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OF WISCONSIN

SUPREME COURT OF WISCONSIN

Case No. 2013AP2504 - 2508-W

Case No. 2014AP296-OA

Case No. 2014AP417 - 421-W

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STATE OF WISCONSIN *ex rel.* THREE UNNAMED PETITIONERS,

Petitioner,

v.

Case Nos. 2013AP2504 - 2508-W

THE HONORABLE GREGORY A. PETERSON, John Doe Judge, THE  
HONORABLE GREGORY POTTER, Chief Judge, and FRANCIS D.  
SCHMITZ, Special Prosecutor

Respondents,

L.C. Nos. 2013JD11, 2013JD9, 2013JD6, 2013JD1, 2012JD23

[CAPTIONS CONTINUED ON FOLLOWING PAGE]

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**NOTICE OF MOTION AND MOTION TO INTERVENE  
OF JOURNAL SENTINEL, INC.**

Steven P. Mandell  
State Bar No. 1095665  
Natalie A. Harris  
State Bar No. 1036133  
Mandell Menkes LLC  
One North Franklin, Ste. 3600  
Chicago, IL 60606  
(312) 251-1000

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STATE OF WISCONSIN *ex rel.* TWO UNNAMED PETITIONERS,  
Petitioner,

v.

Case No. 2014AP296-OA

THE HONORABLE GREGORY A. PETERSON, John Doe Judge, and  
FRANCIS D. SCHMITZ, Special Prosecutor

Respondents,

L.C. Nos. 2012JD23, 2013JD1, 2013JD6, 2013JD9, 2013JD11

STATE OF WISCONSIN *ex rel.* FRANCIS D. SCHMITZ, Special  
Prosecutor,

Petitioner,

v.

Case Nos. 2014AP417 - 421-W

THE HONORABLE GREGORY A. PETERSON, John Doe Judge,

Respondent,

and

EIGHT UNNAMED MOVANTS,

Interested Parties.

L.C. Nos. 2013JD11, 2013JD9, 2013JD6, 2013JD1, 2012JD23

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PLEASE TAKE NOTICE that the Proposed Intervenor Journal Sentinel, Inc., publisher of the *Milwaukee Journal Sentinel* (the "Newspaper"), by its attorneys, Steven P. Mandell and Natalie A. Harris, hereby moves the Court for leave to intervene in this matter pursuant to Wis. Stat. § 803.09(1). Journal Sentinel, Inc. attaches to this motion its supporting Memorandum of Law.

This motion will be heard at a time, date, and place to be set by the Court.

As grounds for this motion, the Newspaper states that the issues currently on appeal to this Court are of extreme statewide interest and importance. As of the date of filing this motion, the filings in this matter are entirely under seal. Further, the Court has recently asked the parties to express their respective positions regarding, among other things, whether some or all of the oral argument scheduled for next month should be closed to the public. The Newspaper hereby moves the Court for leave to intervene in this matter, pursuant to Wis. Stat. § 803.09(1), for the limited purpose of asserting its right, as a surrogate for the public, to access the Court's proceedings and records. The grounds for this motion are more fully detailed in the

accompanying Memorandum of Law.

Dated: March 11, 2015

Respectfully submitted,

A handwritten signature in black ink, reading "Steven P. Mandell", is written over a solid horizontal line.

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