IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

IN THE MATTER OF THE APPLICATION OF THE NEW YORK TIMES COMPANY FOR ACCESS TO CERTAIN SEALED COURT RECORDS

Misc. Action No. 1:08-mc-00576-RCL

ADDENDUM TO MOTION FOR PUBLIC ACCESS TO CERTAIN SEALED RECORDS

In light of the Court's September 24, 2008 Order unsealing additional search warrant materials relating to Dr. Bruce Ivins, The New York Times Company and Los Angeles Communications LLC (together, "Movants") hereby withdraw that part of their Motion for Public Access to Certain Sealed Records which sought to unseal search warrant materials relating to Dr. Bruce Ivins. Movants continue to request access to search warrant materials relating to Dr. Stephen Hatfill and Peck Chegne.

Dated: September 29, 2008

Respectfully submitted,

LEVINE SULLIVAN KOCH & SCHULZ, L.L.P.

By: /s/ Jeanette M. Bead

David A. Schulz, DC Bar No. 459197

Jeanette M. Bead, DC Bar No. 480539

1050 Seventeenth Street, NW Suite 800 Washington, DC 20036-5514 Phone (202) 508-1100 Fax (202) 861-9888

Of Counsel:

David E. McCraw The New York Times Company 620 Eighth Avenue 18th Floor New York, NY 10018

Karlene W. Goller Los Angeles Times Communications LLC 202 West First Street Third Floor Los Angeles, California 90012