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October 25, 2021

BY ECF

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *United States v. Ghislaine Maxwell*, S2 20 Cr. 330 (AJN)

Dear Judge Nathan:

We respectfully submit this letter to request a one-week extension until November 3, 2021, to file the joint proposed jury charge and verdict sheet, which are currently due on October 27, 2021. *See* 8/27/2021 Order (Dkt. 330). The government consents to this request.

On October 20, 2021, the government provided the defense with its proposed jury charge. Because of the press of other deadlines in this case—including the motions *in limine* responses and replies, and the Rule 412 briefing—the defense requests an additional week to provide its counterproposals to the government and to submit the final proposed jury charge to the Court.

The government and the defense have met and conferred and agreed that the defense will send the government a redlined version of the government's proposed jury charge containing the defense's counterproposals by November 1, 2021. The parties will submit the final joint proposed request to charge and verdict sheet, with the areas of continued disagreement shown in redline, on November 3, 2021. We respectfully request that the Court approve this revised schedule.

Sincerely,

/s/ Christian Everdell
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cc: All Counsel of Record (By ECF)