



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

November 23, 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\_02775032 through SDNY\_GM\_02775072.

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:

<b>Bates Start</b>	<b>Bates End</b>	<b>Summary Description</b>	<b>Confidential Designation</b>
SDNY GM 02775032	SDNY GM 02775065	JPMC records	Confidential
SDNY GM 02775066	SDNY GM 02775069	Phone records	Confidential
SDNY GM 02775070	SDNY GM 02775072	Other records	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/ \_\_\_\_\_  
  
  
  
  
Assistant United States Attorneys