



U.S. Department of Justice

United States Attorney
Southern District of New York



April 12, 2021

BY ELECTRONIC MAIL

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

Dear Counsel:

Today we are producing certain materials relating to individuals the Government does not currently intend to call as witnesses at trial in the above-referenced case. Attached please find an index detailing the materials included in today's production. Please note that both the index and the enclosed materials are governed by the July 31, 2020 Protective Order in this case. **The index is itself designated as "confidential," because it includes information regarding records designated as "confidential" under the Protective Order.** Please note that many of these individuals are represented by counsel, as detailed in the attached index. The Government reserves its right to amend and supplement these disclosures.

This production should not be taken to indicate that the Government believes it has any obligation to provide all of these materials; rather, we make this production as a courtesy. Moreover, although the Government presently does not intend to call the individuals listed in the

enclosed index, we reserve the right to do so and will notify you should the Government determine that it intends to call any of these individuals at trial.

Very truly yours,

[REDACTED]

United States Attorney

by: s/

[REDACTED]

Assistant United States Attorneys

[REDACTED]