

FILED

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

2018 AUG 17 A 11:37

CLERK US DISTRICT COURT
ALEXANDRIA, VIRGINIA

UNITED STATES OF AMERICA,

vs.

PAUL J. MANAFORT, JR.,

Defendant.

Criminal Action No.: 1:18-cr-83

**CBS BROADCASTING INC. MOTION TO INTERVENE
AND JOIN MOTION FOR ACCESS TO CERTAIN PORTIONS OF THE RECORD**

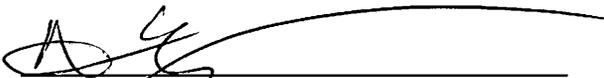
By and through undersigned counsel, CBS Broadcasting Inc. (“CBS”) respectfully moves this Court for leave to intervene in this matter for the limited purpose of joining prospective intervenors Cable News Network, Inc. (“CNN”); The Associated Press (“AP”); BuzzFeed, Inc. (“BuzzFeed”); NBCUniversal Media, LLC (“NBC”); The New York Times Company (“The Times”); POLITICO LLC (“Politico”); and WP Co., LLC, d/b/a/ The Washington Post (the “Post”) (collectively, the “Media Coalition”) in the Media Coalition Motion to Intervene and For Access to Certain Portions of the Record (the “Media Coalition Motion”). CBS wishes to join the Media Coalition because it shares the other Coalition members’ interests in obtaining access to the public information sought in the Media Coalition Motion. None of the other members of the Media Coalition objects to CBS’s intervention and joining the Media Coalition Motion.

WHEREFORE, CBS Broadcasting Inc. respectfully requests that the Court enter an order granting it leave to intervene and join the Media Coalition Motion to Intervene and For Access to Certain Portions of the Record as a member of the Media Coalition.

Respectfully submitted,

Dated: August 17, 2018

BALLARD SPAHR LLP

By: 

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Associated Press; BuzzFeed, Inc.; CBS
Broadcasting Inc.; NBCUniversal Media,
LLC; The New York Times Company;
POLITICO LLC; and WP Co., LLC, d/b/a/ The
Washington Post*

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of August, 2018, I caused true and correct copies of the foregoing Motion to Intervene and Join Motion For Access to Certain Portions of the Record, along with true and correct copies of the Memorandum in support thereof, the proposed order, and the Corporate Disclosure Statements, to be served via electronic mail and U.S. Mail on the following counsel of record:

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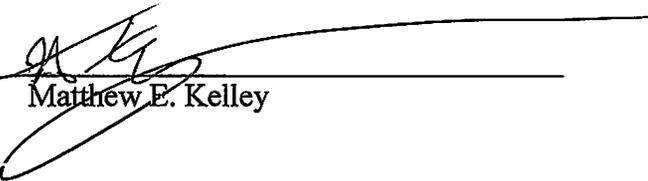
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Attorneys for Defendant Paul J. Manafort, Jr.

By: 
Matthew E. Kelley

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**NOTICE OF CBS BROADCASTING INC. MOTION TO INTERVENE
AND JOIN MOTION FOR ACCESS TO CERTAIN PORTIONS OF THE RECORD**

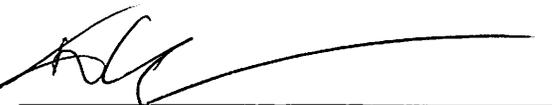
By and through undersigned counsel, CBS Broadcasting Inc. ("CBS") hereby provides notice of its filing on this date of its Motion to Intervene and Join Motion for Access to Certain Portions of the Record.

The Media Coalition has requested an expedited hearing on its Motion on Friday, August 17, 2018, or at the Court's earliest convenience. CBS respectfully requests that its Motion be heard contemporaneously with the original Media Coalition Motion. Should the Court not approve an expedited hearing, CBS intends to present this Motion at the next regularly scheduled motions hearing on Friday, August 24, 2018.

Respectfully submitted,

Dated: August 17, 2018

BALLARD SPAHR LLP

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Associated Press; BuzzFeed, Inc.; CBS
Broadcasting Inc.; NBCUniversal Media,
LLC; The New York Times Co.; POLITICO,
LLC; and WP Co., LLC, d/b/a/ The
Washington Post*

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of August, 2018, I caused true and correct copies of the foregoing Notice of CBS Broadcasting Inc. Motion to Intervene and Join Motion For Access to Certain Portions of the Record to be served via electronic mail and U.S. Mail on the following counsel of record:

Andrew A. Weissmann
Adam C. Jed
Brandon Lang Van Grack
Greg D. Andres
Michael R. Dreeben
Scott Andrew Meisler
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CORPORATE DISCLOSURE STATEMENT

Pursuant to Federal Rule of Criminal Procedure 12.4 and Local Criminal Rule 12.4, undersigned counsel hereby certify that:

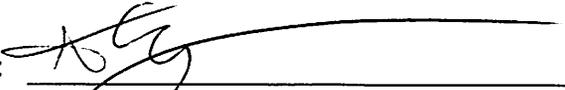
1. CBS Broadcasting Inc. is a wholly owned subsidiary of CBS Corporation, a publicly traded company. National Amusements, Inc., a privately held company, beneficially owns the majority of the Class A voting stock of CBS Corporation. CBS Corporation is not aware of any other ownership of the Class A voting stock of CBS Corporation in the amount of ten percent or more.

These representations are made in order that judges of this Court may determine the need for recusal.

Respectfully submitted,

Dated: August 17, 2018

BALLARD SPAHR LLP

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