UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KENNETH ROTH; DANIEL FROOMKIN; BEVERLY GAGE; PETER SCHMIDT-NOWARA; BENJAMIN WITTES; and ETHAN YOUNG, Plaintiffs, v. DONALD J. TRUMP, in his official capacity as President of the United States; STEVEN CHEUNG, in his official capacity as Assistant to the President for Communications; SEAN M. CURRAN, in his official capacity as Director of the Secret Service; and SUSAN WILES, in her official capacity as White House Chief of Staff, Defendants.	Civil Action No.

DECLARATION OF ETHAN YOUNG

I, Ethan Young, declare and state as follows:

1. I am a plaintiff in this matter and am submitting this declaration in support of a motion for a preliminary injunction.

2. I am over the age of eighteen. I have personal knowledge of the facts stated in this declaration, and, if called to testify, I could and would competently do so under oath.

3. I am a resident of Philadelphia, P.A., and a citizen of the United States.

4. I am a senior at the University of Pennsylvania, where I major in History and Political Science. I am also a student journalist and the editor-in-chief of the Daily Pennsylvanian, the University of Pennsylvania's independent, student-run newspaper. The paper has a large

readership and a wide reach: over 12,000 people subscribe to its newsletters; its website has over 6 million pageviews annually; and its social media accounts have over 90,000 followers across all platforms. As editor-in-chief, I report and edit articles published in the Daily Pennsylvanian, in addition to overseeing the news, sports, and opinion sections of the paper.

5. Every day, I rely extensively on White House reporting to fulfill my responsibilities as editor-in-chief of the Daily Pennsylvanian. Through a mix of my institutional and personal accounts, I subscribe to and read the New York Times, the Associated Press, the Washington Post, the Philadelphia Inquirer, the Wall Street Journal, POLITICO, the Chronicle of Higher Education, and the Washington Sun, among others. I also rely on the social media platform X (formerly known as Twitter) for newsgathering purposes. On X, I follow the institutional accounts of many of the same White House news outlets to which I subscribe, the White House Press Pool Reports account (@WHPressPool), and a number of individual White House reporters, including Sophia Cai of POLITICO, Natalie Andrews of the Wall Street Journal, Betsy Klein and Kaitlan Collins of CNN, and Jennifer Jacobs of CBS. Because my X feed is tuned to my interest in national politics, I often encounter and read posts by White House reporters whom I do not formally follow, including Weijia Jiang of CBS, Josh Dawsey of the Wall Street Journal, Jacqui Heinrich of Fox News, and Emily Goodin of the New York Post.

6. As a student journalist based in Philadelphia, I cannot personally access White House press spaces, but I nevertheless require reliable information about the president and his administration to report and edit stories for the Daily Pennsylvanian. This is especially true given the Trump administration's actions regarding higher education, generally, and the University of Pennsylvania, specifically. As editor-in-chief, I consider it my responsibility to help deliver

relevant news that facilitates an informed discourse on campus. I therefore rely on a diverse, independent, and trustworthy cohort of White House reporters to serve as my proxy.

7. Many articles that I personally report and edit for the Daily Pennsylvanian rely on White House reporting. For example, I edited a March 19, 2025, article about the Trump administration's freeze of federal funding to the University of Pennsylvania. **Exhibit 1** (available at https://perma.cc/B62U-NVM4). In that article, we relied on reporting by Fox Business, which revealed that a White House official threatened that the funding freeze was "just a taste of what could be coming down the pipe for Penn." **Exhibit 2** (available at https://perma.cc/PCJ8-WY7F; https://x.com/RapidResponse47/status/1902346386357572046). On July 1, 2025, the day that the University announced it had struck a deal with the Trump administration to recoup its funding, I began writing and editing a live blog for the Daily Pennsylvanian's website, which I continued into the next day, when the University announced it had recouped the funding. **Exhibit 3** (available at https://perma.cc/YUU6-7FBR). In the blog, I relied on and cited White House reporting from CNN. **Exhibit 4** (available at https://perma.cc/78UE-2KCQ). And a March 20, 2025, article that I edited about President Trump's executive order aimed at dissolving the Department of Education cited the Washington Post's reporting on a statement that White House Press Secretary Karoline Leavitt made to journalists about the government's intentions behind the executive order. **Exhibit 5** (Daily Pennsylvanian article) (available at https://perma.cc/P8Q3-NCM7); **Exhibit 6** (Washington Post article) (available at https://perma.cc/64RT-GQDJ).

8. Because President Trump's press ban policy means that there are fewer reporters and outlets covering his activities, I am deprived of the comprehensive reporting that I depend on to report and edit articles for the Daily Pennsylvanian. It is precisely the number and variety of outlets, reporters, and perspectives represented in the White House press corps that makes their

collective reporting valuable for those of us who cannot personally access the same spaces and ask follow-up questions. I know from experience that different reporters invariably ask different questions and pursue different leads; together, their reporting coalesces into a more comprehensive representation of the president, his actions, and his administration.

9. President Trump's press ban policy interferes with my ability to access the rigorous, comprehensive White House reporting that I depend on to deliver news to the University of Pennsylvania community. When any outlet is excluded from the White House press corps, there is inevitably less coverage of any given issue and less information shared with the broader news ecosystem, including with the Daily Pennsylvanian. Because there is no shortage of newsworthy executive actions in this administration, when a greater number of outlets has access to White House press spaces, it is less likely that important information will fall through the cracks. This would be true even if the press ban policy were agnostic as to the perceived ideological orientation of reporters and news outlets, but the fact that the policy explicitly retaliates against news outlets for their purportedly unfavorable coverage of President Trump and his administration exacerbates the access and information gap.

10. If President Trump is empowered to retaliate against news organizations for the way they report on him and his administration, it will be significantly more difficult for journalists, including student journalists, to do our work. Without a legal restraint on this policy of ideologically motivated retaliation, I believe that the exclusion of disfavored reporters and news outlets will continue eroding my access—and the access of my peers at other student newspapers across the country—to the information we need to produce high quality, reliable, and accurate journalism for our readers.

11. Student reporting is an essential part of the news ecosystem. As the news industry suffers from mass consolidation and as many local and regional newspapers are either absorbed by larger corporate media organizations or shutter altogether, student newspapers assume an increasingly significant role. Student newspapers break important stories, inform their particular audiences, facilitate campus discourse, and serve as training grounds for the next generation of journalists. I want and intend to pursue a career in journalism, but I can only see the news industry as viable when the press is unconstrained by repressive, censorial policies.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: October 23, 2026

Ethan Young