IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

CABLE NEWS NETWORK, INC., MS NOW CABLE, LLC, POLITICO LLC, ET AL., *Plaintiffs,* v. DONALD J. TRUMP, ET AL., *Defendants.*	Civil Case No. 1:26-cv-03287-TJK **DECLARATION OF SUDEEP REDDY**

DECLARATION OF SUDEEP REDDY

I, Sudeep Reddy, hereby declare as follows:

1. I am over 18 years of age, am competent, and make this declaration based upon my own personal knowledge, my review of MS NOW's business records, and information provided to me in the course of my duties by MS NOW personnel with knowledge of the matters described. I am the Washington Bureau Chief of MS NOW Cable, LLC (MS NOW), a Plaintiff in this action. I make this declaration in support of Plaintiffs' Motion for a Further Preliminary Injunction. If called to do so, I could and would competently testify to these matters under oath.

2. I have served as MS NOW's Washington Bureau Chief since June 2025. In the course of my duties, I am familiar with MS NOW's White House operations, including the White House credentials its journalists hold, its participation in the White House press pool, and the workspaces and equipment MS NOW maintains on the White House complex.

3. MS NOW operates a cable news network and a digital news service. It launched in 1996 as MSNBC and adopted the name MS NOW in November 2025 in connection with its separation from NBCUniversal. MS NOW has covered every presidency since the Clinton

administration. MS NOW assigns around ten journalists to the White House full time, and around fifteen MS NOW journalists regularly cover it.

4. In connection with its separation from NBCUniversal, which long has had a place in the primary television network pool, MS NOW independently sought a place in the secondary television network pool rotation. The White House began designating MS NOW for secondary television network pool assignments in March 2026.

5. There are more than a dozen news outlets in the secondary television network pool. Every week, the White House Press Office identifies a member of the secondary television network pool to serve as the pooler each day of that week, alongside rotating members of the primary television network, print, radio and digital media pools. In the seven months before September 18, 2026, MS NOW was designated to serve as the secondary television pooler roughly every two to three weeks—on March 2, March 9, April 3, May 1, May 13, May 28, June 30, July 22, August 15, and August 30, 2026.

6. On days when MS NOW served as the secondary television pooler, its journalists were eligible to enter, with the rest of the pool, the Oval Office and other areas and presidential events that the White House opens to the press pool, and to travel with the President on in-town trips around the Washington, D.C. area. Pool members like MS NOW can observe the President and people who interact with him, ask questions, capture video and still photography, report in real time to the American public and the wider press corps, message their colleagues as events unfold, and at times transmit live coverage while an event is happening.

7. When MS NOW was designated to serve as the day's secondary television network pooler, White House staff coordinated pool call times and other logistics with MS NOW and admitted its journalists to the events designated for pool coverage. Before September 18, 2026,

the White House consistently recognized and facilitated MS NOW's pool participation in this manner. To my knowledge, it had never removed MS NOW from a scheduled secondary pool rotation, declined to include it in the rotation, or excluded one of its journalists from a pool event on a day when it was a designated pooler. The White House also has never, to my knowledge, articulated any standard governing an outlet's removal from the secondary television pool rotation or exclusion from pool events.

8. The White House has not designated MS NOW to serve as the secondary television pooler since the President announced the September 18, 2026 ban, thereby excluding MS NOW from the spaces and events that it would have accessed as a secondary pool designee.

9. The White House gave MS NOW no notice before it stopped including the network in the secondary television pool rotation. It has never informed MS NOW that the network has been removed from the rotation or will not be permitted to serve as a secondary television pooler for any period. Nor has it articulated any standard governing the exclusion, explained its decision, or afforded MS NOW an opportunity to contest it. To my knowledge, the White House has not identified any process by which MS NOW could challenge its exclusion or any date on which the exclusion will end. MS NOW stands ready to resume its role in the secondary television pool.

10. MS NOW's continued exclusion from the secondary television pool rotation means that its journalists are not eligible to cover the President in the Oval Office and other areas and events open only to pool members. Unless Defendants are enjoined, MS NOW will continue to miss those opportunities.

11. The White House's continued exclusion of MS NOW from areas and events open to pool members harms MS NOW in ways that cannot be measured or repaired after the fact. It impedes MS NOW's ability to gather news firsthand at the seat of the Executive Branch. A

question an MS NOW journalist is not present to ask is a question that goes unanswered. A pool event MS NOW cannot cover is an event MS NOW cannot report on for its audience, and that coverage cannot be recreated once the moment has passed.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 2nd day of November 2026 in Washington, D.C.

Sudeep Reddy