



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 27, 2021

REQUEST TO BE FILED UNDER SEAL
BY EMAIL

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

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

Dear Judge Nathan:

The Government respectfully submits this letter in response to the Court's directive at the November 23, 2021 final pretrial conference that the Government provide its anticipated order of witnesses for the upcoming trial in the above-referenced matter.¹ Consistent with the Court's instruction, below is the order of witnesses that the Government currently expects to call during the first two to three days of trial:

1. [REDACTED]
2. [REDACTED] (testifying under the pseudonym "Jane")
3. [REDACTED] (testifying under the pseudonym "[REDACTED]")
4. [REDACTED]
5. [REDACTED]

The Government has also attempted to approximate the order in which its remaining witnesses will testify at trial. The Government notes, however, that this order may change,

¹ The Government respectfully requests that this letter be filed under seal. Because this letter does not seek any relief or require any ruling by the Court, it is arguably not a judicial document subject to the common law presumption of access. Moreover, this letter contains the identities of witnesses, including witnesses whom the Court has authorized to testify using pseudonyms or their first names.

depending on, among other factors, the pace of trial. Many of the below-listed witnesses will be traveling from out of state, and many witnesses have personal and/or professional obligations around which the Government is attempting to schedule. Accordingly, it is possible that the Government may call some of these witnesses in a different order than that indicated below. Additionally, the Government reserves the right to call additional witnesses should unexpected developments arise during trial.

With those understandings, the Government currently expects to call its remaining witnesses in the following order:

6. [REDACTED]
7. [REDACTED]
8. [REDACTED]
9. [REDACTED]
10. [REDACTED]
11. [REDACTED] under the pseudonym "[REDACTED]"
12. [REDACTED]
13. [REDACTED]
14. [REDACTED]
15. [REDACTED] other (testifying under the pseudonym "[REDACTED]"²)
16. [REDACTED]
17. [REDACTED] fying only under his first name, "[REDACTED]"
18. [REDACTED]
19. [REDACTED]
20. [REDACTED] ifying only under her first name, "[REDACTED]"
21. [REDACTED]
22. [REDACTED] tifying only under her first name, "[REDACTED]"
23. [REDACTED] r
24. [REDACTED]
25. [REDACTED]
26. [REDACTED]
27. [REDACTED] ifying under her full name, "[REDACTED]"
28. [REDACTED]
29. [REDACTED]
30. [REDACTED]

² The Government previously indicated that this witness would testify under the pseudonym "John." Because defense counsel expressed concerns about confusion that could arise from that name, the Government has changed this pseudonym to "[REDACTED]."

31 [REDACTED]

Finally, the Government notes that it may elect not to call some of the above-listed witnesses as trial progresses. The Government will promptly inform the Court and defense counsel if it determines that any witness will not be called in the Government's case-in-chief.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: s/

[REDACTED]

Assistant United States Attorneys
Southern District of New York

Cc: Defense Counsel (by email)