

**From:** Christian Everdell <[REDACTED]>

**To:** "[REDACTED]" <[REDACTED]>, "Mark S. Cohen"

<[REDACTED]>

**Cc:** "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>

**Subject:** RE: SDNY indictment

**Date:** Tue, 07 Jul 2020 00:43:41 +0000

**Attachments:** 2020.07.06\_Letter\_to\_Judge\_Nathan.DOCX

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[REDACTED] -

Attached is our letter to Judge Nathan. We will file before 9pm unless we hear otherwise from you.

Thanks,

Chris

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**From:** [REDACTED] [mailto:[REDACTED]]  
**Sent:** Monday, July 06, 2020 5:36 PM  
**To:** Christian Everdell; Mark S. Cohen  
**Cc:** [REDACTED]; [REDACTED]  
**Subject:** RE: SDNY indictment

Chris and Mark,

In light of Judge Nathan's order, are you available for a call this evening to discuss scheduling? We are available at 6, if that works for you.

Thanks,

[REDACTED]

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**From:** Christian Everdell <[REDACTED]>  
**Sent:** Monday, July 6, 2020 1:23 PM  
**To:** [REDACTED] <[REDACTED]>  
**Cc:** Mark S. Cohen <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Subject:** RE: SDNY indictment

Thanks, [REDACTED].

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**From:** [REDACTED] [mailto:[REDACTED]]  
**Sent:** Monday, July 06, 2020 1:22 PM  
**To:** Christian Everdell  
**Cc:** Mark S. Cohen; [REDACTED]; [REDACTED]  
**Subject:** RE: SDNY indictment

Chris,

Ms. Maxwell's BOP number is [REDACTED]. My understanding is that she has arrived in SDNY and will be housed at the MDC.

I will send an email connecting you with Pretrial Services shortly.

Best,

[REDACTED]  
Assistant United States Attorney  
Southern District of New York  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

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**From:** Christian Everdell <[REDACTED]>  
**Sent:** Monday, July 6, 2020 1:15 PM  
**To:** [REDACTED] <[REDACTED]>  
**Cc:** Mark S. Cohen <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Subject:** RE: SDNY indictment

[REDACTED] -

Can you tell me what Ms. Maxwell's BOP number is? She is not in the BOP system yet.

Thanks,

Chris

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**From:** [REDACTED] [mailto:[REDACTED]]  
**Sent:** Sunday, July 05, 2020 9:03 PM  
**To:** Christian Everdell  
**Cc:** Mark S. Cohen; [REDACTED]; [REDACTED]  
**Subject:** RE: SDNY indictment

Attached please find a copy of the letter we just filed on ECF.

Thanks,

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**From:** [REDACTED]  
**Sent:** Sunday, July 5, 2020 8:23 PM  
**To:** 'Christian Everdell' <[REDACTED]>  
**Cc:** Mark S. Cohen <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Subject:** RE: SDNY indictment

We can make that work, thanks. We will note in the letter that the parties propose the defense submission be due at 3pm on Thursday, any reply be due at 12pm on Friday, and the court appearance take place Friday afternoon.

Thanks,

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**From:** Christian Everdell <[REDACTED]>

**Sent:** Sunday, July 5, 2020 7:38 PM

**To:** [REDACTED] <[REDACTED]>

**Cc:** Mark S. Cohen <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED]

<[REDACTED]>

**Subject:** Re: SDNY indictment

We will need until 3pm on Thursday. Let us know if that's a problem.

Thanks,

Chris

Sent from my iPhone

On Jul 5, 2020, at 6:40 PM, [REDACTED] <[REDACTED]> wrote:

Understood, thanks. Would you agree to a 12pm Thursday deadline for your submission, and a 12pm Friday deadline for any written response from us, followed by the arraignment and bail hearing Friday afternoon? If so, we'll propose that to the Court.

We will reach out to Pretrial Services tomorrow to arrange for an interview.

