

From: "[REDACTED] (USANYS)" <[REDACTED]>
To: "[REDACTED]" <[REDACTED]>
Subject: RE: [EXTERNAL] Re: Expert Witness
Date: Tue, 30 Nov 2021 05:00:24 +0000

Sounds good!

From: [REDACTED] <[REDACTED]>
Sent: Tuesday, November 30, 2021 12:00 AM
To: [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: [EXTERNAL] Re: Expert Witness

Let's try for tomorrow, and if we can't do it, we can't do it? I just want to get the notice out ASAP if we can!

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Monday, November 29, 2021 11:55 PM
To: [REDACTED] <[REDACTED]>
Subject: RE: [EXTERNAL] Re: Expert Witness

We can try to do that though I think that is 10-11 am her time and she is free at 10:30. We could also do it Wednesday if that would be better for you?

From: [REDACTED] <[REDACTED]>
Sent: Monday, November 29, 2021 11:50 PM
To: [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: [EXTERNAL] Re: Expert Witness

OK! Think it's insane to do it during the lunch break? I have preps from 7-8:30 and need some space in case we have an emergency letter, so am nervous about doing it tomorrow night.

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Monday, November 29, 2021 11:49 PM
To: [REDACTED] <[REDACTED]>
Subject: RE: [EXTERNAL] Re: Expert Witness

Yeah, we should have them on with us. Let's just do tomorrow?

From: [REDACTED] <[REDACTED]>
Sent: Monday, November 29, 2021 11:46 PM
To: [REDACTED] (USANYS) <[REDACTED]>
Subject: FW: [EXTERNAL] Re: Expert Witness

Want to call Dr. Goodman? We should have an agent on, though – not sure if [REDACTED] are reachable?

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