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December 4, 2020

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

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

Dear Judge Nathan:

Per the Court's order (Dkt. 81), the parties have conferred regarding the briefing schedule for Ghislaine Maxwell's renewed motion for release on bail. The defense respectfully requests that the hearing take place before the holidays and the government is amenable to that schedule. Accordingly, the parties propose the following briefing schedule:

Defense submission:	December 7, 2020
Government response:	December 16, 2020
Defense reply due:	December 18, 2020
Hearing:	December 21, 2020 (subject to the Court's availability)

Per the Court's order, the defense will send our submissions to the Court under seal on the dates mentioned above and will include a proposed redacted version of the submission to be filed on the docket for the Court's consideration. We ask that the Court order the government to follow the same procedure for its submission.

Also, although the Court's Individual Practices in Criminal Cases do not contain a page limit for motions, we are mindful of the Court's 25-page limit for civil motions. In light of the numerous topics the defense must cover in connection with the renewed bail application, the defense respectfully requests leave to file a motion not to exceed 40 pages. The defense does not object to the government receiving a similar enlargement of pages to respond.

Your consideration is greatly appreciated.

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Respectfully submitted,

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cc: All counsel of record (via email)