



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

October 28, 2021

BY ELECTRONIC MAIL

Christian Everdell, Esq.

Mark Cohen, Esq.

Cohen & Gresser LLP

800 Third Avenue

New York, NY 10022

Laura Menninger, Esq.

Jeffrey Pagliuca, Esq.

Haddon, Morgan and Foreman, P.C.

150 East Tenth Avenue

Denver, CO 80203

Bobbi Sternheim, Esq.

Law Offices of Bobbi C. Sternheim

33 West 19th Street-4th Fl.

New York, NY 10007

Re: *United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)*

Dear Counsel:

Today we are producing the materials listed in the below index. These materials are stamped with control numbers SDNY_GM_02765768 through SDNY_GM_02767073.

Please note that both this letter and the enclosed materials are governed by the July 31, 2020 Protective Order in this case. **This letter is itself designated as “confidential,” because it includes information regarding records designated as “confidential” under the Protective Order.** The Department of Justice directed this office to cease the dissemination of materials marked with the word “confidential” in order to avoid potential confusion with markings reserved for classified documents. Accordingly, in order to note the appropriate designation of this production under the operative Protective Order in this case, the materials being produced today are marked with the following label: “SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17.” This marking directly refers to the specific paragraphs of the Protective Order that govern today’s production.

An index of the materials contained in this production is below:

Bates Start	Bates End	Summary Description	Confidential Designation
SDNY_GM_02765768	SDNY_GM_02765768	Scanned page of contact book	Confidential
SDNY_GM_02765769	SDNY_GM_02766967	Materials from Estate of Jeffrey Epstein ¹	Confidential
SDNY_GM_02766968	SDNY_GM_02766974	Records from the United Kingdom	Confidential
SDNY_GM_02766975	SDNY_GM_02767068	Scan of 1 bound black address book marked Government Exhibit 52, as referred to in SDNY_GM_02753612	Confidential
SDNY_GM_02767069	SDNY_GM_02767073	Scan of 2 stapled handwritten set of documents on yellow legal pad paper, as referred to in SDNY_GM_02753612	Confidential

The Government recognizes that its discovery obligations are ongoing and will promptly produce any additional discoverable material of which it becomes aware. Please do not hesitate to reach out if you have any difficulty accessing these materials.

Very truly yours,

DAMIAN WILLIAMS
United States Attorney

by: s/ _____

[REDACTED]
[REDACTED]
[REDACTED]

Assistant United States Attorneys

¹ These materials appear to be largely duplicative of materials previously produced to you in discovery.