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April 19, 2021

The Hon. Alison J. Nathan  
United States District Court Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *United States v. Ghislaine Maxwell*, 20 Cr. 330 (AJN)  
Redactions to Pleadings Re: Rule 17 Subpoenas

Dear Judge Nathan:

Counsel for Ms. Maxwell has conferred with Boies Schiller & Flexner (BSF) concerning any proposed redactions to the pleadings addressing the Rule 17(c) subpoena *sub judice*, specifically Defendant's Response of April 2 and BSF's Reply of April 5, both of which were submitted to the Court via email in order to allow an opportunity to address any necessary redactions.

Ms. Maxwell is mindful of the Court's previous directive that any proposed redactions must be specifically justified and tailored yet is obligated by the Protective Order at ¶ 6 to seek to redact two references to an individual's name and description of that witness that were contained in the Response and Reply. Those two references are highlighted on the attached exhibits.

Those two references were derived from a document that the government marked "Confidential." The Court previously upheld the government's requested redaction of that individual's name from its Omnibus Response to Ms. Maxwell's Pretrial Motions and its accompanying Exhibit 7 (Dkt. No. 204-7), an email between the government and, *inter alia*,

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Ms. McCawley of BSF. It is the privacy rights of this third-party witness (who is separately facing criminal charges in France on related matters) that would be implicated by any public release.

Because BSF does not know what materials have been exchanged in this criminal action or what has been designated confidential, BSF takes no position on whether the Defendant's proposed redactions are necessary.

Respectfully submitted,



Laura A. Menninger