

PETER M. SKINNER
[REDACTED]

April 18, 2019

VIA ELECTRONIC MAIL
[REDACTED]

United States Attorney's Office for the
Southern District of New York
[REDACTED]

New York, New York 10007
[REDACTED]

***FOIA CONFIDENTIAL TREATMENT REQUESTED /
FED. R. CRIM. P. 6(e) MATERIAL***

Re: Grand Jury Subpoena Investigation

Dear [REDACTED]:

I write on behalf of Boies Schiller Flexner LLP ("BSF") with regard to a grand jury subpoena, dated February 5, 2019, that you directed to this firm (the "Subpoena"). I am also in receipt of the Sealed Order, 19 Misc. 149, signed by Judge McMahon and dated April 9, 2019. Pursuant to that Order, we are producing the following materials in response to the Subpoena that are covered by the March 18, 2016 Protective Order entered in [REDACTED] v. *Maxwell*, 15 Civ. 7433 (RWS):

All deposition transcripts	All related deposition exhibits
All expert deposition transcripts	All related expert deposition transcripts
Plaintiff's Productions	[REDACTED]000001 – [REDACTED]005485
Defendant's Productions	GM_00015 – GM_01364
Non-Party Productions	CASELL 000001 - CASELL 014402
	MAR-A-LAGO 0001 – MAR-A-LAGO 0607
	[REDACTED]_000001 – [REDACTED]_000558
	RG(UK)_000001 – RG(UK)_000009
	VICTIMS_REFUSE_SILENCE_0001-0091

The documents can be accessed through our secure BSF sharefile site which we will send a link to separately with instructions to access the documents. Additional materials will be provided on a rolling basis.

BOIES SCHILLER FLEXNER LLP

[REDACTED]

United States Attorney's Office for the
Southern District of New York

Page 2

BSF respectfully requests that this letter and the enclosed production be treated as confidential. These materials have been designated "FOIA Confidential Treatment Requested / Fed. R. Crim. P. 6(e) material," and are provided pursuant to and in reliance on the confidentiality provisions of Rule 6(e) of the Federal Rules of Criminal Procedure. BSF further respectfully requests that this letter and the enclosed production be treated as confidential under the Freedom of Information Act ("FOIA"), including pursuant to 5 U.S.C. §§ 552(b)(3), (b)(4), (b)(6), and (b)(7), as well as the FOIA regulation, 28 C.F.R. § 16.8. BSF further respectfully requests confidential treatment of this letter and the enclosed production under the Privacy Act of 1974, 5 U.S.C. § 552a, as well as the provisions of 18 U.S.C. § 1905. By submitting these materials, BSF does not intend to and does not waive the protections of the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or protection.

In the event that the Government receives a FOIA request for any documents provided by BSF, we ask that you please immediately notify us at the numbers above. Likewise, if the Government, for whatever reason, determines to release the materials, we ask that you notify us so that BSF can substantiate its request for confidential treatment, object, or pursue any other available remedies. Finally, should the Office determine to share BSF's production with any other federal agency, please forward a copy of this letter, as well, and indicate that BSF has requested confidential treatment of materials.

If you have any questions about BSF's production, or would like to speak further, please feel free to call us at the numbers above.

Very truly yours,

/s Peter M. Skinner

Peter M. Skinner