

**From:** [REDACTED]

[REDACTED]

[REDACTED]

**Cc:** [REDACTED]

[REDACTED]

[REDACTED] >

**Subject:** US v. Maxwell, 20 Cr. 330 (AJN) - non-testifying witness production

**Date:** Fri, 23 Jul 2021 21:31:51 +0000

**Attachments:** 2021.07.23\_Maxwell\_Cover\_Letter\_Final.pdf;  
2021.07.23\_U.S.\_v\_Ghislaine\_Maxwell\_Non-  
Testifying\_Witness\_Material\_Index\_(Defense\_Copy).pdf

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Counsel,

A supplemental production of non-testifying witness material is now ready to produce. Attached please find the cover letter and index accompanying this production. Because the production contains audio and video files, it is too large to produce via USAfx. Would you please provide our office with two drives (128 GB should be more than sufficient) for us to load with one copy for you and one copy to be sent to Ms. Maxwell at the MDC?

One thing to note: as indicated in the cover letter, DOJ has recently directed our office to cease production of materials marked with the word "confidential" in order to avoid confusion with markings reserved for classified documents. Accordingly, we have noted the appropriate designation for this production by using the label, "SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17," which references the relevant paragraphs in the Protective Order governing confidential materials. Please let us know if you have any objection to this marking or would like to discuss.

Thank you,

[REDACTED]

[REDACTED]  
Assistant United States Attorney  
Southern District of New York  
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New York, NY 10007  
[REDACTED]  
[REDACTED]