



PATRICK J. SMITH
T 212 582 4400
patrick.smith@smithvillazor.com

November 23, 2021

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

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

The parties are ORDERED to docket any proposed redactions to this memo endorsement and Administrator Feldman's letter by close of business on November 24, 2021. The Court will not extend the deadline for the parties' proposed protective order, which must be submitted by 12:00 p.m. today. SO ORDERED.

Dear Judge Nathan:



11/24/21

We represent Jordana H. Feldman, the independent administrator of the Epstein Victims' Compensation Program. We write regarding the Court's order, dated November 22, 2021, denying Ms. Feldman's motion to quash Maxwell's subpoena to her and ordering production of the subpoenaed documents by November 24, 2021 at noon.

Ms. Feldman intends to comply with the Court's order and produce responsive documents to the Court. However, given the volume of materials and the steps necessary to ensure that documents produced fall within the scope of the subpoena, it is not possible to produce all materials by noon tomorrow. We understand that the volume of potentially responsive materials is approximately 6,000 to 7,000 pages, and we note that the original return date for the subpoena was November 29, 2021 at 8:30am.

We intend to produce by noon tomorrow documents consisting of claim forms and any narratives signed by the four individuals identified in the subpoena, payment records, and releases executed by the four individuals. We intend to produce remaining responsive documents as soon as possible thereafter and respectfully request until November 29, 2021 at 8:30am (the original subpoena return date) to complete production.

SO ORDERED.

We are available should the Court have any questions.

Respectfully submitted,

/s/ Patrick J. Smith

Patrick J. Smith
Smith Villazor LLP

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