



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 12, 2021

BY ELECTRONIC MAIL

Christian Everdell, Esq.
Mark Cohen, Esq.
Cohen & Gresser LLP

Laura Menninger, Esq.
Jeffrey Pagliuca, Esq.
Haddon, Morgan and Foreman, P.C.

Bobbi Sternheim, Esq.
Law Offices of Bobbi C. Sternheim

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

Dear Counsel:

Today we are producing the materials listed in the below index. These discovery materials are stamped with control numbers SDNY_GM_02742963 through SDNY_GM_02743100. Please note that these are the materials that the Court directed the Government to disclose by today's date in an Order dated November 18, 2020 (Dkt. No. 73).

Please note that both this letter and the enclosed materials are governed by the July 31, 2020 Protective Order in this case.¹ **This letter is itself designated as "confidential," because it includes information regarding records designated as "confidential" under the Protective Order.** An index of the materials contained in this production is below:

¹ Files in PDF format designated as "confidential" under the protective order have been stamped "confidential." However, certain files cannot be individually labeled as confidential on the documents themselves due to their file format.

Bates Start	Bates End	Summary Description	Confidential Designation
SDNY GM 02742936	SDNY GM 02743100	Photographs and documents regarding victims not referenced in Indictment No. S1 20 Cr. 330	Confidential

The Government recognizes that its discovery obligations are ongoing and will promptly produce any additional discoverable material of which it becomes aware. Please do not hesitate to reach out if you have any difficulty accessing these materials.

Very truly yours,

AUDREY STRAUSS
United States Attorney

by:

[REDACTED]

[REDACTED]

[REDACTED]

Assistant United States Attorneys

[REDACTED]