IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

In re:

Application of The Reporters Committee for Freedom of the Press and The Washington Post for an Order Further Unsealing the Orders, Briefs, Transcripts, Docket, Record, and Party Names in In re Grand Jury Subpoena No. 7409.

Case: 1:24-mc-00115

Assigned To: Boasberg, James E.

Assign. Date: 9/13/2024

Description: Misc. Case (O–DECK)

Miscellaneous Action No.

Oral Argument Requested

APPLICATION OF THE REPORTERS COMMITTEE FOR FREEDOM OF THE PRESS AND THE WASHINGTON POST FOR AN ORDER FURTHER UNSEALING THE ORDERS, BRIEFS, TRANSCRIPTS, DOCKET, RECORD, AND PARTY NAMES IN IN RE GRAND JURY SUBPOENA NO. 7409

The Reporters Committee for Freedom of the Press ("Reporters Committee") is a nonprofit organization dedicated to defending the First Amendment and the newsgathering rights of journalists. WP Company, LLC, d/b/a The Washington Post (the "Post") is a news organization based in Washington, D.C. that, like the Reporters Committee, has a longstanding interest in advocating for government transparency, including for the rights of the press and public to access court records and proceedings. The Reporters Committee for Freedom of the Press and the Post, by and through their counsel, respectfully move this Court pursuant to Local Criminal Rule 57.6 for an order directing the further unsealing of documents filed in the civil contempt proceeding captioned *In re Grand Jury Subpoena No. 7409*, No. 18-gj-0041-BAH (D.D.C.). At a minimum, the Court, in conjunction with the government and the contemnor's counsel, Alston & Bird LLP, should remove redactions concealing (1) the name of the contemnor, (2) any material that was redacted to protect the identity of the contemnor corporation and its country of origin, and (3) any material redacted to conceal the existence and nature of the investigation.

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For the reasons set forth above, and as explained more fully in the accompanying Memorandum of Points and Authorities In Support of Application of the Reporters Committee for Freedom of the Press and The Washington Post for an Order Further Unsealing the Orders, Briefs, Transcripts, Docket, Record, and Party names In *In re Grand Jury Subpoena No.* 7409, the Reporters Committee for Freedom of the Press and the Post request that this Court grant this Application.

September 12, 2024

Bruce D. Brown (D.D.C. Bar No. 457317) Katie Townsend (D.D.C. Bar No. 1026115) 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

bbrown@rcfp.org ktownsend@rcfp.org Respectfully submitted,

Theodore J. Boutrous Jr. (D.D.C. Bar No. 420440)

Counsel of Record

GIBSON, DUNN & CRUTCHER LLP

1st thinky Both

333 South Grand Avenue

Los Angeles, CA 90071-3197

Phone: 213.229.7000 Facsimile: 213.229.7520 TBoutrous@gibsondunn.com

Lee R. Crain (D.D.C. Bar No. NY0337) 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: 212.351.4035
LCrain@gibsondunn.com
CWeidner@gibsondunn.com
MMurphy2@gibsondunn.com

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