

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF WESTCHESTER

PROJECT VERITAS,

Plaintiff,

v.

THE NEW YORK TIMES COMPANY, MAGGIE  
ASTOR, TIFFANY HSU, and JOHN DOES 1-5,

Defendants.

ORDER TO SHOW CAUSE

Index No. 63921/2020

Hon. CHARLES D. WOOD  
JUSTICE SUPREME COURT

UPON reading and filing the accompanying Plaintiff Project Veritas' Memorandum of Law in Support of Plaintiff's Motion Pursuant to CPLR § 3103 for an Order to Show Cause for the Protection of Attorney-Client Privileged Information Improperly Obtained and Published by The New York Times, and upon the Affidavit of Elizabeth M. Locke, P.C., attorney for Plaintiff, dated November 17, 2021, and all exhibits annexed thereto,

NOW LET Defendant, The New York Times Company, or its attorneys, show cause before the IAS Part of the Supreme Court of the State of New York, Westchester County, on November 23, 2021, at 11:00 A.M. in courtroom 1200, or as soon as counsel may be heard, why:

*clpa*

- 1) an order should not be entered directing Defendant The New York Times to remove all references to or descriptions of Plaintiff Project Veritas's privileged attorney-client information published on The New York Times' website on November 11, 2021, and to return and/or immediately delete all copies of Project Veritas' attorney-client privileged materials that are in The New York Times' possession;
- 2) an interim order should not be entered directing The New York Times to sequester and refrain from further publishing any of Plaintiff Project Veritas' attorney-client privileged materials, and to cease further efforts to solicit and acquire Project Veritas' attorney-client privileged materials; and,
- 3) Plaintiff should not have other and further relief as may be just, proper, and equitable.

**ORDERED** that, until such time as this Court resolves the Order to Show Cause, Defendant The New York Times shall immediately sequester, protect, and refrain from further disseminating or publishing any of Plaintiff Project Veritas' privileged materials in the possession of The New York Times, or its counsel, and that The New York Times and its counsel shall cease further efforts to solicit or acquire Plaintiff Project Veritas' attorney-client privileged materials.

**SUFFICIENT CAUSE HAVING BEEN SHOWN**, service of a copy of this Order, and the other papers upon which this Order is granted, upon the Defendants shall be made via <sup>USPS</sup> ~~Federal~~ Express <sup>MAIL and</sup> or email by November 19, 2021. An affidavit or proof of service shall be presented to this Court on or before the return date directed in this Order.

*copy*

Entered: *CW*  
Hon. CHARLES D. WOOD  
JUSTICE SUPREME COURT