

Ronald M Adams
CLERK SUPERIOR COURT

IN THE SUPERIOR COURT OF GLYNN COUNTY
STATE OF GEORGIA

STATE OF GEORGIA

v.

TRAVIS MCMICHAEL
GREG MCMICHAEL
WILLIAM R. BRYAN

Case No. CR 2000433

REQUEST FOR EMERGENCY ORAL HEARING

Pursuant to Uniform Superior Court Rules 6.3 and 6.7, non-party Intervenors WXIA-TV d/b/a 11Alive in Atlanta, 13 WMAZ-TV in Macon, and WJXX/WTLV d/b/a First Coast News in Jacksonville, Florida (collectively, the “Tegna News Media Intervenors”) respectfully request that this Honorable Court schedule an emergency oral hearing on their Emergency Motion to Intervene and to Vacate Order Addressing Extra-Judicial Statements, filed contemporaneously herewith. The Order at issue and the relief sought in the Motion implicate the Tegna News Media Intervenors’ constitutional rights to gather and disseminate news of substantial public interest and concern to the public. Accordingly, and for the reasons set forth more specifically in the Motion, the Tegna News Media Intervenors respectfully submit that there is good cause for granting an immediate hearing and resolving the Motion on an expedited basis. The Tegna News Media Intervenors therefore respectfully request that the Court schedule a hearing on their Motion at the earliest practical time.¹

¹ In addition to the reasons set forth in their Motion, the Tegna News Media Intervenors respectfully submit that their Motion should be resolved as soon as possible because if the Gag Order is not vacated and, on appellate review, is determined to be unconstitutional, that ruling could have profound implications on the proceedings that occur in the interim. *See, e.g., Jackson*

Respectfully submitted this 14th day of October, 2021.

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and WJXX/WTLV d/b/a First Coast News

Uniform Superior Court Rule 36.4 Caption: **Request for Emergency Oral Hearing, State of Georgia v. Travis McMichael, et al.**, Superior Court of Glynn County, Georgia; Case No. CR 2000433.

v. State, 339 Ga. App. 313, 318-319 (2016) (reversing child molester’s convictions and remanding case for new trial, finding that although the evidence was sufficient to support his convictions, a new trial was required because the trial court entered a closure order that “did not comply with constitutional requirements” for restricting the public’s constitutional right of access to criminal trials, including “specific findings explaining why the closure is no broader than necessary to protect the movant’s interest” and “a full articulation of the alternatives to closure considered by the trial court” and “the reason or reasons why such alternative[s] would not afford the movant with an adequate remedy”); the Court of Appeals held that “[t]hese requirements cannot be avoided” and that the failure to satisfy them was “a structural error that must be remedied even without any showing of direct harm”) (internal punctuation and citations omitted).

CERTIFICATE OF SERVICE

This is to certify that I have this day served the following counsel with a true and correct copy of the above **REQUEST FOR EMERGENCY ORAL HEARING** via the Odyssey E-Filing system and via e-mail:

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This 14th day of October, 2021.

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