



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

March 22, 2021

BY ECF & ELECTRONIC MAIL

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:

In accordance with the Court's March 18, 2021 order (the "Order"), the parties have met and conferred regarding proposed redactions to Exhibit 11 and the defendant's cover letter dated March 9, 2021. The parties have reached an agreement regarding redactions as to Exhibit 11 and the defendant's cover letter.

The Government intends to file its omnibus memorandum of law and the corresponding exhibits consistent with the Court's Order, with one exception to which the defense consents. In particular, the defense has indicated that it no longer wishes the Government to remove the redactions the Government had originally proposed to pages 118 to 119 of the Government's brief. Those redactions refer to and quote portions of an exhibit filed under seal by the defense and which the Government understands is filed under seal in ██████ v. *Maxwell*, 15 Civ. 7433 (LAP). Accordingly, the Government has kept those redactions in the attached omnibus memorandum of law.

Additionally, the Government wishes to note that some portions of the defense's proposed redactions, which the Court adopted in the Order, would redact language that is contained in the publicly-filed Indictment in this case. In particular, the additional redactions proposed by the defendant to pages 129 to 134 on March 9, 2021 relate to language that is quoted in Count Six of the publicly filed Indictment in this case. Although the Government sees no basis under the prevailing case law to redact language that is already publicly available on the docket in this case, the Government is prepared to file the brief with redactions consistent the Order. The Government further notes that the defense also requested earlier today an additional redaction to the bottom of page 134, which is reflected in a red box in the enclosed memorandum. In the interest of expediency and in light of the Court's Order relating to pages 129 to 134, the Government is prepared to file the brief with this additional redaction should the Court so order. The Government again notes, however, that the defendant's new proposal would redact language related to

information that is publicly available in the Indictment that is on the docket in this case.

The Government respectfully submits under seal the enclosed version of its memorandum of law with proposed redactions consistent the Court's Order, the redactions originally proposed by the Government and contained on pages 118 to 119, and the additional redaction proposed by the defendant on page 134.

Accordingly, the Government respectfully requests that the Court permit the Government to publicly file its memorandum of law with the enclosed proposed redactions.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney

By: s/ _____

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Assistant United States Attorneys
Southern District of New York

Cc: All Counsel of Record (By email)