

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

ARGHAVAN LOUHGHALAM and MAZDAK )  
 POURABDOLLAH TOOTKABONI, )  
 )  
 Petitioners )  
 )  
 v. )  
 )  
 DONALD J. TRUMP, PRESIDENT OF THE )  
 UNITED STATES, ET AL., )  
 )  
 Respondents. )

CIVIL ACTION  
NO. 17-10154-NMG

**MOTION OF BOSTON GLOBE MEDIA PARTNERS, LLC TO INTERVENE FOR THE LIMITED PURPOSE OF MOVING FOR AN ORDER PERMITTING REMOTE ACCESS TO ELECTRONIC COURT FILINGS PURSUANT TO FED. R. CIV. P. 5.2(c) OR TO PERMIT THE PUBLIC TO PRINT AND/OR COPY UNSEALED COURT RECORDS**

Boston Globe Media Partners LLC, publisher of The Boston Globe Newspaper (the “Globe”) respectfully moves to intervene in this action for the limited purpose of filing a motion for an order (1) allowing the public to remotely access on Pacer unsealed electronic court filings in this case pursuant to Fed. R. Civ. P. 5.2(c); or, in the alternative, (2) permitting the public to print and/or copy unsealed case file records made available in the courthouse. As grounds for its motion, the Globe relies on its memorandum of law and the Declaration of Milton Valencia, filed herewith. *See also In re Boston Herald, Inc.*, 321 F.3d 174, 177 (1st Cir. 2003) (noting intervention of media in criminal case for purpose of pursuing access request); *In re Globe Newspaper Co.*, 729 F.2d 47, 50 n.2 (1st Cir. 1984) (“Some courts have held that media representatives may challenge closure orders by appeal if they first intervene in the underlying action.”).

*Motion allowed. SPMBoston, USDJ 2/2/17*