



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

December 16, 2020

**BY ECF**

The Honorable Alison J. Nathan  
United States District Court  
Southern District of New York  
United States Courthouse  
40 Foley Square  
New York, New York 10007

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

Dear Judge Nathan:

Pursuant to the Court's December 7, 2020 Order (Dkt. 89), the Government respectfully submits under seal an unredacted version of its memorandum of law and two accompanying exhibits in opposition to the defendant's renewed motion for bail. Additionally, the Government respectfully submits proposed redactions to its memorandum of law. Consistent with the redactions contained in the defense motion, the Government's proposed redactions are narrowly tailored to cover (1) information implicating the privacy interests of third parties previously articulated by the defense (Dkt. 86), and (2) Confidential Material produced by the Government in discovery and governed by paragraph 15 of the Protective Order in this case (Dkt. 36).

Respectfully submitted,

AUDREY STRAUSS  
Acting United States Attorney

By:

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Assistant United States Attorneys  
Southern District of New York

Tel: \_\_\_\_\_

Cc: All Counsel of Record (By email)