

From: Christian Everdell <[REDACTED]>
To: "NathanNYSDChambers@nysd.uscourts.gov"
<[REDACTED]>
Cc: "[REDACTED]" <[REDACTED]>, "[REDACTED]"
<[REDACTED]>, "[REDACTED] (USANYS)"
<[REDACTED]>, "Mark S. Cohen" <[REDACTED]>, "BOBBI
C STERNHEIM" <[REDACTED]>, 'Jeff Pagliuca' <[REDACTED]>,
'Laura Menninger' <[REDACTED]>
Subject: RE: U.S. v. Ghislaine Maxwell, 20 Cr. 330 (AJN) -- Renewed Bail Motion Reply
Memorandum and Exhibits (to be Filed Under Seal)

Date: Wed, 23 Dec 2020 18:08:04 +0000

Attachments: Reply_Memorandum_re_Renewed_Bail_Application_Final.pdf;
Reply_Memorandum_re_Renewed_Bail_Application_Final_Redacted.pdf

Inline-Images: image001.jpg; image002.jpg; image004.jpg; image006.jpg

Dear Judge Nathan –

In preparing to file the reply brief pursuant to the Court's order (Dkt. 101), we noticed a typographical error in the reply memorandum. [REDACTED]

[REDACTED] We have spoken to the government and they have no objection to the defense making this revision (on pages 1 and 8) before filing the memorandum on the public docket. Accordingly, attached to this email are revised versions of the unredacted and redacted memorandum reflecting this change. We will file the revised redacted version on the docket today. We apologize for the error.

Regards,

Christian R Everdell

COHEN & GRESSER LLP

800 Third Avenue
New York, NY 10022

[REDACTED] | [view bio](#)
www.cohengresser.com

New York | Paris | Washington DC | London



CONFIDENTIALITY NOTICE: The information contained in this e-mail may be confidential and/or privileged. This e-mail is intended to be reviewed initially by only the individual named above. If the reader of this e-mail is not the intended recipient or a representative of the intended recipient, you are hereby notified that any review, dissemination or copying of this e-mail or the information contained herein is prohibited. If you have received this e-mail in error, please immediately notify the sender by telephone and permanently delete this e-mail. Thank you.

PRIVACY: A complete copy of our privacy policy can be viewed at: <https://www.cohengresser.com/privacy-policy>.

From: Christian Everdell
Sent: Friday, December 18, 2020 7:40 PM
To: 'NathanNYSDChambers@nysd.uscourts.gov'

EFTA00015975

Cc: [REDACTED]'; [REDACTED]'; [REDACTED] (USANYS'); Mark S. Cohen; 'BOBBI C STERNHEIM'; 'Jeff Pagliuca'; 'Laura Menninger'
Subject: U.S. v. Ghislaine Maxwell, 20 Cr. 330 (AJN) -- Renewed Bail Motion Reply Memorandum and Exhibits (to be Filed Under Seal)

Dear Judge Nathan –

Attached please find the following documents submitted to the Court and all counsel under seal pursuant to the Court's order (Dkt. 89):

1. Cover letter
2. Reply memorandum (unredacted)
3. Reply memorandum (redacted)
4. Accompanying exhibits A-B

Regards,

Christian R Everdell

COHEN & GRESSER LLP

800 Third Avenue
New York, NY 10022

[REDACTED] | [view bio](#)
www.cohengresser.com

New York | Paris | Washington DC | London



CONFIDENTIALITY NOTICE: The information contained in this e-mail may be confidential and/or privileged. This e-mail is intended to be reviewed initially by only the individual named above. If the reader of this e-mail is not the intended recipient or a representative of the intended recipient, you are hereby notified that any review, dissemination or copying of this e-mail or the information contained herein is prohibited. If you have received this e-mail in error, please immediately notify the sender by telephone and permanently delete this e-mail. Thank you.

PRIVACY: A complete copy of our privacy policy can be viewed at: <https://www.cohengresser.com/privacy-policy>.