



Respondents, Maj. Albert G. Courie III, indicated that their clients had no objection to this filing.

Good cause exists for this Court to grant this motion for leave to file. The Center for Constitutional Rights (CCR) is a nonprofit public interest law firm also engaged in public education, outreach and advocacy. In this capacity, CCR represented a large number of prospective media intervenors in the issue of public access to briefs, transcripts, and judicial orders in the Court Martial proceedings against Bradley (now Chelsea) Manning. See *Center for Constitutional Rights v. United States*, 72 M.J. 126 (C.A.A.F. 20013); *Center for Constitutional Rights v. Lind*, 954 F. Supp. 2d 389 (D. Md. 2013).

In the wake of the 9/11 attacks, CCR also litigated challenges by aliens and media to the ad hoc government policy of closing certain deportation hearings to the press and public. See *Haddad v. Ashcroft*, 221 F. Supp. 2d 799 (E.D. Mich. 2002), consolidated with *Detroit Free Press v. Ashcroft*, 195 F. Supp. 2d 937 and 195 F. Supp. 2d 948 (E.D. Mich. 2002) (granting injunctive relief), *affirmed*, 303 F.3d 681 (6th Cir. 2002); *North Jersey Media Group v. Ashcroft*, 205 F. Supp.2d 288 (D.N.J. 2002) (granting nationwide injunctive relief), *stay granted*, 70 U.S.L.W. 3798 (U.S. June 28, 2002), *rev'd*, 308 F.3d 198 (3d Cir. 2002), *cert. denied*, 538 U.S. 1056 (2003).

