

From: "[REDACTED]" <[REDACTED]>

To: [REDACTED]
[REDACTED]

Subject: FW: [EXTERNAL] RE: United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)

Date: Tue, 02 Nov 2021 16:04:48 +0000

Hi all,

Could you please pull these bates ranges from the JPMC subpoena productions and save them in the Q&A folder for a witness named Patrick McLugh? He works at JPMC and will be testifying.

Thanks!

From: Stoddart, Allison <Allison.Stoddart@wilmerhale.com>

Sent: Tuesday, November 2, 2021 10:57 AM

To: [REDACTED] <[REDACTED]>

Cc: Sahni, Anjan <Anjan.Sahni@wilmerhale.com>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED]
[REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>

Subject: RE: [EXTERNAL] RE: United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)

[REDACTED]

As we discussed last week, below are the Bates ranges of the account opening documents for three accounts that appear in the exhibits that you provided:

- Account Number W23560001: JPM-SDNY-00001896 to JPM-SDNY-00001943
- Account Number 739474324: JPM-SDNY-00002398 to JPM-SDNY-00002439
- Account Number Q79961001: JPM-SDNY-00001829 to JPM-SDNY-00001849

Additionally, JPM-SDNY-00002539 to JPM-SDNY-00002570 contains onboarding documents for Ghislaine Maxwell, but they are not necessarily associated with Account Number 739116312.

Please let us know if you have any questions.

Thanks,
Allison

From: [REDACTED] <[REDACTED]>

Sent: Wednesday, October 27, 2021 9:02 AM

To: Stoddart, Allison <Allison.Stoddart@wilmerhale.com>

Cc: Sahni, Anjan <Anjan.Sahni@wilmerhale.com>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED]
[REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>

Subject: RE: [EXTERNAL] RE: United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)

EXTERNAL SENDER

Hi Allison,

Thanks— would 3 p.m. work for a call today?

EFTA00087570

From: Stoddart, Allison <Allison.Stoddart@wilmerhale.com>

Sent: Wednesday, October 27, 2021 7:48 AM

To: [REDACTED] <[REDACTED]>

Cc: Sahni, Anjan <Anjan.Sahni@wilmerhale.com>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>

Subject: RE: [EXTERNAL] RE: United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)

Hi [REDACTED],

We wanted to provide an update on the trial witness topic. Do you have any time this afternoon or tomorrow for a brief call?

Thanks,
Allison

From: Stoddart, Allison

Sent: Monday, October 18, 2021 9:05 PM

To: [REDACTED] <[REDACTED]>

Cc: Sahni, Anjan <Anjan.Sahni@wilmerhale.com>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>

Subject: RE: [EXTERNAL] RE: United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)

Great. Thanks, [REDACTED]. Appreciate it.

Allison

From: [REDACTED] <[REDACTED]>

Sent: Monday, October 18, 2021 8:58 PM

To: Stoddart, Allison <Allison.Stoddart@wilmerhale.com>

Cc: Sahni, Anjan <Anjan.Sahni@wilmerhale.com>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>

Subject: RE: [EXTERNAL] RE: United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)

EXTERNAL SENDER

Hi Allison,

Thanks, that's not a problem. I'm attaching a broadly worded subpoena to the bank, but please let me know if you'd like me to direct this more specifically to a particular entity or officer.

Thanks,

[REDACTED]

From: Stoddart, Allison <Allison.Stoddart@wilmerhale.com>

Sent: Monday, October 18, 2021 8:57 AM

To: [REDACTED] <[REDACTED]>

Cc: Sahni, Anjan <Anjan.Sahni@wilmerhale.com>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>

Subject: RE: [EXTERNAL] RE: United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)

EFTA00087571

██████, Maurene, Lara,

Following up on our last discussion, JPMorgan is working on identifying a witness for trial. Are you able to provide JPMorgan with a trial appearance subpoena?

Thanks very much,

Allison

Allison Stoddart | WilmerHale

7 World Trade Center

250 Greenwich Street

New York, NY 10007 USA

+1 212 295 6401 (t)

allison.stoddart@wilmerhale.com

From: ██████████ <██████████>

Sent: Friday, October 8, 2021 12:15 PM

To: Stoddart, Allison <Allison.Stoddart@wilmerhale.com>

Cc: Sahni, Anjan <Anjan.Sahni@wilmerhale.com>; ██████████ (USANYS) <██████████>; ██████████ <██████████>; ██████████ <██████████>

Subject: Re: [EXTERNAL] RE: United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)

EXTERNAL SENDER

Hi Allison,

I'm traveling for work for much of next week, but I'm available for a call anytime on Monday, or at 9 a.m. on Tuesday. I'm also available for a call this afternoon anytime from 4 pm onwards if that's easier.

Thanks.

On Oct 8, 2021, at 11:18 AM, Stoddart, Allison <Allison.Stoddart@wilmerhale.com> wrote:

Thanks, ██████████. Could we find some time early next week to discuss? Are there certain windows that would work on your end?

Thanks,
Allison

Allison Stoddart | WilmerHale

7 World Trade Center

250 Greenwich Street

New York, NY 10007 USA

+1 212 295 6401 (t)

allison.stoddart@wilmerhale.com

From: ██████████ <██████████>

Sent: Friday, October 8, 2021 10:01 AM

To: Sahni, Anjan <Anjan.Sahni@wilmerhale.com>; Stoddart, Allison <Allison.Stoddart@wilmerhale.com>

Cc: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>;
[REDACTED] <[REDACTED]>

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

EXTERNAL SENDER

Anjan, Allison,

Hope you're both doing well. Following up on our last conversation, we wanted to send along a few documents in order to facilitate our conversation about identifying an appropriate witness from JP Morgan. Attached is a zip file containing a few draft exhibits. We are still working on finalizing exhibits, but we thought it made sense to start the conversation about this sooner rather than later. Please let us know if you have any questions or if a call would be useful.

Thanks,

[REDACTED]

[REDACTED]

Assistant United States Attorney
Southern District of New York
One Saint Andrew's Plaza
New York, NY 10007
[REDACTED]