

District Judge
Hon. Paul A. Engelmayer
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007
BY EMAIL: **PROSE@nysd.uscourts.gov**

Courtroom: 1305

Re: Case No. 1:20-cr-00330-PAE; US v GHISLAINE MAXWELL

Dear Honorable Englemayer:

I have noted this Court's admonition regarding the identification of any complainant witnesses protected pursuant to the protective order in place during trial.

Please note that in my filing letter to the Clerk of this Court I specifically requested the assistance of the Court and the temporary SEALING of the documents until they could be reviewed because as a result of being in custody for more than 5 years I have no knowledge of sealing and unsealing decisions by now multiple Courts and other government entities. Further, there is only one witness complainant who has not identified herself publicly and there is no mention of her in my petition. (Exhibit 115 should be sealed or redacted.) However, I understand this Court's Order specifying that the protective order at Trial shall govern any identification in all future filings.

I note this Court's deadlines but I am immediately concerned. Please note as I am in Federal Custody I have no access to the internet and in the absence of a court order no access to a computer. I am very familiar with the problems associated with review of one million documents from a hard drive provided by the DOJ. Each page must populate completely before review and sometimes takes up to 10 minutes per page, Just a quick calculation assuming 1 page per minute indicates more than 600 days assuming a 24 hour workday would be required to review this newly disclosed material, The DOJ has assigned 85 trained attorneys to conduct this review.. Nonetheless I will make my best effort to comply and meet this Courts deadline as set in your recent Order. I have not yet received a copy of the Order by US Post and have no printer but have heard its contents reported in the press.

From news reports I have learned that there is extensive material that was never disclosed to PETITIONER. In affidavits filed in Radar Online v FBI it was stated that "The Petitioner did not have access to all of the FBI files relating to the investigation and prosecution of Epstein" Radar Online LLC v. Federal Bureau Of Investigation (1:17-cv-03956) District Court, S.D. New York (Docket 47 7/11/23 at page 5).

Respectfully , I request that this Court Order (1) that I be provided access to a computer and (2) that a copy of all of these newly disclosed documents be produced to me soonest, unredacted, on a hard drive by the DOJ and (3) that a hard drive of trial discovery 1:20-cr-00330- AJN be made available to me so that I may accurately address this Court on the issues raised in this Petition.

I am in custody at FPC Bryan in Bryan Texas.

Ghislaine Maxwell 02879-509
FPC Bryan
FPC Bryan, P.O. Box 2149, Bryan, TX 77805

Respectfully,

Ghislaine Maxwell 02879-509