

From: BOBBI C STERNHEIM [REDACTED]

To: [REDACTED]

Cc: Christian Everdell [REDACTED], "Mark S. Cohen"

Subject: Ghislaine Maxwell 02879-509

Date: Tue, 29 Dec 2020 01:41:41 +0000

Good evening, [REDACTED]

We hope you and your family had a joyful holiday.

In response to your 12/14 email, we are requesting that Ms. Maxwell be permitted to use the laptop, in lieu of the MDC computer,, during the typical length of time other inmates are permitted out of their cells (our understanding is 6 am - 9:30 pm daily, extended to 10:30 pm on weekends.)

The voluminous discovery is easier to access and review on the laptop. The MDC computer turns off every two hours and is not capable of opening all documents, and volume of discovery may be too taxing for the operating system.

We also want to bring to your attention some of the ongoing issues concerning Ms. Maxwell's conditions and restrictions.

The constant rotation of security staff results in inconsistency of rules and restrictions, the current shift being unnecessarily restrictive, punitive, and threatening.

Ms. Maxwell is ordered to remain in specific locations within her isolation cell to accommodate capture on the handheld camera, restricting her use of an already small confinement area.

Her use of the laptop has been restricted.

She is invasively surveilled while showering.

Her cell is cold and precipitation accumulates on the concrete block walls.

Over the holiday weekend, a third blanket, used by Ms. Maxwell to keep herself warm, was removed leaving her cold; and she now has the onset of a cold.

The blanket was returned the next day, after complaint was made by counsel.

The open-mouth, wand, pat-down, and in-and-behind ear searches continue, with more frequently than other inmates are searched.

Her cell and legal papers are searched multiple times a day, a disruption to the organization of her legal work and an invasion into her privileged work product.

She has not received daily newspapers for almost 3 weeks, and has not received certified mail (return receipts indicating delivery to MDC on 12/17) and non-certified mail for more than a week.

We will keep you apprised of our concerns.


Your assistance is appreciated.

Best-

Bobbi

BOBBI C. STERNHEIM, ESQ.

Law Offices of Bobbi C. Sternheim
[REDACTED]
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Please use email or fax, instead of regular mail, for all correspondence during this time.

We continue to work regular business hours throughout this situation.

Thank you for your consideration. Our best wishes for your good health and well being.

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