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**From:** Christian Everdell <[REDACTED]>

**Sent:** Sunday, July 5, 2020 5:49 PM

**To:** [REDACTED] <[REDACTED]>; Mark S. Cohen <[REDACTED]>

**Cc:** [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>

**Subject:** RE: SDNY indictment

Thanks, [REDACTED]. We are planning to make a bail submission on Thursday, subject to being able to communicate with our client. So we will need your help to arrange an interview with Pretrial Services.

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**From:** [REDACTED] [mailto:[REDACTED]]

**Sent:** Sunday, July 05, 2020 5:31 PM

**To:** Christian Everdell; Mark S. Cohen

**Cc:** [REDACTED]; [REDACTED]

**Subject:** RE: SDNY indictment

Thanks Chris. We will request that the arraignment take place this Friday and will note your consent.

Are you planning to file a written submission in support of a bail application in advance of Friday? If so, would it make sense for us to include a proposed briefing schedule in our letter?

Along those same lines, please let us know if you need assistance coordinating an interview with Pretrial Services, which will need to take place in advance of any bail application.

Best,

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**From:** Christian Everdell <[REDACTED]>  
**Sent:** Sunday, July 5, 2020 5:25 PM  
**To:** [REDACTED] <[REDACTED]>; Mark S. Cohen <[REDACTED]>  
**Cc:** [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Subject:** RE: SDNY indictment

Hi [REDACTED] –

We would prefer that the arraignment take place on Friday, rather than Wednesday, and will consent to an exclusion of speedy trial time until Friday. I don't think a call is necessary, but let me know if you want to discuss.

Thanks,

Chris

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**From:** [REDACTED] <[REDACTED]> [mailto:[REDACTED]]  
**Sent:** Sunday, July 05, 2020 5:18 PM  
**To:** Mark S. Cohen; Christian Everdell  
**Cc:** [REDACTED]; [REDACTED]  
**Subject:** RE: SDNY indictment

Chris and Mark,

We are planning to submit a letter to Judge Nathan this evening informing her that the Marshals expect Ms. Maxwell to arrive in SDNY in time for a court appearance this Wednesday, requesting that the Court schedule an arraignment, and requesting the exclusion of time through the arraignment date. We intend to seek the exclusion of time both for the transportation of the defendant from another district and to allow for us to discuss the terms of a protective order to cover discovery in this case.

If possible, we would like to include your views in that letter. Would you please let us know whether you have any preferences on scheduling and whether you will consent to the exclusion of speedy trial time?

We are also happy to have a call if that would be useful.

Thanks,

[REDACTED]

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**From:** Mark S. Cohen <[REDACTED]>  
**Sent:** Friday, July 3, 2020 12:12 PM  
**To:** Christian Everdell <[REDACTED]>  
**Cc:** [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Subject:** Re: SDNY indictment

Thanks very much, [REDACTED]  
My mobile is 917-608-8612  
Best  
Mark

On Jul 3, 2020, at 11:44 AM, Christian Everdell <[REDACTED]> wrote:

Thanks, [REDACTED]. My cell is [REDACTED]

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**From:** [REDACTED] ([mailto:\[REDACTED\]](mailto:[REDACTED]))  
**Sent:** Friday, July 03, 2020 11:42 AM  
**To:** Christian Everdell; [REDACTED]; Mark S. Cohen  
**Cc:** [REDACTED]  
**Subject:** RE: SDNY indictment

Chris and Mark,

We are working with the USMS in New Hampshire to add you both to the list of attorneys who may contact your client while she is detained there. To that end, the NH USMS have asked for the best phone numbers to contact you two. Would you please let me know what numbers to provide?

Thanks,

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**From:** Christian Everdell <[REDACTED]>  
**Sent:** Thursday, July 2, 2020 8:48 PM  
**To:** [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; Mark S. Cohen <[REDACTED]>; [REDACTED]  
**Cc:** [REDACTED] <[REDACTED]>  
**Subject:** RE: SDNY indictment

Thanks, [REDACTED]. We'll speak to you then.

