

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

GHISLAINE MAXWELL,

Defendant.

**AFFIDAVIT OF CERTIFICATION**  
**PURSUANT TO LOCAL**  
**CRIMINAL RULE 16.1**

20 Cr. 330 (AJN)

I, Christian R. Everdell, an attorney duly admitted to practice in New York State and before this Court, declare the following is true and correct under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am a partner at Cohen & Gresser LLP, counsel for defendant Ghislaine Maxwell in the above-captioned case.
2. I certify pursuant to Local Criminal Rule 16.1 that defense counsel has conferred in good faith with Assistant U.S. Attorneys [REDACTED] [REDACTED], and [REDACTED] regarding the defense's request for the disclosure of the identities of Victims 1-3 referenced in the indictment, subject to the restrictions of the protective order entered by the Court. The government did not agree to the request, and instead indicated that it would disclose the identities of Victims 1-3 through its production of Rule 16 discovery, or as part of its production of Jencks Act material closer to trial.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

Dated: August 10, 2020  
New York, New York

/s/ Christian R. Everdell  
Christian R. Everdell  
COHEN & GRESSER LLP  
[REDACTED]  
New York, New York 10022  
Phone: [REDACTED]