

From: [REDACTED] >

To: BOBBI C STERNHEIM [REDACTED] >

Cc: [REDACTED]

Subject: RE: Ghislaine Maxwell 02879-509

Date: Mon, 16 Nov 2020 18:06:58 +0000

Bobbi,

Thank you for including me on this email. I understand from my conversation with MDC legal counsel today that MDC staff is continuing to monitor temperatures throughout the facility, including in the area where Ms. Maxwell is housed. My understanding is that the temperature where Ms. Maxwell is housed remains within the limits prescribed by BOP policy and that the MDC does not expect this week's activities to affect the temperature in Ms. Maxwell's cell. That said, they will continue to monitor the temperature and take appropriate action if it falls below prescribed limits.

As has previously been conveyed via letter from the Government to defense counsel dated October 8, 2020, the MDC's assessment continues to be that Ms. Maxwell's current cell is the most appropriate placement for Ms. Maxwell both for her safety and the security of the institution.

Finally, you have referenced a court order directing that certain steps be taken by the BOP. The only order of which I am aware is Judge Nathan's order dated August 25, 2020, which denied Ms. Maxwell's request for an order concerning the conditions of confinement at the MDC (*See* Dkt. No. 49 at 2-3). Please let me know if there is a different order to which you are referring.

Best,

[REDACTED]
[REDACTED]
Assistant United States Attorney
Southern District of New York
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: BOBBI C STERNHEIM

Sent: Monday, November 16, 2020 9:50 AM

To: [REDACTED]; [REDACTED]

Cc: [REDACTED]

Subject: Ghislaine Maxwell 02879-509

Good afternoon-

I am informed that the NYC Dept. of Design & Construction will shut off water and heat to the MDC from 9:00 pm to 5:00 am beginning tonight until 11/21.

I am further informed that the MDC will give inmates one bottle of water and an extra blanket due to this disruption of services.

I am requesting that my client - Ghislaine Maxwell (02879-509)

be moved from her present isolation cell with two exterior walls to an interior cell.

Please explain why she cannot be moved to the cell in the dayroom area where, by Court order, she is permitted to review discovery from 7:00 am to 8:00 pm.

Thank you-

Bobbi C. Sternheim

BOBBI C. STERNHEIM, ESQ.

Law Offices of Bobbi C. Sternheim
[REDACTED]
[REDACTED]

EFTA00009920

Main: [REDACTED]
Cell: [REDACTED]
Fax: [REDACTED]
[REDACTED]

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On Nov 10, 2020, at 1:45 PM, [REDACTED] > wrote:

The City contacted us and they said the water and heat will not be shut off. The information has been posted on the inmate Bulletin.

>>> BOBBI C STERNHEIM [REDACTED] 11/9/2020 3:47 PM >>>

Good afternoon-

I am informed that the NYC Dept. of Design & Construction will shut off water and heat to the MDC from 8:30 pm to 4:00 am beginning tonight until 11/17.

I am further informed that the MDC will give inmates a bottle of water and an extra blanket due to this disruption of services.

I am requesting that my client - Ghislaine Maxwell (02879-509) be moved from her present isolation cell with two exterior walls to an interior cell.

Please explain why she cannot be moved to the cell in the dayroom area where, by Court order, she is permitted to review discovery from 7:00 am to 8:00 pm.

Thank you-

Bobbi C. Sternheim

BOBBI C. STERNHEIM, ESQ.

Law Offices of Bobbi C. Sternheim

[REDACTED]
[REDACTED]

Main: [REDACTED]
Cell: [REDACTED]
Fax: [REDACTED]
[REDACTED]

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