

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----	X	
UNITED STATES OF AMERICA,	:	
	:	
v.	:	20 Cr. 330 (AJN)
	:	
GHISLAINE MAXWELL,	:	NOTICE OF MOTION
	:	
Defendant.	:	ORAL ARGUMENT REQUESTED
	:	
-----	X	

**DEFENDANT GHISLAINE MAXWELL’S NOTICE OF MOTION UNDER THE
FOURTH AMENDMENT, *MARTINDELL*, AND THE FIFTH AMENDMENT TO
SUPPRESS ALL EVIDENCE OBTAINED FROM THE GOVERNMENT’S SUBPOENA
TO ██████████ AND TO DISMISS COUNTS FIVE AND SIX
(Pretrial Motion # 11)**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, Defendant Ghislaine Maxwell, through counsel, hereby moves to suppress under the Fourth Amendment, *Martindell*, and the Fifth Amendment all evidence obtained from the government’s subpoena to ██████████ and to dismiss Counts Five and Six.

Dated: January 25, 2021
New York, New York

Respectfully submitted,

s/ Jeffrey S. Pagliuca

Jeffrey S. Pagliuca
Laura A. Menninger
HADDON, MORGAN & FOREMAN P.C.
150 East 10th Avenue
Denver, CO 80203
Phone: 303-831-7364

Mark S. Cohen
Christian R. Everdell
COHEN & GRESSER LLP
800 Third Avenue
New York, NY 10022
Phone: 212-957-7600

Bobbi C. Sternheim
Law Offices of Bobbi C. Sternheim
33 West 19th Street - 4th Floor
New York, NY 10011
Phone: 212-243-1100

Attorneys for Ghislaine Maxwell