100 #11

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

IN RE APPLICATION OF AMERICAN:
LAWYER NEWSPAPERS GROUP, INC.,
PUBLISHER OF THE AMERICAN LAWYER,
MANHATTAN LAWYER, AND LEGAL TIMES:

MISC. NO. 7/1

UNITED STATES OF AMERICA

v. : 87 Crim. 378 (MEL)

IVAN F. BOESKY,

Defendant.

APPLICATION OF AMERICAN LAWYER NEWSPAPERS GROUP, INC.

American Lawyer Newspapers Group, Inc., publisher of The American Lawyer, Manhattan Lawyer, and Legal Times ("American Lawyer"), hereby applies to this Court for the unsealing of papers submitted in connection with the sentencing of Ivan Boesky. Specifically, American Lawyer requests that the United States Attorney's Office's report, the presentence report submitted by the U.S. Probation Department, and the briefs or reports submitted by Mr. Boesky, including all materials such as letters sent to the Court on his behalf, be unsealed.

As set forth in greater detail in the Memorandum of Law, which accompanies this application, the relief sought here is grounded upon constitutional principles and is specifically authorized by, inter alia, controlling authority in this Circuit. The relief would advance the public interest by increasing public knowledge about what this Court itself has recognized is a most significant case.

American Lawyer respectfully requests oral argument on this Application.

Dated: New York, New York December 11, 1987

Respectfully submitted,

CAHILL GORDON & REINDEL (a partnership including professional corporations)

Bv:

Floyd Abrams

80 Pine Street New York, New York 10005 (212) 701-3000

Attorneys for Applicant American Lawyer Newspapers Group, Inc.