

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF CHARLESTON )  
 )

IN THE COURT OF GENERAL SESSIONS  
NINTH JUDICIAL CIRCUIT

EX PARTE: EVENING POST INDUSTRIES, INC., )  
SOUTH CAROLINA PRESS ASSOCIATION, )  
SINCLAIR PROPERTIES, L.L.C., D/B/A WCIV-TV, )  
AND THE ASSOCIATED PRESS, )  
INTERVENORS, )  
 )  
ABC, INC., THE STATE MEDIA COMPANY D/B/A )  
THE STATE, )  
MOVANTS, )  
 )

FILED  
2015 AUG -5 PM 1:06  
JULIE J. ARMSTRONG  
CLERK OF COURT  
BY *[Signature]*

IN RE:

STATE OF SOUTH CAROLINA )  
 )  
VS. )  
 )  
DYLANN S. ROOF, )  
 )

DOCKET NOS. 2015-GS-10-4115-4124  
2015-GS-10-4186-4188

NOTICE AND MOTION TO INTERVENE

1. ABC, Inc. is a corporation organized and existing under the laws of the State of New York having its principal place of business in New York City where it broadcasts, among other programs, ABC World News Tonight.
2. The State Media Company is a corporation organized and existing under the laws of the state of South Carolina, doing business as The State, and having its principal place of business in Columbia.
5. Heretofore, on or about July 10, 2015, the court in which the above-referenced prosecution is pending issued an order styled, "SUA SPONTE ORDER IMPLEMENTING A TEMPORARY PROTECTION ORDER" by the terms of which public bodies were directed to withhold information from the public, and persons who are "involved in the investigation or potentially involved in the trial of this matter" were subjected to a prior restraint prohibiting extrajudicial

comment “until a hearing on the release of materials regarding this prosecution is held....” A copy of the order is attached hereto as Exhibit A and incorporated herein by reference.

6. At some point prior to July 16, 2015 hearing in this matter, the Court allowed Evening Post Industries, The South Carolina Press Association, Sinclair Properties, LLC d/b/a WCIV-TV, and The Associated Press (hereinafter “Media Intervenors”) to intervene for the limited purpose of challenging the July 10th Order.

7. The moving parties adopt the position and are represented by the same counsel of the Media Intervenors in this matter.

8. The moving parties ask the Court to determine they have a right to speak on a matter of great public interest, thereby placing themselves at risk of punishment, similar to the Media Intervenors.

Respectfully Submitted,

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Columbia, South Carolina

July 21, 2015

