

From: BOBBI C STERNHEIM <[REDACTED]>
To: "[REDACTED]" <[REDACTED]>
Cc: Christian Everdell <[REDACTED]>, "Mark S. Cohen"
<[REDACTED]>, "[REDACTED]" <[REDACTED]>, "[REDACTED] (USANYS)" <[REDACTED]>
Subject: Re: Ghislaine Maxwell 02879-509
Date: Tue, 29 Dec 2020 17:08:37 +0000

Much appreciated.
Thank you-

BOBBI C. STERNHEIM, ESQ.
Law Offices of Bobbi C. Sternheim
33 West 19th Street - 4th Floor
New York, NY 10011

Main: [REDACTED]
Cell: [REDACTED]
Fax: [REDACTED]
[REDACTED]

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On Dec 29, 2020, at 11:02 AM, [REDACTED] <[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]
Assistant United States Attorney
Southern District of New York
1 St. Andrew's Plaza
New York, NY 10007
[REDACTED]
[REDACTED]

From: BOBBI C STERNHEIM <[REDACTED]>

Sent: Monday, December 28, 2020 8:42 PM

To: [REDACTED] <[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.

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