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**VIA EMAIL**

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

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

Dear Judge Nathan,

On behalf of our client, Ghislaine Maxwell, we respectfully submit this letter in response to the government's letter, dated November 27, 2021, seeking to preclude certain topics of cross-examination.<sup>1</sup> The defense does not intend to cross-examine Accuser-1 or Accuser-2 about [REDACTED] [REDACTED] unless their testimony opens the door to such cross-examination. Similarly, the defense does not intend to cross-examine Accuser-1 about [REDACTED] [REDACTED] unless the witness's testimony opens the door to such cross-examination.

However, Accuser-1's brother, who is a testifying witness, told the government less than three weeks ago that [REDACTED]

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<sup>1</sup> Pursuant to our established protocol, the defense is submitting this letter to the Court under temporary seal to allow the government to propose any appropriate redactions.

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[REDACTED]

[REDACTED] The defense  
should be permitted to cross-examine Accuser-1 about [REDACTED] because it is relevant  
to her ability to recall the events in question accurately. As the government concedes, it is

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Respectfully submitted,



Jeffrey S. Pagliuca

CC: Counsel of Record