

Strictly Private and Confidential

Date 21st April 2021

Hon. Alison J. Nathan
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Our Ref MJM/TAY0/1

Your Ref:

By Email ONLY [REDACTED]

Dear Judge Nathan,

STRICTLY PRIVATE AND CONFIDENTIAL

We represent [REDACTED] a former PA to Ghislaine Maxwell.

We are writing to you ahead of Maxwell's upcoming criminal trial to request that all variations of our client's name be redacted from court papers. We have copied both the Prosecutor and Defence lawyer into this email.

We are mindful of the Order of District Judge Alison J. Nathan dated April 19th 2021 requiring any requests for redaction of documents by today – April 21st 2021. This letter/email is such a request.

In the previous defamation proceedings between [REDACTED] and Ghislaine Maxwell, our client was not initially made aware by the court or any of the representatives of the parties of the availability to make an application for her name to be redacted at all. As such her name was released and was published widely in the British press and online.

For the avoidance of doubt, our client has reported sexual crimes committed against her to the Metropolitan Police in London. As such, as a matter of law in the United Kingdom she has a lifelong entitlement to anonymity. See: Section 1 of the Sexual Offences (Amendment) Act ("SO(A)A") 1992.

Having been unaware of (1) the intended release of court documents containing information which named our client, and (2) her right to apply for redaction, our client's name was not redacted in the first releases of court papers. She was distraught at the subsequent naming of her in multiple intrusive and upsetting articles being published in the British media and online.

Having then become aware of the right to seek redaction she instructed this firm to represent her and we made such application to Judge Loretta Preska which was granted. We signed a Non-Party Notice and Order and were able to obtain the relevant documents to have our client's name redacted.

Alarming, despite this, our client was still named in papers which were later released in tranches because, frankly, the redaction exercise was clearly undertaken inadequately/ and or in a sloppy fashion resulting in publications in the media (in print and online) which have caused our client, a victim, considerable upset and distress. We have successfully threatened the British media with contempt proceedings which have resulted in the removal of many publications identifying our client – but put bluntly, our client should not need to be instructing lawyers to do that – and would not have needed to do so had the redaction process been conducted properly.

If the court requires a list of examples of the inadequate redactions and resulting media, please let us know and we can provide that information which we did not want to overload the court with today.

To avoid further distressing intrusion into our client's private life, we wish to ensure her anonymity in the upcoming trial, including proper redaction in any papers released or previously released identifying any information which includes our client's identity.

Please can you provide us with the following assurances:

1. that any documents from the previous defamation claim that are used in these upcoming criminal proceedings are equally covered by a court order on redaction protection for the victims and that this will be overseen with sufficient authority.
2. That any further and/or new documents and/or information that identifies our client be it the current or any previous proceedings are the subject of a strict requirement that the parties fully and comprehensively redact our client's name, and any version of it (given mistaken spellings eg. [REDACTED] or [REDACTED] etc....)

Additionally, can you inform us of any further procedures and/or applications we must follow or make in order to make any further redactions on behalf of our client should her name appear in any of the new documents?

Yours sincerely,

Mark Manley

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