

## Defendants

CIVIL ACTION

NO. 1:18-CV-02610-TJK

1. This Court “has broad discretion to permit . . . participat[ion] [of] amici curiae,” and amicus participation is appropriate where amici have “relevant expertise and a stated concern for the issues at stake in [the] case.” *Dist. of Columbia v. Potomac Elec. Power Co.*, 826 F. Supp. 2d 227, 237 (D.D.C. 2011). An amicus brief should “‘be allowed when . . . the amicus has unique information or perspective that can help the court beyond the help that the lawyers for the parties are able to provide.’” *Cobell v. Norton*, 246 F. Supp. 2d 59, 62 (D.D.C. 2003) (quoting *Ryan v. Commodity Futures Trading Comm’n*, 125 F.3d 1062, 1063 (7th Cir. 1997)).

2. OAN is a 24/7 national cable network with reporters and videographers covering the White House daily. One America News Network provides live coverage daily and its Chief White House Correspondent covers briefings on a regular basis.

3. OAN's *amicus curiae* brief is filed in support of Defendants and in opposition to Plaintiffs' Motions for Temporary Restraining Order and Preliminary Injunction.

4. The *amicus curiae* brief *sub judice* is intended to, *inter alia*, highlight the unreasonable and disruptive behavior of CNN's Chief White House Correspondent, Plaintiff ABILIO JAMES ACOSTA, and how his specific conduct hinders other reporters from gaining access to Administration leadership to ask questions. OAN, with staff reporting each day from the White House is uniquely qualified to provide this Court with information and insight based on its experience and mission in covering the White House.

4. OAN is filing now under this expedited time frame because the Court has announced that it intends to rule on the pending temporary restraining order motion in the immediate future.

Respectfully submitted this 15<sup>th</sup> day of November 2018.

s/ W. Bruce DelValle

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**Counsel for *Amicus Curiae* One America News  
Network.**

### **CERTIFICATE OF SERVICE**

I hereby certify that on November 15, 2018, I electronically filed the foregoing Motion for Leave to File *Amicus Curiae* Brief of **One America News Network** in Opposition to Plaintiffs' Motions for a Temporary Restraining Order and Preliminary Injunction in Case No: 18-CV-02610-TJK, with the Clerk of the U.S. District Court for the District of Columbia by using the CM/ECF system, which will serve all registered CM/ECF users.

/s/ W. Bruce DelValle

W. Bruce DelValle, Bar No: 1520906