

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**IN RE MEDIA APPLICATION FOR  
AUDIOVISUAL ACCESS TO TRIAL  
PROCEEDINGS IN UNITED STATES OF  
AMERICA v. DONALD J. TRUMP**

**Case No. 23-mc-99 (TSC)**

**IN RE APPLICATION OF NBC  
UNIVERSAL MEDIA, LLC TO PERMIT  
VIDEO AND AUDIO OF TRIAL  
PROCEEDINGS IN UNITED STATES v.  
DONALD TRUMP**

**Case No. 23-mc-107 (TSC)**

**UNITED STATES' OPPOSED MOTION FOR LEAVE TO FILE  
REPLY IN OPPOSITION TO DEFENDANT DONALD J. TRUMP'S  
RESPONSE TO APPLICATIONS TO BROADCAST THE  
CRIMINAL TRIAL OF UNITED STATES v. TRUMP**

On November 3, 2023, the United States filed an opposition to applications of a coalition of media organizations seeking to record and broadcast the criminal trial of Donald J. Trump (“the defendant”). ECF No. 16. In advance of that filing, the Government sought the defendant’s position on the applications, and his counsel requested that the Government represent to the Court that he took no position. The Government accurately reported that to the Court. *Id.* at n.2. On November 10, however, the defendant reversed course and filed a response in support of the applications. ECF No. 19. The defendant’s response did not engage with the relevant Federal Rule of Criminal Procedure or cite any applicable caselaw, and instead made false and incendiary claims about the administration of his criminal case, *United States v. Trump*, No. 23-cr-257 (TSC). The Government requests an opportunity to respond to the defendant’s claims and is prepared to file its proposed reply, which is four pages, immediately upon receiving leave from the Court.

The Government sought the positions of the applicants and the defendant on this motion

for leave to file. The defendant objects. NBC Universal Media, LLC, does not object. The Media Coalition wants the opportunity to address any issues raised by the Government's reply in its reply that is currently due on November 17, and accordingly does not object as long as the Government files its reply by November 14. As stated above, if given leave, the Government plans to file its reply immediately.

Respectfully submitted,

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