

FILED
U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

DOCKETED

SEP 26 4 35 PM '85

CIVIL ACTION NO. 82-1672-S

ANNE ANDERSON, ET AL.,)	
)	
Plaintiffs)	MOTION OF WGBH EDUCATIONAL
)	FUND AND THE CHEDD-ANGIER
V.)	PRODUCTION COMPANY TO INTERVENE
)	PURSUANT TO RULE 24 OF THE
CRYOVAC, INC., ET AL.,)	FEDERAL RULES OF CIVIL
)	PROCEDURE
Defendants)	

NOW COME the WGBH Educational Fund ("WGBH") and the Chedd-Angier Production Company ("Chedd-Angier") and move to intervene in this action pursuant to Rule 24 of the Federal Rules of Civil Procedure. The intervention is sought only with respect to this Court's Order of September 4, 1985, which prohibits the parties, their attorneys and their experts from making public statements "relating to this case." The grounds for this motion are as follows:

1. As set forth in the complaint of the Intervenor filed contemporaneously with this motion, WGBH and Chedd-Angier are in the process of producing a television documentary for the Public Broadcasting Service concerning the national problem of hazardous waste. The documentary features a "case study" concerning hazardous waste in Woburn.

2. This Court's Order of September 4, 1985, prevents WGBH and Chedd-Angier from obtaining the information necessary to produce the Woburn "case study." Because the Woburn "case

*Allowed. 10/1/85
W. Woburn, Mass.*

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study" is a critical part of the hazardous waste documentary, this Court's Order will effectively prevent Chedd-Angier from continuing with production of the hazardous waste documentary.

3. In circumstances similar to the case at bar, representatives of the press have successfully intervened in cases where lower courts have issued orders restricting the dissemination of information by counsel to the press.

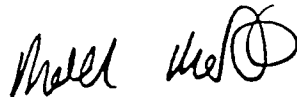
See, e.g., In Re San Juan Star Co., 662 F.2d 108 (1st Cir. 1981).

4. In support of this motion, the Intervenors also submit the Affidavits of John Angier and William Grant.

Respectfully submitted,

WGBH EDUCATIONAL FUND and CHEDD-
ANGIER PRODUCTION COMPANY

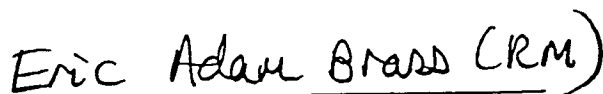
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