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December 12, 2021

Honorable Alison J. Nathan
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *United States v. Ghislaine Maxwell*
S2 20 Cr. 330 (AJN)

Dear Judge Nathan:

I write to inform the Court that the defense has provided the government with the tentative order of the first several defense witnesses. We have informed the government that we are still trying to make travel arrangements for defense witnesses, many of whom are coming from locations out of the district and abroad, and we have not been able to reach counsel for some of the witnesses over the weekend. We further informed the government that the order of witnesses is subject to change, and we will advise the government if we think the order will change as travel plans solidify. We also informed the government that three of the defense witnesses have requested to testify under their first names or under a pseudonym. The government opposes this request. The Court's ruling on this issue may impact the willingness of these witnesses to testify, thereby compromising Ms. Maxwell's right to present her defense, and may affect the witness order.

Very truly yours,

/s/

BOBBI C. STERNHEIM

cc: All counsel of record