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**From:** [REDACTED] ([mailto:\[REDACTED\]](mailto:[REDACTED]))  
**Sent:** Thursday, July 02, 2020 6:20 PM  
**To:** Christian Everdell; [REDACTED]; Mark S. Cohen; [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: SDNY indictment

Chris,

Some combination of the SDNY team will be available for a call tomorrow at 10am. We can use the below conference line:

Dial-in: [REDACTED]  
Passcode: [REDACTED]

Thanks,

[REDACTED]  
Assistant United States Attorney  
Southern District of New York

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

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**From:** Christian Everdell <[REDACTED]>

**Sent:** Thursday, July 2, 2020 5:55 PM

**To:** [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>;  
Mark S. Cohen <[REDACTED]>; [REDACTED]

**Cc:** [REDACTED] <[REDACTED]>

**Subject:** RE: SDNY indictment

[REDACTED] -

Are you free for a call with Mark and me tomorrow at 10am? I realize it is a holiday, so we'll try to keep it brief.

Let me know if that works for you.

Thanks,

Chris

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**From:** [REDACTED] [mailto:[REDACTED]]

**Sent:** Thursday, July 02, 2020 4:18 PM

**To:** Christian Everdell; [REDACTED]; Mark S. Cohen; [REDACTED]

**Cc:** [REDACTED]

**Subject:** Re: SDNY indictment

Chris,

We will need to put in a scheduling letter to the judge today. Would it be possible to discuss the below on a conference call together at 4:30? If so, we can use the same call in info as before.

thanks,

[REDACTED].

On Jul 2, 2020, at 15:04, [REDACTED] <[REDACTED]> wrote:

Chris,

In addition to our question regarding the exclusion of speedy trial time, we've been asked by chambers to ask whether the defense expects to make a bail application before the district judge, and if so, if you know when that application will occur. I realize you may not know the answer to those questions, and that the answer also may depend on precisely when the arraignment occurs, but we pass along those queries as requested by the Court.

thank you,

[REDACTED].

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**From:** [REDACTED]

**Sent:** Thursday, July 02, 2020 11:08

**To:** Christian Everdell <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; Mark S. Cohen <[REDACTED]>; [REDACTED]

**Cc:** [REDACTED] <[REDACTED]>

**Subject:** RE: SDNY indictment

Chris,

[REDACTED] is having a brief connectivity issue and asked me to respond – we're available for a call at 11:15, and I'll send a dial-in momentarily.

thanks,

[REDACTED]

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**From:** Christian Everdell <[REDACTED]>  
**Sent:** Thursday, July 02, 2020 11:02  
**To:** [REDACTED] <[REDACTED]>; Mark S. Cohen <[REDACTED]>; [REDACTED]  
**Cc:** [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Subject:** RE: SDNY indictment

[REDACTED] –

Are you free for a call at 11:15?

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**From:** [REDACTED] ([mailto:[REDACTED]])  
**Sent:** Thursday, July 02, 2020 10:08 AM  
**To:** Christian Everdell; Mark S. Cohen; [REDACTED]  
**Cc:** [REDACTED]; [REDACTED]  
**Subject:** RE: SDNY indictment

Following up, the District of New Hampshire has informed us that local counsel will need to appear for Ms. Maxwell at the presentment this afternoon.

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**From:** [REDACTED]  
**Sent:** Thursday, July 2, 2020 9:20 AM  
**To:** [REDACTED]; [REDACTED]; [REDACTED]  
**Cc:** [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Subject:** SDNY indictment

Chris, Mark, and Jeff,

We are writing to inform you that the FBI arrested your client, Ghislaine Maxwell, this morning in Bradford, New Hampshire. I have attached the indictment and arrest warrant, which we are providing to you as a courtesy while we seek the formal unsealing of the indictment in SDNY this morning. We will let you know when a district judge is assigned in SDNY. The defendant is currently being transported for arrest processing by the FBI, and our current expectation is that she will be presented this afternoon in the District of New Hampshire, via remote proceedings. We will update you as we learn more.

[REDACTED], [REDACTED], and I are available for a call later this morning, if that would be useful. Please let us know what time would be convenient for you.

Thanks,

[REDACTED]

[REDACTED]

Assistant United States Attorney  
Southern District of New York

[REDACTED]  
[REDACTED]  
[REDACTED]

