INDEX NO. 63921/2020

NYSCEF DOC. NO. 186 RECEIVED NYSCEF: 11/22/2021

SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF WESTCHESTER

PROJECT VERITAS,

Plaintiff,

v.

NEW YORK TIMES COMPANY, MAGGIE ASTOR, TIFFANY HSU, and JOHN DOES 1–5,

Defendants.

NOTICE OF MOTION FOR LEAVE TO FILE BRIEF OF AMICI CURIAE IN SUPPORT OF DEFENDANTS AND IN RESPONSE TO THE COURT'S ORDER TO SHOW CAUSE

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PLEASE TAKE NOTICE that upon the annexed affirmation of KATIE TOWNSEND, counsel of record for the Reporters Committee for Freedom of the Press, dated November 22, 2021, and the accompanying proposed brief of amici curiae, the undersigned will move this Court before the Honorable Charles D. Wood at the Supreme Court of the State of New York in and for the County of Westchester, located at 111 Dr. Martin Luther King Jr. Boulevard in White Plains, NY 10601, on November 23, 2021, or as soon thereafter as counsel may be heard on amici's motion for leave to file the proposed brief of amici curiae in support of Defendants and in response to the Court's Order to Show Cause.

Dated: Washington, D.C.

November 22, 2021

Respectfully submitted,

REPORTERS COMMITTEE FOR FREEDOM OF THE PRESS

By: /s/ Katie Townsend

Katie Townsend