, she cannot open any of the documents listed in the chart below. Ms. Maxwell also cannot open any audio or video files.¹

Accordingly, we request that the government (1) immediately reproduce to Ms. Maxwell, on a new hard drive, the entire set of initial non-electronic discovery (Bates numbers SDNY_GM_00000001 – SDNY_GM_00174966) in a format that she can access on her computer

¹ On our call earlier today, you indicated that you received word from ██████████ at the MDC that the problem with the audio and video files may have been resolved. We have not been able to confirm this with Ms. Maxwell, but we will do so the next time we speak with her. If the problem has not been resolved, we will notify you.

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at the MDC, and (2) provide the appropriate software tools that will allow her to review all of the discovery files.

Discovery Drive No	Bates Numbers
Discovery Drive 1	963-1284
	3699-3700
	3703-4639
	4791
	5417
	5431-5432
	5435
	5487-5488
	5490-5491
	6007-6010
	6097-6129
	6130-7086
	7426-7461
	7521-7581
	7654-7650
	7666
	7676-7677
	9087-9088
	11489-11491
	12200
	12217
	12305
	12359
	12376
	12382
	12396
Discovery Drive 2	20171
	20182
	20225
	20269
	20277
	20333
	20335
	20337
	23699
	29787

[REDACTED], [REDACTED], [REDACTED]

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	36700
	68242
	68243-68244
Discovery Drive 3	76863-78659
	78660-81546
	86557-96055
	96056-110316
	153906
	155211-156068
	156069-157024
	157025-157521
	157522-157588
	157589-157617
	157618-159387
	161772-164232
	164817-164919
	164920-165517

Thank you in advance for your assistance in this matter.

Sincerely,

/s/ Christian Everdell
Christian R. Everdell
COHEN & GRESSER LLP
800 Third Avenue, 21st Floor
New York, New York 10022
[REDACTED]

cc: Mark S. Cohen, Esq.
Jeff Pagliuca, Esq.
Laura Menninger, Esq.