

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

UNITED STATES OF AMERICA,
PLAINTIFF,

-V-

AT&T INC.;
DIRECTV GROUP HOLDINGS, LLC; AND
TIME WARNER INC.;
DEFENDANTS.

Civil Action No. 17-cv-02511 (RJL)

**MOTION FOR LEAVE TO FILE *AMICUS CURIAE* BRIEF AND [PROPOSED]
AMICUS CURIAE BRIEF OF DR. CARTER PAGE IN SUPPORT OF
PLAINTIFF'S COMPLAINT**



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Bankruptcy Courts

INTRODUCTION

Pursuant to Local Civ. Rule 7(o)(1)–(2), Carter Page, Ph.D. (“Dr. Page”), respectfully moves for leave to file the attached brief in support of Plaintiff’s Complaint as *amicus curiae* in the above captioned case. Plaintiff has been notified of his pre-motion intent to file this associated brief and their representatives have expressed no objection. In most of Dr. Page’s discussions and interviews with representatives of Defendant Time Warner’s CNN division over the past year, they have expressed limited interest in Dr. Page’s detailed applicable perspectives and arguments including many of the fundamentally inherent elements of the substantive contributions found in the proposed *amicus curiae* brief. A similar response is expected here.

ARGUMENT

Dr. Page can provide unique and useful information and perspective to the Court.

District courts have inherent authority to allow participation as *amicus curiae*. *Jin v. Ministry of State Sec.*, 557 F. Supp. 2d 131, 136 (D.D.C. 2008) (quoting *Smith v. Chrysler Fin. Co., L.L.C.*, No. Civ.A. 00-6003(DMC), 2003 WL 328719, at *8 (D.N.J. Jan. 15, 2003)). And, the Court has broad discretion in deciding whether to grant a third party leave to file an *amicus curiae* brief. *Nat’l Ass’n of Home Builders v. U.S. Army Corps of Eng’rs*, 519 F. Supp. 2d 89, 93 (D.D.C. 2007).

“Generally, ‘a court may grant leave to appear as an *amicus* if the information offered is timely and useful.’” *Ellsworth Assocs., Inc. v. United States*, 917 F. Supp. 841, 846 (D.D.C. 1996) (quoting *Waste Mgmt. of Pa., Inc. v. City of New York*, 162 F.R.D. 34, 36 (M.D. Pa. 1995) (internal quotation omitted)). An *amicus* brief should be allowed “when the *amicus* has unique information or perspective that can help the court beyond the help that the lawyers for the parties

are able to provide.” *Cobell v. Norton*, 246 F. Supp. 2d 59, 62 (D.D.C. 2003) (quoting *Ryan v. CFTC*, 125 F.3d 1062, 1063 (7th Cir. 1997)).

Amicus curiae Carter Page, Ph.D. (“Dr. Page”) is the Managing Partner of Global Energy Capital LLC, a New York Corporation with principal offices in New York City. Throughout much of the past twenty years, he has made contributions as a scholar in the fields of foreign policy and international political economy. In this capacity, he has often served as an adjunct or evening faculty member at institutions of higher education as well as a research fellow at foreign policy think tanks. In 2016, Dr. Page similarly volunteered as a junior, unpaid, informal advisor to the Donald J. Trump for President campaign (the “Trump Campaign”). His ability to make any supportive contribution as a private citizen during this American democratic process last year was effectively blocked. The related diverse array of obstruction of justice abuses in violation of many Constitutional rights primarily stemmed from illicit activities undertaken by major participants in the U.S. telecommunications-media oligopoly and their illegal de facto joint venture marketing partners in the U.S. Government (“USG”) propaganda network. Based on preliminary accounts from these institutions¹ and associated unfulfilled appeals by members of Congress, Dr. Page is believed to have been illicitly hacked in 2016.

Prior to the severe disruption to his life stemming from the U.S. Government’s meddling in the 2016 election, Dr. Page spent over 15 years as a finance practitioner in mergers and acquisitions (“M&A”) as well as a diverse array of capital markets transactions. In addition to his firsthand experience with each current and proposed institution in the U.S.

¹ “FBI Reportedly Monitored Trump Campaign Adviser For Russia Contacts,” Radio Free Europe / Radio Liberty, April 12, 2017. <https://www.rferl.org/a/fbi-monitored-trump-campaign-adviser-russia-contacts-washington-post-reported/28424682.html>

telecommunications-media oligopoly, these practical M&A insights offer unique perspectives relevant to the review of AT&T's case for joining this elite club.

CONCLUSION

For the foregoing reasons, Dr. Page respectfully requests that his motion for leave to file the accompanying brief be granted.

Dated: December 12, 2017

Very respectfully,

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**[PROPOSED] ORDER GRANTING MOTION FOR LEAVE TO FILE *AMICUS*
CURIAE BRIEF OF DR. CARTER PAGE IN SUPPORT
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THIS MATTER came before the court on the motion of Dr. Page for leave to file a brief as *amicus curiae* in support of Plaintiff's complaint. The Court, having considered the motion and any opposition, HEREBY ORDERS that the motion for leave to file a brief as *amicus curiae* is GRANTED.

DATED this _____ day of _____, 2017.

The Honorable Richard J. Leon

CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2017, I hand delivered the foregoing document to United States Court for the District of Columbia. I respectfully request that notice and service of this filing to counsel of record for the parties be made by the Court through the CM/ECF system.

Dated: December 12, 2017

By: /s/ Carter Page 

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