IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

THE ASSOCIATED PRESS, Plaintiff, v. TAYLOR BUDOWICH, et al., Defendants.	Case No. 25-cv-532-TNM

DECLARATION OF CHRIS MEGERIAN

Chris Megerian, pursuant to 28 U.S.C. § 1746, declares as follows:

I submit this declaration in support of the Motion to Enforce Preliminary Injunction filed by Plaintiff The Associated Press ("the AP") in the above-captioned matter. I have personal knowledge of the facts set forth herein and would be competent to testify to them.

1. I am a White House reporter for the AP. Before joining the AP, I worked at the *Los Angeles Times* in Washington and California and *The Star-Ledger* in New Jersey.

2. On April 14, 2025, I spoke in the White House with Harrison Fields, who serves as Special Assistant to the President and Principal Deputy Press Secretary.

3. In light of the order entered in this case, I asked Mr. Fields if an AP photographer and I could join the pool for an event that was about to start in the Oval Office. Mr. Fields refused and said the White House had established a rotation.

4. I asked Mr. Fields how the AP would be included in the text wire service rotation and whether the photographer could enter the Oval Office as part of what is currently the non-rotating group of pool photographers.

5. Mr. Fields told me that because this is an ongoing legal matter, there will be no changes made to the pool at this point. I reminded Mr. Fields that the court order in this case is not stayed, and Mr. Fields responded again that it is an ongoing legal matter.

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

Executed on 4/14/2025

Signed by:
Chris Megerian
8CAFEE3CEA0A476...

Chris Megerian