Case 1:20-cr-00330-AJN Document 661 Filed 05/11/22 Page 1 of 2

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #:______ DATE FILED:____5/11/22

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

May 11, 2022

By ECF

The Honorable Alison J. Nathan, Sitting by Designation 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, S2 20 Cr. 330 (AJN)

Dear Judge Nathan:

SO ORDERED.

The Government respectfully moves for the exclusion of time for Counts Seven and Eight

under the Speedy Trial Act, 18 U.S.C. § 3161(c)(1), until June 28, 2022—the scheduled date of

sentencing. Although the Government currently intends to move to dismiss these counts at sentencing, as it has previously stated (*see* Dkt. No. 574), the Government seeks this exclusion of time in an abundance of caution, so the Act does not preclude prosecution in the unlikely event an intervening development occurs between now and sentencing which causes the Government to reconsider that position. Such an exclusion promotes the ends of justice by obviating any need for

the parties and the Court to prepare for a second trial which, barring unforeseen developments,

1

will not occur. See 18 U.S.C. § 3161(h)(7)(A). Defense counsel consents to this exclusion.

SO ORDERED.

U.S. Circuit Judge Sitting by designation 5/11/22



Respectfully submitted,

DAMIAN WILLIAMS United States Attorney

By: <u>s/</u> Maurene Comey Alison Moe Lara Pomerantz Andrew Rohrbach Assistant United States Attorneys Southern District of New York

Cc: Defense Counsel (by ECF)