**IN THE UNITED STATES DISTRICT COURT**
**FOR THE DISTRICT OF COLUMBIA**

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| CABLE NEWS NETWORK, INC. MS NOW CABLE, LLC, POLITICO LLC, ET AL.,<br><br>*Plaintiffs*,<br><br>v.<br><br>DONALD J. TRUMP, ET AL.,<br><br>*Defendants*. | Civil Case No. _____<br><br>**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 Temporary Restraining Order and 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.

**MS NOW and Its Coverage of the White House**

3. MS NOW is a Delaware limited liability company with its principal place of business in New York, New York. 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 as part of Comcast's spin-off of Versant Media Group, Inc.

4. MS NOW operates across multiple media platforms. In August of 2026, MS NOW averaged more than 1.2 million television viewers in weekday primetime and 812,000 viewers across weekday live programming. Year to date in 2026, MS NOW has recorded 3.5 billion combined viewers across the social media and video platforms YouTube and TikTok and averages approximately 30 million unique monthly visitors online. As of August 2026, MS NOW reaches more than 38 million Americans across platforms.

5. MS NOW has covered the White House continuously since 1996 and has covered every Presidency since the Clinton administration. MS NOW maintains a Washington, D.C. bureau of approximately 100 journalists, of whom approximately ten are assigned full time to covering the White House and approximately fifteen regularly cover the White House. Each of the MS NOW journalists who regularly covers the White House holds a White House hard pass. MS NOW's White House team is led by Scott Foster, MS NOW's Director, White House, and includes Senior White House Reporter Vaughn Hillyard; White House Reporters Laura Barrón-López, Akayla Gardner, and Jake Traylor; and the producers, photographers, and technicians who support them.

6. Each day, MS NOW dispatches journalists to the White House grounds, working from the briefing room, the West Wing driveway, a basement press booth, and other areas of the grounds used for live reporting. While on the grounds, MS NOW journalists meet with White House staff, speak with administration officials, attend open-press events, and attend formal press briefings.

**MS NOW's White House Hard Passes**

7. Access to the White House press facilities is controlled through a credential known as a "hard pass," which is issued by the White House and is available to journalists who regularly cover the White House, are based in the Washington, D.C. area, are accredited by a press gallery of the United States Senate, the United States House of Representatives, or the Supreme Court, and clear a Secret Service background check. A hard pass enables its holder to enter the White House complex on short notice and with minimal delay so that we can cover news made by the President and his administration on-site.

8. As of September 18, 2026, immediately before the President announced the ban, 22 MS NOW journalists—two directors, six reporters, six producers, and eight photographers—held valid White House hard passes. Before September 19, 2026, to my knowledge, no President had barred either MS NOW as an organization, or its reporters, from the White House.

9. As a practical matter, a hard pass is an essential requirement to work as a White House journalist for a national news organization such as MS NOW. Without one, MS NOW's journalists are severely hampered from doing their jobs.

**MS NOW's Participation in the White House Press Pool**

10. Because most Presidential events take place in spaces too small to accommodate the full White House press corps, the White House has for decades relied on a "press pool"—a small, rotating group of journalists who attend events on behalf of all credentialed journalists and share what they gather with the rest of the press corps. Because the Oval Office, Air Force One, Marine One, and many other settings in which the President appears cannot accommodate the full White House press corps, the pool is often the only press presence in those settings, and it accompanies the President when he travels.

11. Each day, the pool includes representatives from different media channels, including television, print, radio, and "new media." The television component of the pool consists of two slots: primary and secondary. The primary slot rotates among five networks—ABC, CBS, CNN, Fox News, and NBC. The secondary slot rotates among a larger group of outlets, and includes MS NOW. When MS NOW is assigned to the secondary television pool, it generally assigns one or two journalists—at least a reporter or a producer, and sometimes a photographer in place of a producer.

