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December 10, 2021

BY EMAIL



United States Attorney's Office
Southern District of New York
1 St. Andrew's Plaza
New York, NY 10007

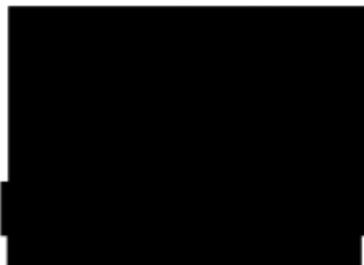
Re: *United States v. Ghislaine Maxwell*, S2 20 Cr. 330 (AJN)

Dear Counsel:

Pursuant to the Court's Order dated June 2, 2021 (Dkt. 297), we write to provide the government with the list of potential defense witnesses. Included on the list are three attorneys: Brad Edwards, Robert Glassman, and Jack Scarola. Pursuant to the Court's instruction, we will brief any privilege issues to the Court before offering their testimony. We would also like the opportunity to confer about stipulations concerning their testimony and the testimony of other witnesses. Finally, we reserve the right to add or substitute witnesses as we further define the defense case.



2. Richard Barnett



10. Dr. Park Dietz

[REDACTED]

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11. Ryan Dionne
12. [REDACTED]
13. Brad Edwards (attorney – subject to briefing prior to any testimony)
14. [REDACTED]
15. Joseph Finn
16. Robert Glassman (attorney – subject to briefing prior to any testimony)
17. [REDACTED]
18. Malcolm Grumbridge
19. Alexander Hamilton
20. [REDACTED]
21. [REDACTED]
22. Robert Kelso
23. [REDACTED]
24. Adam Perry Lang
25. Dr. Elizabeth Loftus
26. John Lopez
27. [REDACTED]
28. [REDACTED]
29. Florina Rueda
30. Jack Scarola (attorney – subject to briefing prior to any testimony)
31. Doug Schoettle
32. [REDACTED]
33. [REDACTED]
34. Igor Zinoviev
35. Shopper's Travel records custodian

In the email accompanying this letter, we have also provided a hyperlink to a Sharefile containing the defense disclosures under Rule 26.2.

Sincerely,

/s/ Christian R. Everdell
Christian R. Everdell
COHEN & GRESSER LLP

[REDACTED]

cc: All counsel of record (by email)