

From: [REDACTED] >

To: BOBBI C STERNHEIM [REDACTED] >

Cc: Christian Everdell [REDACTED] >, "Mark S. Cohen" [REDACTED]

[REDACTED]

Subject: RE: Ghislaine Maxwell 02879-509

Date: Tue, 29 Dec 2020 17:49:42 +0000

Bobbi,

I just spoke with MDC legal counsel. Below are the responses to your concerns:

- MDC legal confirmed that since the beginning of the pandemic, MDC inmates in general population have been permitted out of their cells for no more than 3 hours per day. For approximately the past month, MDC inmates in general population have been permitted out of their cells for no more than 30 minutes per day due to a lockdown at the institution. When that lockdown is lifted, inmates will still be permitted out of their cells no more than 3 hours per day while the pandemic persists. Accordingly, Ms. Maxwell has far more hours out of her cell than any other inmate in the MDC at this time. The MDC will not further expand that time. As I previously noted, if general population inmates eventually end up receiving more than 13 hours per day out of their cells, I will ask that Ms. Maxwell receive the same amount of time.
- I have again asked MDC legal counsel if Ms. Maxwell may use the laptop on weekends. MDC legal counsel indicated they would pass that request up their chain and would circle back to me with a response.
- MDC legal counsel confirmed that no staff member has ever directed Ms. Maxwell to remain in a particular location within her isolation cell. They confirmed that staff understand that no such directions should be given.
- MDC legal counsel confirmed that Ms. Maxwell has continued to have access to the laptop 13 hours per day every weekday. That access has been documented, and MDC legal counsel is not aware of any restrictions on Ms. Maxwell's use of the laptop during those times.
- MDC legal counsel confirmed that staff absolutely cannot see Ms. Maxwell when she showers and do not record her when she showers. They indicated that Ms. Maxwell has two shower curtains that cover her when she showers such that only her feet are visible when she is in the shower.
- MDC legal counsel confirmed that staff have not observed any condensation on the walls of Ms. Maxwell's isolation cell. The most recent temperature reading from Ms. Maxwell's isolation cell, which was taken last night, indicated the cell was 72.8 degrees. Ms. Maxwell currently has three blankets in her cell and is the only inmate in the entire institution that is permitted to have a third blanket in her cell.
- MDC legal counsel indicated that Ms. Maxwell is patted down when she is moved, just like any other inmate. She is wanded once per week when she receives a body scan. MDC legal counsel confirmed that staff do not put their fingers inside of Ms. Maxwell's (or any other inmate's) mouth. MDC legal counsel is inquiring as to the frequency of searches during which Ms. Maxwell is required to lower her mask and open her mouth and will circle back to me with that information. They understand my request that those searches be kept to a minimum. MDC legal counsel (and I) have never heard of in-and-behind ear searches. Would you be able to explain what that term refers to, please?
- MDC legal counsel confirmed that Ms. Maxwell's cell is searched no more than once per day during weekdays only. They further confirmed that the searchers make reasonable efforts to replace any moved items where they were originally located (in other words, the searches do not include a "toss" of the cell). They also confirmed that staff do not read any of Ms. Maxwell's legal papers.
- MDC legal counsel indicated that the institution has been having some delays in mail delivery generally. They asked whether you can please provide the name of the sender of the certified mail you referenced so that they can attempt to locate that mail.

Best,

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

From: BOBBI C STERNHEIM
Sent: Tuesday, December 29, 2020 12:09 PM

To: [REDACTED]
Cc: Christian Everdell ; Mark S. Cohen ; [REDACTED]
Subject: Re: Ghislaine Maxwell 02879-509

Much appreciated.

Thank you-

BOBBI C. STERNHEIM, ESQ.
Law Offices of Bobbi C. Sternheim
[REDACTED]
[REDACTED]

Main: [REDACTED]
[REDACTED] 917-912-9698

Fax: [REDACTED]
[REDACTED]

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On Dec 29, 2020, at 11:02 AM, [REDACTED] > wrote:

Bobbi,

I hope you and your team are having a wonderful holiday season too, thanks.

I am reaching out to MDC legal counsel to discuss the issues you have raised in your email and will reach back out to you after that conversation.

Best,

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

From: BOBBI C STERNHEIM [REDACTED]
Sent: Monday, December 28, 2020 8:42 PM

To: [REDACTED]
Cc: Christian Everdell <[REDACTED]> ; Mark S. Cohen [REDACTED]
Subject: Ghislaine Maxwell 02879-509

Good evening, [REDACTED] -

We hope you and your family had a joyful holiday.

In response to your 12/14 email, we are requesting that Ms. Maxwell be permitted to use the laptop, in lieu of the MDC computer,, during the typical length of time other inmates are permitted out of their cells (our understanding is 6 am - 9:30 pm daily, extended to 10:30 pm on weekends.) The voluminous discovery is easier to access and review on the laptop. The MDC computer turns off every two hours and is not capable of opening all documents, and **volume of discovery may be too taxing for the operating system.**

We also want to bring to your attention some of the ongoing issues concerning Ms. Maxwell's conditions and restrictions.

The constant rotation of security staff results in inconsistency of rules and restrictions, the current shift being unnecessarily restrictive, punitive, and threatening.

Ms. Maxwell is ordered to remain in specific locations within her isolation cell to accommodate capture on the handheld camera, restricting her use of an already small confinement area.

Her use of the laptop has been restricted.

She is invasively surveilled while showering.

Her cell is cold and precipitation accumulates on the concrete block walls.

Over the holiday weekend, a third blanket, used by Ms. Maxwell to keep herself warm, was **removed leaving her cold; and she now has the onset of a cold.**

The blanket was returned the next day, after complaint was made by counsel.

The open-mouth, wanding, pat-down, and in-and-behind ear searches continue, with more frequently than other inmates are searched.

Her cell and legal papers are searched multiple times a day, a disruption to the organization of her legal work and an invasion into her privileged work product.

She has not received daily newspapers for almost 3 weeks, and has not received certified mail (return receipts indicating delivery to MDC on 12/17) and non-certified mail for more than a week.

We will keep you apprised of our concerns.

Your assistance is appreciated.

Best-

Bobbi

BOBBI C. STERNHEIM, ESQ.

Law Offices of Bobbi C. Sternheim

Main: [REDACTED]

Cell: [REDACTED]

Fax: [REDACTED]

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