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Presiding Judge Rick Roberts

First Judicial Circuit

% Scotland County Circuit Clerk Julie Monroe

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CC: Plaintiff Counsel – Attorney Lowell Pearson – lowell.pearson@huschblackwell.com

CC: Defendant Counsel – Attorney Eric Packell – epackel@polsinelli.com

August 21, 2024**To the Honorable Rick Roberts:**

I am writing to respectfully request permission from the Court to video record and take still photographs during the public bench trial scheduled for September 23, 2024, at 9:00 a.m., or any subsequent date to which the case might be continued, in Case No. 23SE-CC00015 - *Randall Tobler, MD v. Scotland County Memorial Hospital et al.*, in Scotland County.

I am a member of the news media covering the First Judicial Circuit, reporting for the NEMOnews Media Group, which includes newspapers and websites across Clark, Scotland, and Schuyler counties, as well as additional publications serving Knox, Lewis, Marion, Shelby, and Sullivan counties. My official title is Editor of *The Edina Sentinel*, and I also contribute to the regional website nemonews.net.

I have reviewed Missouri's Court Operating Rule 16 and fully agree to adhere to its guidelines.

The equipment I respectfully request permission to bring into the courtroom includes:

- One low-profile digital video recording device (Samsung Note 20 smartphone), capable of recording high-definition video, operating silently, and configured to remain offline during the court proceedings.
- One low-profile Olympus OMD-M1 still photography camera, which can be configured to eliminate shutter sounds and operates without a flash.
- One low-profile collapsible tripod.

If permission is granted, I respectfully request to be seated in the front row corner closest to the well of the gallery in the Scotland County courtroom, to the right of the Judge and Court Clerk's positions, and to the left of the counsel positions, to ensure a clear view of the Judge, counsel, and witness stand.

I agree to pool any video and/or still photographs obtained during the proceedings with other news media outlets interested in the case, providing them electronically upon request within a reasonable timeframe shortly after the trial has concluded.

I respectfully ask the Court to consider the following:

- I am well-versed in documenting public meetings and court proceedings for news coverage, having logged hundreds of hours of video in similar settings without being a distraction. I use minimal space, make little movement, and operate quiet, low-profile equipment.
- I understand and respect the Court's guidelines as outlined in Court Operating Rule 16.
- This case is of significant public interest.

Should Your Honor have any questions or require any specific directions beyond those outlined in Court Operating Rule 16, please do not hesitate to contact me.

Respectfully,

Echo Menges
