



**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*

November 22, 2021

**BY 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:

Pursuant to the Court's Orders at Dkt. Nos. 473, 474, and 476, the parties are docketing today the Government's motion to quash the defendant's Rule 17(c) subpoena, proposed redacted versions of the Government's letter motion of November 18, 2021 and the defendant's response, and proposed redacted versions of the defendant's response relating to Government Exhibit 52 and the Government's reply.

The defense has informed the Government that they are not seeking redactions to these filings.

The Government's proposed redactions are consistent with the three-part test articulated by the Second Circuit in *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110 (2d Cir. 2006). Although the parties' supplemental briefing and the Court's Opinion & Order are judicial documents subject to the common law presumption of access, the limited proposed redactions are narrowly tailored to protect the privacy interests of the Minor Victims and witnesses, including individuals who have not identified themselves on the record in this case, and who are subjects of the Court's pseudonym order.

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Respectfully submitted,

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