

**From:** "██████████)" <██████████>  
**To:** "██████████)" <██████████>, "██████████)" <██████████>  
**Subject:** RE: piling on  
**Date:** Sat, 11 Jul 2020 02:38:21 +0000

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Thanks for looking.

**From:** ██████████) <██████████>  
**Sent:** Friday, July 10, 2020 7:33 PM  
**To:** ██████████) <██████████>; ██████████) <██████████>  
**Subject:** RE: piling on

I haven't been able to find anything in which Maxwell's attorneys claim they don't know where Maxwell is. That statement was only reported on (as best I can tell) in this article (<https://creativedestructionmedia.com/news/politics/2020/01/23/ghislaine-maxwells-lawyers-admit-they-dont-know-where-she-is-either/>), which refers to a letter filed with Judge Preska in January 2020, and dated December 2019. The article claims that the letter admitted Maxwell's lawyers don't know where their client is. Maxwell's attorneys filed one letter from that time period to Judge Preska that I've found. That letter does not include any suggestion that Maxwell's counsel does not know where Maxwell is. Rather, the letter cites to newspaper articles about the frenzied attempts of reporters to track Maxwell down. So seems that the article misrepresented the letter from Maxwell's attorneys.

In case it's helpful, though, I found a couple orders permitting alternative service because of plaintiffs' inability to serve Maxwell.

Here is a text order in ██████ case approving alternative service after Maxwell's counsel refused to accept service.

06/15/2020	45	ORDER granting <a href="#">43</a> Motion To Approve Alternate Service on Defendant Ghislaine Maxwell ("Maxwell"). Plaintiff's motion is unopposed, and, based on Plaintiff's representations regarding her unsuccessful efforts to locate Maxwell's current residence, her fruitless attempts to serve Maxwell at multiple locations, her equally fruitless attempts to contact Maxwell via several email addresses publicly associated with Maxwell, and her rejected request to Maxwell's known litigation counsel to accept service on Maxwell's behalf, this Court finds that Plaintiff has adequately demonstrated that she has made diligent efforts to effect service, and that personal service would be impracticable. See Ransome v. Epstein, No. 17cv616 (JGK), 2018 WL 637421, at *1 (S.D.N.Y. Jan. 30, 2018); see also Farmer v. Indyke, No. 19cv10475 (LGS)(DF) (Text Order, dated Feb. 12, 2020). This Court further finds that Plaintiff's provision of a copy of the Summons and Complaint by email to Maxwell's current counsel of record in the Farmer case (see Declaration of Robert S. Glassman, dated May 27, 2020 (Dkt. 43-2), Ex. 3) was reasonably calculated to place Maxwell on notice of this suit and to constitute sufficient service under the circumstances presented here. No later than 6/18/20, Plaintiff is directed to serve Maxwell with a copy of this Text Order by the same means (i.e., by email to Maxwell's counsel of record in the Farmer case), and to file proof of such service on the Docket of this action. Maxwell may then have until 7/9/20 to move, answer, or otherwise respond to the Complaint. (HEREBY ORDERED by Magistrate Judge Debra Freeman)(Text Only Order) (Freeman, Debra) (Entered: 06/15/2020)
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And here is a similar text order granting the same request in ██████ case after Maxwell's counsel refused to accept service.

06/15/2020	45	ORDER granting <a href="#">43</a> Motion To Approve Alternate Service on Defendant Ghislaine Maxwell ("Maxwell"). Plaintiff's motion is unopposed, and, based on Plaintiff's representations regarding her unsuccessful efforts to locate Maxwell's current residence, her fruitless attempts to serve Maxwell at multiple locations, her equally fruitless attempts to contact Maxwell via several email addresses publicly associated with Maxwell, and her rejected request to Maxwell's known litigation counsel to accept service on Maxwell's behalf, this Court finds that Plaintiff has adequately demonstrated that she has made diligent efforts to effect service, and that personal service would be impracticable. See Ransome v. Epstein, No. 17cv616 (JGK), 2018 WL 637421, at *1 (S.D.N.Y. Jan. 30, 2018); see also Farmer v. Indyke, No. 19cv10475 (LGS)(DF) (Text Order, dated Feb. 12, 2020). This Court further finds that Plaintiff's provision of a copy of the Summons and Complaint by email to Maxwell's current counsel of record in the Farmer case (see Declaration of Robert S. Glassman, dated May 27, 2020 (Dkt. 43-2), Ex. 3) was reasonably calculated to place Maxwell on notice of this suit and to constitute sufficient service under the circumstances presented here. No later than 6/18/20, Plaintiff is directed to serve Maxwell with a copy of this Text Order by the same means (i.e., by email to Maxwell's counsel of record in the Farmer case), and to file proof of such service on the Docket of this action. Maxwell may then have until 7/9/20 to move, answer, or otherwise respond to the Complaint. (HEREBY ORDERED by Magistrate Judge Debra Freeman)(Text Only Order) (Freeman, Debra) (Entered: 06/15/2020)
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**From:** [REDACTED] <[REDACTED]>

**Sent:** Friday, July 10, 2020 7:01 PM

**To:** [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>

**Subject:** piling on

Could you guys possibly locate the transcript or filing where GM's attorneys said they did not know where she was? I tried calling Sigrid but didn't reach her today. That would be a big help. Thanks team.

[REDACTED]  
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New York, NY 10007  
[REDACTED]