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UNITED STATES OF AMERICA,

- v. -

GHISLAINE MAXWELL,

Defendant.

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AFFIDAVIT OF CERTIFICATION
PURSUANT TO LOCAL
CRIMINAL RULE 16.1

20 Cr. 330 (AJN)

STATE OF NEW YORK)
COUNTY OF NEW YORK : ss.
SOUTHERN DISTRICT OF NEW YORK)

[REDACTED], pursuant to Title 28, United States Code, Section 1746, hereby affirms under penalty of perjury:

1. I am an Assistant United States Attorney in the Office of Audrey Strauss, Acting United States Attorney for the Southern District of New York. I am one of the Assistants who represents the Government in these proceedings.

2. I certify pursuant to Local Criminal Rule 16.1 that the Government has conferred in good faith with counsel to the defendant, Ghislaine Maxwell, regarding the Government's request to delay disclosure of certain materials to the defense, pursuant to Federal Rule of Criminal Procedure 16, and that the parties have been unable to reach agreement.

3. In particular, the Government has asked defense counsel whether they will consent to delayed disclosure of certain materials related to victims who were abused by Jeffrey Epstein outside the period charged in the Indictment in this case (the “Materials”). Defense counsel has indicated that they will not consent to delayed disclosure of the Materials and that they intend to

file an opposition to any motion by the Government seeking authorization to delay disclosure of the Materials.

4. I hereby certify that the foregoing statements made by me are true.

Dated: New York, New York
October 1, 2020



Assistant United States Attorney
Telephone: [REDACTED]