



Christian R. Everdell
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May 28, 2021

VIA ECF

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

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

Dear Judge Nathan:

On behalf of our client, Ghislaine Maxwell, we will be filing our Omnibus Reply Memorandum in Support of Ms. Maxwell's Supplemental Pretrial Motions Relating to the S2 Superseding Indictment.

The reply memorandum contains Confidential Information produced in discovery that is governed by paragraph 15 of the Protective Order (Dkt. 36). Accordingly, pursuant to our prior practice, we will not file the reply memorandum on the public docket until we are instructed to do so by the Court. Instead, we will submit the reply memorandum by email to the Court and the government under seal—pursuant to Rule 2(B) of the Court's individual rules of criminal practice—to give the government the opportunity to propose and justify any redactions it deems necessary.

Please contact us with any questions. Your consideration is greatly appreciated.

Respectfully submitted,

/s/ Christian R. Everdell
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cc: All counsel of record (via email)