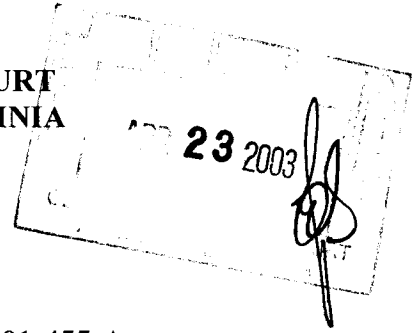


IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION



UNITED STATES OF AMERICA

vs.

ZACARIAS MOUSSAOUI,

Defendant.

ABC, INC., ASSOCIATED PRESS, THE  
HEARST CORPORATION, THE NEW  
YORK TIMES COMPANY, THE  
REPORTERS COMMITTEE FOR  
FREEDOM OF THE PRESS, TRIBUNE  
COMPANY AND THE WASHINGTON  
POST,

Movants-Intervenors.

Criminal No. 01-455-A

**UNOPPOSED MOTION OF MOVANT-INTERVENORS  
FOR AN EXTENSION OF TIME TO FILE A REPLY**

Come now Movants-Intervenors ABC, Inc., Associated Press, The Hearst Corporation, The New York Times Company, The Reporters Committee for Freedom of the Press, Tribune Company and The Washington Post (together, the "Media Intervenors") and respectfully request a one-week extension, through May 1, 2003, of the time in which Media Intervenors have to reply to the Response of the United States to Intervenors' Motion for Access to Certain Portions of the Record, Docket No. 848.

The Response of the United States was filed and served April 21, 2003, following a one-week extension of time granted to the government. The Media Intervenors' reply is currently due April 24, 2003. Media Intervenors respectfully request a one-week extension in order to fully consider the ramifications of the position taken by the United

States in its Response, including its recommendation that certain documents be unsealed, as well as the substantial new factual information made available to Media Intervenors for the first time in the government's Response. In this regard, lead counsel for the Media Intervenors requires additional time to confer with the seven intervenors concerning the content of a reply.

Counsel for Media Intervenors has conferred with counsel for the United States and with stand-by counsel for defendant, who do not object to this request.<sup>1</sup>

Dated: April 13, 2003

Respectfully submitted,

LEVINE SULLIVAN & KOCH, L.L.P.

By: 

Jay Ward Brown, Va. Bar No. 34355

*Lead Counsel*

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ATTORNEYS FOR MOVANTS-INTERVENORS

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<sup>1</sup> Media Intervenors are not able to ascertain the position of the defendant *pro se*.