

From: BOBBI C STERNHEIM <[REDACTED]>

To: [REDACTED]

Cc: Christian Everdell <[REDACTED]> Laura Menninger
<[REDACTED]> Jeff Pagliuca <[REDACTED]>

Subject: US v. Maxwell -Trial Start Date

Date: Mon, 10 May 2021 21:33:55 +0000

Good afternoon-

Following up on the status of our conferral emails as our joint letter (re: trial start date) is due today.

Thanks-

Bobbi

BOBBI C. STERNHEIM, ESQ.
Law Offices of Bobbi C. Sternheim

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On May 9, 2021, at 12:14 PM, BOBBI C STERNHEIM <[REDACTED]> wrote:

Good afternoon-

In our 4/22 letter, we provided specific details concerning cases and trial dates to justify our request for a continuance to 11/8.

Beyond a vague statement regarding consideration of availability of witnesses and counsel, you have provided no specific details why the government cannot proceed to trial on 11/8.

EFTA00102211

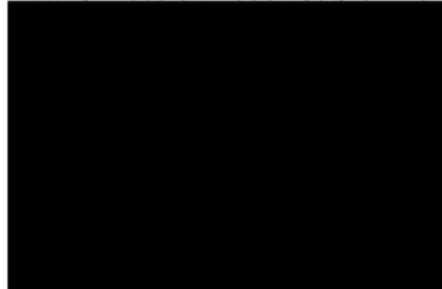
Starting the trial on 11/29 - besides disrupting Thanksgiving holiday plans - will push the trial to the end of the year and possibly into the new year, interfering with Christmas and New Year's plans, as COVID did last year. This will cast the defense and defense case in a negative light as jurors impatiently wait for the trial to conclude before Christmas, which it won't. Our previous email explained our reasons for firmly pressing the 11/8 trial date, but as an accommodation, we would consider starting on 11/15, but no later.

For now, we will not agree to exclusion of speedy trial time beyond 11/8. These scheduling conflicts can be easily eliminated by consenting to bail for Ms. Maxwell.

It is unclear why the scheduling order, which contemplated a continuance, should be altered. As previously discussed and raised with the Court, we need to review of 3500 material and exhibits before determining the need to call any experts.

Enjoy the day.
Bobbi

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On May 7, 2021, at 9:30 PM, [REDACTED] wrote:

Bobbi,

Thanks very much for letting us know your availability. Regarding the trial date, after considering the availability of witnesses and counsel, we plan to propose a trial date of November 29, 2021. Could you please let us know your position regarding that date, so that we can include it in our letter to the Court? In addition, please let us know whether you consent to an exclusion of time under the Speedy Trial Act between now and the new trial date the Court selects.

With respect to other scheduling matters, we intend to propose that the Court set a deadline of three months before trial for the Government to disclose the identities of victims referenced in the indictment; this is an earlier proposal than the timeframe we had originally proposed for the July trial date. We also intend to propose that the deadline for defense expert disclosures be set for two months before trial, given the substantial length of the adjournment. Please let us know your position regarding those proposed dates and we'll include it in our letter.

Thanks very much, and hope everyone has a nice weekend--

From: BOBBI C STERNHEIM [REDACTED]
Sent: Friday, May 7, 2021 5:26 PM

[REDACTED]
[REDACTED] Christian Everdell <[REDACTED]> Laura
Menninger [REDACTED]; Jeff Pagliuca <[REDACTED]>
Subject: Re: United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)

[REDACTED]
We are available to begin November 8th and to conclude by the end of the year.
Laura has a civil trial scheduled for December 13th, but will try to move it.
Bobbi

BOBBI C. STERNHEIM, ESQ.
Law Offices of Bobbi C. Sternheim

[REDACTED]

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On May 7, 2021, at 5:16 PM, [REDACTED] wrote:

Bobbi,

We understand that you're requesting a November 8th date, and that you prefer that date. Separate from your preferences, our question was simply about your scheduling availability in light of the Court's order. Can you please let us know your availability and we will note that accordingly in our submission to the Court?

[REDACTED]

From: BOBBI C STERNHEIM <[REDACTED]>
Sent: Friday, May 7, 2021 4:00 PM

[REDACTED]

Cc: Christian Everdell <[REDACTED]> Laura Menninger <[REDACTED]>; Jeff Pagliuca <[REDACTED]>
Subject: Re: United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)

Good afternoon-
For the reasons stated in our letter-motion of 4/22 (Dkt. 246), our earliest and preferred date in the fall is 11/8. In light of Ms. Maxwell's extended period of detention and its deleterious effect on her health and well-being, we cannot agree to a date far beyond 11/8. However, should you agree to her release pending trial, we would have greater date flexibility. Enjoy the weekend.
Bobbi

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On May 7, 2021, at 1:13 PM, [REDACTED] wrote:

Hi Bobbi,

Thanks for your response. Your April 22, 2021 letter does not address the defense's availability for trial dates after November 8th, and it would be helpful to get a complete picture of available dates throughout the balance of 2021 in order to provide the Court with comprehensive information. We're still in the process of conferring with witnesses regarding their availability, so we're gathering a variety of data points. Please let us know your availability and we can put together a proposal.

Thanks,

[REDACTED]

From: BOBBI C STERNHEIM <[REDACTED]>
Sent: Thursday, May 6, 2021 11:58 PM

Cc: Christian Everdell <[REDACTED]>; Laura Menninger <[REDACTED]>; Jeff Pagliuca <[REDACTED]>

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

Good evening-

Our 4/22 letter detailed our position. Please let us know your availability for 11/8.

Thank you-

Bobbi

BOBBI C. STERNHEIM, ESQ.
Law Offices of Bobbi C. Sternheim

[REDACTED]

[REDACTED]

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EFTA00102215

On May 6, 2021, at 7:15 PM, [REDACTED] wrote:

Counsel,

We write to confer in accordance with the Court's Order about a trial date in this case. Please let us know your preferences and availability for trial dates from September 2021 through the end of the year. If you could please provide details for any conflicts, that would be helpful.

Thank you,

[REDACTED]

[REDACTED]

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

[REDACTED]