

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

AMERICAN BROADCASTING
COMPANIES, INC.; THE WALT DISNEY
COMPANY; KABC TELEVISION, LLC;
KFSN TELEVISION, LLC; KGO
TELEVISION, INC.; KTRK TELEVISION,
INC.; WABC TELEVISION (NEW YORK),
LLC; WLS TELEVISION, INC.; WPVI
TELEVISION (PHILADELPHIA), LLC; and
WTVD TELEVISION, LLC,

Plaintiffs,

v.

FEDERAL COMMUNICATIONS
COMMISSION; and, in their official
capacities, BRENDAN CARR; ANNA
GOMEZ; OLIVIA TRUSTY; and JOHN
DOES 1–2,

Defendants.

Case No. 1:26-cv-02902

**UNOPPOSED MOTION OF THE REPORTERS COMMITTEE FOR FREEDOM OF
THE PRESS TO FILE A BRIEF *AMICUS CURIAE* IN SUPPORT OF PLAINTIFFS’
MOTION FOR A TEMPORARY RESTRAINING ORDER AND PRELIMINARY
INJUNCTION**

Pursuant to LCvR 7(o), the Reporters Committee for Freedom of the Press respectfully moves, through the undersigned counsel, for leave to file a brief as *amicus curiae* in support of Plaintiffs. The proposed brief is attached hereto as Exhibit 1, and a proposed order is attached as Exhibit 2. In support of this motion, *amicus* further states:

1. This Court has “broad discretion” in determining whether a third party may participate in a case as *amicus curiae*. *Nat’l Ass’n of Home Builders v. U.S. Army Corps of Engineers*, 519 F. Supp. 2d 89, 93 (D.D.C. 2007). “[N]ormally,” courts in this District will grant an *amicus* leave to file a brief “when the *amicus* has unique information or perspective that can

help the court beyond the help that the lawyers for the parties are able to provide.” *Youming Jin v. Ministry of State Sec.*, 557 F. Supp. 2d 131, 137 (D.D.C. 2008) (quoting *Ryan v. CFTC*, 125 F.3d 1062, 1063 (7th Cir. 1997)). *Amicus* can provide precisely that kind of information and perspective.

Amicus is the Reporters Committee for Freedom of the Press (the “Reporters Committee”). The Reporters Committee represents the interests of the press, who produce reporting that is indispensable to ensuring an educated populace and to preserving the rule of law. Some members of the press report on issues affecting the nation as a whole, from federal elections to Congressional activities to military actions overseas. Others report on local issues: city elections, corruption in state and local government, and more. All engage in the day-to-day reporting that helps people make informed decisions. Above all, the Reporters Committee seeks to preserve the free press, a necessity to our American democracy.

2. Plaintiffs are understandably focused on the effects of the decision of the Federal Communications Commission (“FCC” or the “Commission”) to initiate early review of the broadcast licenses of all eight ABC networks owned by ABC itself. The Reporters Committee seeks to provide the Court with a broader perspective on the threat that the Commission’s early review poses to the freedom of the press and the rule of law.

3. Consistent with LCvR 7(m), on September 15, 2026, *amicus* conferred with counsel for Plaintiffs and counsel for Defendants. Plaintiffs have consented to the filing of this brief. Defendants do not oppose the filing of this brief.

For these reasons, *amicus* respectfully requests that the Court grant its motion for leave to file a brief as *amicus curiae*.

Dated: September 17, 2026

/s/ Donald B. Verrilli, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that on September 17, 2026, I electronically filed the foregoing with the Clerk of Court using the CM / ECF system. Notice of this filing will be sent to all attorneys of record by operation of the Court's electronic filing system.

Dated: September 17, 2026

/s/ Donald B. Verrilli, Jr.

Donald B. Verrilli, Jr.