UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ALABAMA SOUTHERN DIVISION

DOYLE LEE HAMM,)
Plaintiff,)
V.) No. 2:17-cv-02083-KOB (JDB)
JEFFERSON S. DUNN, et al.,)
Defendant.)))

MOTION TO INTERVENE AND UNSEAL JUDICIAL RECORDS

Pursuant to Federal Rule of Civil Procedure 24, Advance Local Media LLC d/b/a Alabama Media Group, the *Montgomery Advertiser*, and The Associated Press (collectively, "Press Movants"), by and through their undersigned counsel, respectfully move to intervene and unseal the judicial records, transcripts, and briefs in this case discussing Alabama's execution protocols pursuant to the public's First Amendment and common-law rights of access.

Dated: March 28, 2018

Respectfully submitted,

By: <u>/s/ John G. Thompson</u>
One of the Attorneys for

Press Movants

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CERTIFICATE OF SERVICE

I hereby certify that on March 28, 2018, a true and correct copy of the foregoing was filed with Clerk of the Court using the CM/ECF system, which will send electronic notification to counsel of record.

/s/ Gabriella E. Alonso
OF COUNSEL