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Patrick J. Smith

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November 15, 2021

**BY E-MAIL to** [REDACTED]  
The Honorable Alison J. Nathan  
United States District Judge  
Southern District of New York  
[REDACTED]  
New York, New York 10007

**Re: United States v. Maxwell, No. 20 Cr. 330**

Dear Judge Nathan:

We represent [REDACTED] the independent administrator of the Epstein Victims' Compensation Program, the litigation-alternative program established to confidentially resolve claims of sexual abuse against Jeffrey Epstein, his Estate, and other related individuals and entities. This afternoon we were informed by counsel for the government that the defendant has sought, and the Court intends to authorize, a subpoena directed to [REDACTED] under Federal Rule of Criminal Procedure 17(c) for certain documents. We write to (i) inform the Court that we are authorized to accept service of the subpoena on behalf of [REDACTED] and (ii) request a briefing schedule for [REDACTED] anticipated motion to quash the subpoena.

We understand that the government intends to file a motion to quash the subpoena, with a deadline of this Wednesday, November 17, 2021. Given that we have just learned of the subpoena today, the issues it presents, and mindful of the impending start date of trial, we respectfully request until November 23, 2021 to file a motion to quash on [REDACTED] behalf.

We are available should the Court have any questions.

Respectfully submitted,

/s/ Patrick J. Smith

Patrick J. Smith  
Smith Villazor LLP

cc:

[REDACTED], Christian R. Everdell, Esq., Jeffrey S. Pagliuca, Esq., Laura A. Menninger, Esq., Mark Stewart Cohen, Esq., Bobbi C. Sternheim, Esq. (by e-mail)

[REDACTED] may file a motion to quash the subpoena on or before Friday, November 19, 2021. The motion should not repeat arguments made in the Government's motion to quash, which is due on Thursday, November 18, 2021. The Defense shall respond to both motions on or before Monday, November 22, 2021. This memo endorsement is filed temporarily under seal to allow the parties to propose redactions. Any redactions to this letter and the Defendant's motion must be filed on the docket by November 21, 2021. SO ORDERED.

11/15/21