

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES,

v.

DZHOKHAR A. TSARNAEV,

Defendant.

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CRIMINAL ACTION
NO. 1:13-cr-10200-GAO

**MOTION OF AMERICAN BROADCASTING COMPANIES, INC.; CBS NEWS, A
DIVISION OF CBS BROADCASTING INC.; CABLE NEWS NETWORK, INC.; AND
AND NBCUNIVERSAL MEDIA, LLC TO INSPECT AND COPY TRIAL EXHIBITS**

Movants American Broadcasting Companies, Inc., CBS News, a division of CBS Broadcasting Inc., Cable News Network, Inc., and NBCUniversal Media, LLC, hereby move for leave to inspect and copy trial exhibits entered into evidence at the close of each trial day.

Because of the importance of this information to ongoing news coverage of the trial of this case, movants respectfully request an expedited ruling on their motion. *See generally Nebraska Press Ass’n v. Stuart*, 427 U.S. 539, 561 (1976) (“As a practical matter ... the element of time is not unimportant if press coverage is to fulfill its traditional function of bringing news to the public promptly.”); *Globe Newspaper Co. v. Pokaski*, 868 F.2d 497, 507 (1st Cir. 1989) (“even a one to two day delay impermissibly burdens the First Amendment”). As further grounds for their motion, movants rely on their memorandum of law filed herewith.

LOCAL RULE 7.1 AND LOCAL RULE 112.1 REQUEST FOR HEARING

Movants recognize that the trial of this case is ongoing and imposes significant demands on the court and counsel. Counsel for the movants is available at any time, in person or by telephone, to be heard on this motion should the court conclude a hearing would be helpful to its decision.

Respectfully submitted,

**AMERICAN BROADCASTING COMPANIES,
INC.; CBS NEWS, A DIVISION OF CBS
BROADCASTING INC.; AND CABLE NEWS
NETWORK, INC.; and NBCUNIVERSAL MEDIA,
LLC**

By their attorneys,

/s/Jonathan M. Albano

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Dated: March 6, 2015

CERTIFICATE OF SERVICE

I, Jonathan M. Albano, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on March 6, 2015.

/s/Jonathan M. Albano

Jonathan M. Albano