

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

JAN - 8 2002

UNITED STATES OF AMERICA

vs.

ZACARIAS MOUSSAOUI,

Defendant.

COURTROOM TELEVISION
NETWORK LLC,

Movant-Intervenor.

Criminal No. 1:01cr455

**MEMORANDUM OF AMICI CURIAE AMERICAN BROADCASTING COS., INC.,
NATIONAL BROADCASTING COMPANY, INC., AND CBS BROADCASTING, INC.
IN SUPPORT OF COURTROOM TELEVISION NETWORK'S MOTION FOR LEAVE
TO RECORD AND TELECAST
PRETRIAL AND TRIAL PROCEEDINGS**

Amici curiae American Broadcasting Cos., Inc. ("ABC"), National Broadcasting Company, Inc. ("NBC") and CBS Broadcasting, Inc. ("CBS") respectfully submit this memorandum in support of Courtroom Television Network LLC's ("Court TV") motion to record and telecast pretrial and trial proceedings in this matter. The 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 is hereby adopted and incorporated by reference. As stated therein, to the extent that Rule 53 of the Federal Rules of Criminal Procedure and Local Rule 83.3 of the United States District Court for the Eastern District of Virginia prohibit audio-visual coverage of this case, the rules violate the United States

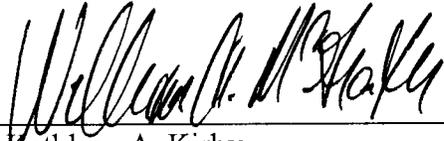
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Constitution. Accordingly, *amici curiae* ABC, NBC and CBS respectfully request that this Court enter an order granting Court TV's request to record and telecast the pre-trial and trial proceedings in this case.

Dated: January 8, 2002

Respectfully submitted,

WILEY REIN & FIELDING LLP

By: 

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CERTIFICATE OF SERVICE

I hereby certify that, on this 8th day of January 2002, I served true and correct copies of the foregoing Memorandum of Amici Curiae American Broadcasting Cos., Inc., National Broadcasting Company, Inc. and CBS Broadcasting, Inc. in Support of Courtroom Television Network's Motion for Leave to Record and Telecast Pretrial and Trial Proceedings hand-delivery or first class U.S. Mail, postage pre-paid, as indicated below, upon counsel for the parties as follows:

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