

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

2024 SEP 13 A 11: 28

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, JR.,

Defendant.

Criminal Action No. 1:18-cr-83

Oral Argument Requested

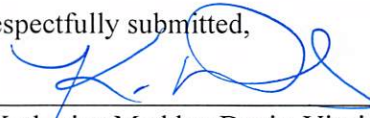
**MOTION OF THE REPORTERS COMMITTEE FOR FREEDOM OF
THE PRESS AND THE WASHINGTON POST TO INTERVENE
AND UNSEAL A JUDICIAL RECORD**

The Reporters Committee for Freedom of the Press (the “Reporters Committee”) and WP Company, LLC, d/b/a The Washington Post (the “Post”), by and through their counsel, respectfully move this Court for an order (1) permitting them to intervene in this matter for the limited purpose of challenging the sealing orders entered by the Court, *see* Fed. R. Civ. P. 24, and (2) unsealing Rod J. Rosenstein’s scope and authority memorandum dated August 2, 2017. In support of this Motion, the Reporters Committee and the Post assert their rights of access under the common law and the First Amendment to the United States Constitution to these documents and records.

This Motion is supported by the Memorandum of Law filed concurrently herewith, and any argument of counsel the Court shall wish to entertain.

September 13, 2024

Respectfully submitted,



Katie Townsend (*pro hac vice* forthcoming)
THE REPORTERS COMMITTEE FOR
FREEDOM OF THE PRESS
1156 15th St. NW, Suite 1020
Washington, DC 20005
Phone: 202.795.9300
Facsimile: 202.795.9310
ktownsend@rcfp.org

Katherine Maddox Davis, Virginia Bar No. 89104
GIBSON, DUNN & CRUTCHER LLP
1700 M Street, NW
Washington, DC 20036-4504
Phone: 202.955.8587
Facsimile: 202.831.6038
KDavis@gibsondunn.com

Theodore J. Boutrous Jr. (*pro hac vice* forthcoming)
GIBSON, DUNN & CRUTCHER LLP
333 South Grand Avenue
Los Angeles, CA 90071-3197
Phone: 213.229.7000
Facsimile: 213.229.6804
TBoutrous@gibsondunn.com

Lee R. Crain (*pro hac vice* forthcoming)
H. Chase Weidner (*pro hac vice* forthcoming)
Megan R. Murphy (*pro hac vice* forthcoming)
GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue
New York, NY 10166-0193
Phone: 212.351.2454
Facsimile: 212.817.9454
LCrain@gibsondunn.com
CWeidner@gibsondunn.com
MMurphy2@gibsondunn.com

*Counsel for Movants The Reporters Committee for
Freedom of the Press and The Washington Post*