

FILED  
FIFTH DISTRICT COURT  
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WASHINGTON COUNTY

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Bonneville International Corporation d/b/a KSL-TV,  
Four Points Media Group of Salt Lake City, Inc.  
d/b/a KUTV 2 News, the Utah Media Coalition,  
and the Utah Headliners Chapter of the Society of  
Professional Journalists

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**IN THE FIFTH DISTRICT COURT IN AND FOR WASHINGTON COUNTY**  
**STATE OF UTAH**

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STATE OF UTAH,  
  
Plaintiff,  
  
vs.  
  
WARREN STEED JEFFS,  
  
Defendant.

**MOTION FOR LIMITED  
INTERVENTION OF FOUR  
POINTS MEDIA GROUP OF  
SALT LAKE CITY, INC. d/b/a  
KUTV 2 NEWS AND REQUEST  
FOR NOTICE OF MOTIONS TO  
CLOSE OR SEAL JUDICIAL  
PROCEEDINGS OR RECORDS**

Criminal No. 061500526

Judge James L. Shumate

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Pursuant to Rule 12 of the *Utah Rules of Criminal Procedure*, Rule 4-202.04(2)(D) of the *Utah Code of Judicial Administration*, and the Utah Supreme Court's decision in *Society of Professional Journalists v. Bullock*, 743 P.2d 1165, 1174-75 & n.9 (Utah 1987), Four Points Media Group of Salt Lake City, Inc. d/b/a KUTV 2 News ("KUTV"), through its undersigned counsel, hereby moves the Court for leave to intervene in the above-captioned case for the limited purpose of opposing any motion or request to prohibit or otherwise restrict public or news media access to any proceeding, record, or information in this case, and to seek the release of any materials in the court file that have already been sealed.


KUTV is a television broadcast station based in Salt Lake City engaged in the business of gathering and disseminating news and information of interest to the general public. KUTV regularly reports on proceedings before the Courts of this District and has extensively covered the proceedings in the above-captioned case. The grounds for this Motion are the same as those set forth in the Motion for Limited Intervention filed by the other Media Intervenors on or about April 18, 2007, which is incorporated herein by this reference. A proposed Order is submitted concurrently herewith.

By this filing, KUTV further requests notice of any petitions, motions or requests to seal, close, or limit public or press access to any court record, filing, or proceeding in the above-captioned case, and that counsel be afforded an opportunity to be heard and make argument to

the Court prior to the closure of any record or proceeding in the above-captioned case. See *Bullock*, 743 P.2d at 1178 n.15; Utah Code Jud. Admin. Rule 4-202.04(2)(D).

RESPECTFULLY SUBMITTED this 18 day of May 2007.

PARR WADDOUPS BROWN GEE & LOVELESS

  
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Jeffrey J. Hunt  
David C. Reymann

Attorneys for the Associated Press, Deseret News Publishing Company, publisher of the *Deseret Morning News*, *The Salt Lake Tribune*, *The Spectrum*, Bonneville International Corporation d/b/a KSL-TV, Four Points Media Group of Salt Lake City, Inc. d/b/a KUTV 2 News, the Utah Media Coalition, and the Utah Headliners Chapter of the Society of Professional Journalists

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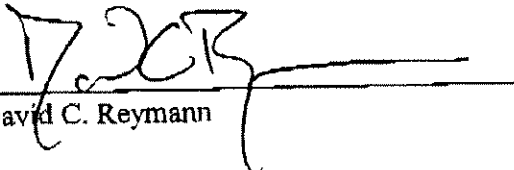
**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 18 day of May 2007, a true and correct copy of the foregoing **MOTION FOR LIMITED INTERVENTION OF FOUR POINTS MEDIA GROUP OF SALT LAKE CITY, INC. d/b/a KUTV 2 NEWS AND REQUEST FOR NOTICE OF MOTIONS TO CLOSE OR SEAL JUDICIAL PROCEEDINGS OR RECORDS** was sent via United States mail, postage prepaid, to:

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