



Christian R. Everdell
[REDACTED]

December 10, 2021

BY EMAIL

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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.

1. [REDACTED]
2. [REDACTED]
3. [REDACTED]
4. [REDACTED]
5. [REDACTED]
6. [REDACTED]
7. [REDACTED]
8. Task Force Officer [REDACTED]
9. Lucy Mary Clive
10. Dr. Park Dietz

[REDACTED]
December 10, 2021

Page 2

11. [REDACTED]
12. [REDACTED]
13. Brad Edwards (attorney – subject to briefing prior to any testimony)
14. [REDACTED]
15. [REDACTED]
16. Robert Glassman (attorney – subject to briefing prior to any testimony)
17. [REDACTED]
18. [REDACTED]
19. Alexander Hamilton
20. Michelle Healy
21. Dominique Hyppolite
22. Robert Kelso
23. Elizabeth Nesbitt Kuyrkendall
24. [REDACTED]
25. Dr. Elizabeth Loftus
26. John Lopez
27. Special Agent [REDACTED]
28. Assistant United States Attorney [REDACTED]
29. [REDACTED]
30. Jack Scarola (attorney – subject to briefing prior to any testimony)
31. [REDACTED]
32. Special Agent [REDACTED]
33. Special Agent [REDACTED]
34. [REDACTED]
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
800 Third Avenue, 21st Floor
New York, New York 10022
[REDACTED]

cc: All counsel of record (by email)