



HADDON
MORGAN
FOREMAN

Haddon, Morgan and Foreman, P.C.
Laura A. Menninger

150 East 10th Avenue
Denver, Colorado 80203
PH 303.831.7364 FX 303.832.2628
www.hmflaw.com
LMenninger@hmflaw.com

March 8, 2021

VIA EMAIL



United States Attorney's Office
Southern District of New York
1 St. Andrew's Plaza
New York, NY 10007

Re: *United States v. Ghislaine Maxwell*, 20 Cr. 330 (AJN)
Request to view physical evidence, "highly confidential" materials and scenes

Dear Counsel:

I write to formally request an opportunity to (a) view, inspect, and document the physical evidence seized and held in connection with this case, (b) view and inspect all materials designated by your office as "Highly Confidential" under the terms of the Protective Order, and (c) visit, document and inspect any physical scene where you allege illegal conduct occurred, to include the Epstein properties for which you included photographs in the Superseding Indictment.

Counsel for Ms. Maxwell and our investigator(s) are available for purposes of reviewing the physical evidence and Highly Confidential materials on March 17-18, 2021. Given the volume of materials seized, we anticipate that the evidence view may take more than one eight (8) hour session to complete and we ask that you plan accordingly. We request that Ms. Maxwell be present and able to participate in that evidence view.

If you have a log of all evidence seized in connection with this case, we ask that you provide it to us in advance of the evidence-view so that we may bring the appropriate equipment to document the items as necessary.

With regard to the scene visits, we are open to discussing dates and times for those to occur over the next month. Please contact me with your proposal. We will need to make appropriate travel arrangements.

EFTA00021699

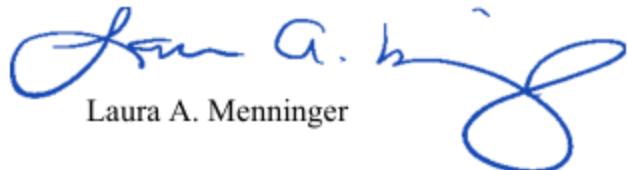
Ms. Comey, Moe and Pomerantz

March 6, 2021

Page 2

If you have any questions, please do not hesitate to contact me.

Respectfully submitted,



Laura A. Menninger

CC: Counsel of Record via Email

EFTA00021700