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January 5, 2021

BY EMAIL

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

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

Dear Judge Nathan:

We write concerning an issue of pressing importance. It has come to the attention of the defense that one of the twelve jurors in this case (the “Juror”) has been giving oral and videotaped interviews to various members of the press concerning the jury deliberations. These interviews have been publicly reported in several media outlets.¹ Among other things, the Juror told reporters that he disclosed to the other members of the jury during deliberations that he was a victim of sexual abuse and further described his memory of those events. According to the Juror, his disclosure influenced the deliberations and convinced other members of the jury to convict Ms. Maxwell.

[REDACTED]

[REDACTED]

¹ See Lucia Osborne-Crowley, “‘They were all believable’: Maxwell juror says jury was convinced by accusers’ accounts of a pattern of abuse,” *The Independent* (Jan. 4, 2022); Laura Collins and Daniel Bates, “‘Ghislaine was a predator as guilty as Epstein’: Maxwell juror describes moment he ‘locked eyes’ with sex trafficker and reveals his own abuse ordeal,” *Daily Mail* (Jan. 5, 2022), available at <https://www.dailymail.co.uk/news/article-10370193/Ghislaine-Maxwell-juror-says-evidence-convinced-panel-predator.html>; Luc Cohen, “Some Ghislaine Maxwell jurors initially doubted accusers, juror says,” *Reuters* (Jan. 5, 2022).

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[REDACTED]

[REDACTED] presents incontrovertible grounds for a new trial under Rule 33. [REDACTED]

[REDACTED]

[REDACTED] Should the defense prevail on this motion—and we believe the law and facts are clearly on our side—it would render all other post-trial motions moot. Ms. Maxwell should not have to expend precious time and resources briefing other motions when this motion can and should be dispositive. Accordingly, the defense respectfully requests that the Court set a briefing schedule for this motion alone and defer setting a briefing schedule for any other post-trial motions.

Sincerely,

/s/ Christian Everdell
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cc: All Counsel of Record (By Email)