

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

JAN - 7 2002

UNITED STATES OF AMERICA  
  
vs.  
  
ZACARIAS MOUSSAOUI,  
  
Defendant.  
  
COURTROOM TELEVISION  
NETWORK LLC,  
  
Movant-Intervenor.

Criminal No. 1:01cr455

**MOTION FOR LEAVE TO APPEAR AS AMICI CURIAE IN SUPPORT OF  
COURTROOM TELEVISION NETWORK'S MOTION FOR LEAVE  
TO RECORD AND TELECAST PRETRIAL AND TRIAL PROCEEDINGS**

The Radio-Television News Directors Association ("RTNDA"), Cable News Network LP, LLLP ("CNN"), and The Reporters Committee for Freedom of the Press hereby move the Court for leave to appear as *amici curiae* and to file the accompanying proposed Memorandum Of Amici Curiae Radio-Television News Directors Association, Cable News Network LP, LLLP, And The Reporters Committee For Freedom Of The Press In Support Of Courtroom Television Network's Motion For Leave To Record And Telecast Pretrial And Trial Proceedings. RTNDA is a professional association devoted to electronic journalism. Its more than 3000 members include local and network news executives, educators, students, and others in the radio, television, cable and other electronic media worldwide. CNN is an AOL Time Warner company. CNN is the world's largest news organization with over a dozen television and radio news networks and websites, as well as several news programming services, provided

domestically and worldwide. CNN employs more than 4,000 news professionals, who gather news throughout the world. The Reporters Committee for Freedom of the Press is a voluntary, unincorporated association of reporters and editors that works to defend the First Amendment rights and freedom of information interests of the news media. The Reporters Committee has provided representation, guidance and research in First Amendment and Freedom of Information Act litigation since 1970.

Proposed *amici* seek to fulfill “the classic role of *amicus curiae* by assisting a case of general public interest, supplementing the efforts of counsel, and drawing the court’s attention to law that escaped consideration.” *Miller-Wohl Co., Inc. v. Comm’r of Labor and Indus.*, 694 F.2d 203, 204 (9th Cir. 1982). Moreover, permitting participation by *amici* will “focus the court’s attention on the broader implication of various possible rulings.” Robert L. Stern, *et al.*, Supreme Court Practice § 13.13, at 562 (7th ed. 1993). Because the interest of proposed *amici* is not limited to the particular proceedings at issue in this case, proposed *amici* may present the Court with a broader legal perspective than to the parties. Moreover, proposed *amici*’s participation in this case is particularly appropriate, because any decision of the Court will directly impact *amici*, due to their direct interest in news coverage of this trial.

### CONCLUSION

For the foregoing reasons, *amici* respectfully request that the Court grant this motion and accept the attached Memorandum of Amici Curiae Radio-Television News Directors Association, Cable News Network, LLLP, and The Reporters Committee For Freedom Of The Press In Support Of Courtroom Television Network’s Motion For Leave To Record And Telecast Pretrial And Trial Proceedings.

Dated: January 7, 2002

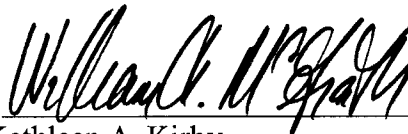
Respectfully submitted,

WILEY REIN & FIELDING LLP

OF COUNSEL

Jonathan Donellan, Esq.  
Assistant General Counsel  
Cable News Network LP, LLLP  
One CNN Center  
Atlanta, GA 30303

Lucy Dalglish, Esq.  
Executive Director  
Reporters Committee for Freedom of the Press  
1815 N. Ft. Myer Dr., Suite 900  
Arlington, VA 22209

By:  \_\_\_\_\_

Kathleen A. Kirby  
William McGrath, Va. Bar No. 33093  
Eve J. Klindera

1776 K Street NW  
Washington, D.C. 20006  
(202) 719-3360  
Facsimile (202) 719-7049

ATTORNEYS FOR AMICI CURAIE

**CERTIFICATE OF SERVICE**

I hereby certify that, on this 7th day of January 2001, I served true and correct copies of the foregoing Motion For Leave to Appear as Amici Curiae in Support of Courtroom Television Network's Motion for Leave to Record and Telecast Pretrial and Trial Proceedings by hand-delivery or courier for next-business-day delivery, as indicated below, upon counsel for the parties as follows:

**By Hand Delivery**

Frank W. Dunham, Jr.  
Office of the Federal Public Defender  
401 Courthouse Square  
Alexandria, Virginia 22314

Robert A. Spencer  
United States Attorney's Office  
2100 Jamieson Avenue  
Alexandria, Virginia 22314-5794

Lee Levine  
Jay Ward Brown  
Cameron Stracher  
Levine Sullivan & Koch, LLP  
1050 17<sup>th</sup> Street, N.W.  
Suite 800  
Washington, DC 20036

**By Federal Express**

Edward B. MacMahon  
107 East Washington Street  
Middleburg, Virginia 20118

Gerald Thomas Zerkin  
Office of the Public Defender  
One Capital Square, Suite 1100  
830 East Main Street  
Richmond, Virginia 23219

  
Kathleen A. Kirby

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**ORDER**

UPON CONSIDERATION of the Motion for Leave to Appear as Amici Curiae in Support of Courtroom Television Network's Motion for Leave to Record and Telecast Pretrial and Trial Proceedings,

It Is Hereby ORDERED that the Motion is GRANTED.

ENTERED this \_\_\_\_ day of \_\_\_\_\_, 2002.

\_\_\_\_\_  
Judge Leonie M. Brinkema  
United States District Judge