12. MS NOW bears substantial costs to operate from the White House, including journalist staffing, engineering support, and equipment costs. When MS NOW serves in the secondary pool, it does so by reassigning members of its regular White House staff.

13. In the eight months preceding September 18, 2026, MS NOW journalists served in the White House press pool approximately ten times—nine times as part of the President's pool, on March 2, March 9, May 1, May 13, May 28, June 30, July 22, August 15, and August 30, 2026, and once, on September 15, 2026, as part of the First Lady's pool. On some of those occasions, the pool accompanied the President off the White House grounds, including to his golf course in Sterling, Virginia.

**The September 18, 2026 Ban**

14. On September 18, 2026, the President announced on Truth Social, in a post published at approximately 3:04 p.m. Eastern Time, that he was "banning" MS NOW and others from the White House "effective immediately."

15. MS NOW received no written notice of the ban from the President, the White House Press Office, the Office of Communications, the Secret Service, or any other White House official. No one has advised MS NOW of the scope or duration of the ban, or of any process by which MS

NOW may respond to or contest it. On September 19, 2026, the White House Press Office again declined to answer questions from news organizations about the ban and referred them to the President's prior remarks.

16. To my knowledge, MS NOW's only communications with the White House concerning the ban have been those Ms. Gardner describes in her declaration. No one at the White House has directed MS NOW to any official or office to which it could raise questions about the ban.

17. MS NOW journalists remained on the White House grounds through the evening of September 18, 2026, after the President's post. No White House official contacted MS NOW that evening to say whether, when, or how the ban would be enforced. To the contrary, on the evening of September 18, 2026, after the President's post, MS NOW was included in a White House press call previewing the President's schedule for the coming week.

18. On the morning of Saturday, September 19, 2026, an MS NOW photographer arrived at the White House to work and was denied entry; his hard pass was deactivated and taken from him. At approximately 8:00 a.m. that morning, Ms. Gardner arrived at the White House with an MS NOW producer. When Ms. Gardner attempted to scan her hard pass at the Secret Service screening checkpoint, the reader rejected it; the Secret Service officer told her that her badge had been disabled and did not permit her to keep the pass. The producer's hard pass was accepted, and she was admitted; Ms. Gardner left the grounds by the path she had entered.

19. Since the producer entered the complex on the morning of September 19, 2026, MS NOW has not attempted to send any other journalist onto the White House complex, and it made no attempt to enter on September 20, 2026.

20. To my knowledge, no MS NOW journalist who was turned away received a written statement of the reason for the denial, an opportunity to respond, or any information about the duration of the ban or how access might be restored.

21. MS NOW's workspace, broadcast positions, cameras, and transmission equipment remain inside the White House complex. On September 19 and 20, 2026, MS NOW broadcast its White House coverage from a public street corner at 17th Street and Pennsylvania Avenue NW, across from the White House grounds.

22. As of the time I sign this declaration, MS NOW has not received the White House press pool schedule for the week of September 21, 2026, and does not know whether it has been removed from the secondary pool rotation.

**The Harm to MS NOW**

23. As long as the ban remains in place, MS NOW cannot attend press briefings, cannot report from its broadcast positions on the grounds, cannot attend events open to hard pass holders, and cannot serve in the pool.

24. Specifically, the President is expected to host President Xi Jinping of the People's Republic of China for a state visit at the White House on Thursday, September 24, 2026. Unless the ban is lifted, MS NOW's journalists will be unable to enter the White House complex to cover the state visit or any other event on the grounds that week, and MS NOW will be unable to serve in any pool rotation to which it would otherwise be assigned.

25. That harm has already begun. On September 19 and 20, 2026, MS NOW's journalists were unable to use MS NOW's workspaces on the White House grounds, including the tented live-shot position from which MS NOW ordinarily broadcasts, and MS NOW instead reported from a public street corner outside the complex.

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 20 day of September 2026 in Washington, D.C.

Sudeep Reddy