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

July 27, 2020

VIA ECF

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 to request the opportunity to respond to defense counsel's letter motion seeking the entry of a protective order, which was filed this morning. The Government and defense counsel were in discussions – as recently as 6 p.m. last night – in the hopes of jointly proposing a protective order. Until seeing the filing on ECF this morning, the Government had understood those discussions to be ongoing. In light of the defense's letter, however, the Government respectfully requests until 5 p.m. tomorrow to submit a response.

Respectfully submitted,

AUDREY STRAUSS
Acting United States Attorney

By: /s
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Cc: All counsel of record (by ECF)