

From: "[REDACTED] (USANYS)" <[REDACTED]>

To: "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>

Subject: FW: U.S. v. Maxwell, Case No. 20 Cr. 330 (AJN) [Joint Letter re. Redactions to Omnibus Resp. & Ex. 11]

Date: Sat, 17 Apr 2021 17:17:38 +0000

Attachments: 2021.04.01_Joint_Letter_re_redactions_in_Govt_Response.pdf;
2021.03.09_LAM_Letter_to_Nathan_re_redactions_in_Govt_Response.pdf

Inline-Images: image001.jpg

Team,

Judge Nathan also ordered the parties to docket the April 1 joint letter yesterday at the same time she ordered us to file the brief and exhibits by 3 pm. If we think this letter needs redactions, we have to propose redactions by April 19. I don't think the joint letter needs redactions but please let me know if you disagree. I would draw your attention to page 5 of the joint letter, in which Menninger wrote:

Indeed, this Court rejected Ms. Maxwell's argument that certain portions of the Response and its exhibits should be unredacted because the material had already been made public. See Dkt. No. 168 at 2-3; Letter Motion of Laura A. Menninger dated March 9, 2021 (Objection to Proposed Redactions of Government's Omnibus Response & Exhibit 5) at 2-3 ([REDACTED] memoir detailing her private family matters released by Second Circuit in *The Billionaire Playboys Club* manuscript). The government also persists in using pseudonyms in this case such as "Minor Victim 2" in place of an accuser who has told her story most publicly on Netflix, ABC News, and the New York Times.

I'm attaching the March 9 letter, which we agreed did not need any redactions (though I'm not sure it has been publicly filed).

Please let me know what you think. If you agree that no redactions are needed, I'll email them to let them know.

Thanks,

[REDACTED]

From: Nicole Simmons <[REDACTED]>

Sent: Thursday, April 1, 2021 7:29 PM

To: 'Nathan NYSD Chambers' <[REDACTED]>

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

[REDACTED]; [REDACTED] <[REDACTED]>; [REDACTED];

[REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>

Subject: U.S. v. Maxwell, Case No. 20 Cr. 330 (AJN) [Joint Letter re. Redactions to Omnibus Resp. & Ex. 11]

Dear Judge Nathan,

At the request of Laura Menninger please see attached the Joint Letter submission Pursuant to this Court's Order of March 29, 2021 (Dkt. No. 189).

Regards,

Nicole



Nicole Simmons
Haddon, Morgan and
Foreman, P.C.
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80203

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