



LAW OFFICE OF  
STEVEN D. ZANSBERG, LLC

September 9, 2021

via email [[WHAp0@cand.uscourts.gov](mailto:WHAp0@cand.uscourts.gov)]

Hon. William Alsup  
United States District Court for the Northern District of California  
Courtroom 12  
450 Golden Gate Avenue  
San Francisco, CA 94102

Re: *United States v. Pacific Gas and Elec. Co.*, No. 3:14-cr-00175

Dear Judge Alsup:

This law firm represents TEGNA Inc., the corporate owner of television station KXTV-TV (ABC10) in Sacramento. You may recall that in March 2019, Special Projects Reporter Brandon Rittiman wrote to you, on behalf of the station, to request that a prior court proceeding in the PG&E case be open to electronic recording for the public's benefit, but that request was denied on grounds that the station was required to appear through counsel.

I write to respectfully ask that your Honor allow KXTV-TV to record for subsequent broadcast the Zoom audio transmission of the testimony of "the troubleman," the individual who first responded to the Dixie Fire, at the probation hearing on September 13, 2021.

As you are well aware, the nearly one-million-acre Dixie Fire continues to burn and both its cause/origin and the devastation it has inflicted continue to garner tremendous public interest and concern. We recognize that Federal Rule 53 of the Federal Rules of Criminal Procedure generally prohibits the broadcast of criminal proceedings occurring in United States District Courts. Nevertheless, in light of the tremendous public interest in this crucial witness' testimony, we are asking if your Honor might be aware of some exception by which you may authorize such recording and broadcast in these unique circumstances, so that the public can directly experience the testimony rather than relying on a verbal recitation thereof by the press. *See, e.g., United States v. Antar*, 38 F.3d 1348, 1359-60 n.13 (3d Cir. 1994) (holding that a transcript is not an adequate substitute for public access because "information[] concerning demeanor, non-verbal responses, and the like, is necessarily lost in the translation of a live proceeding to a cold transcript").

Thank you for considering this request.

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Sincerely,

A handwritten signature in blue ink that reads "Steve Zansberg". The signature is written in a cursive, flowing style.

Steven D. Zansberg

cc: Counsel of record