

**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.

Case No. 1:26-cv-03287-TJK

**UNOPPOSED MOTION OF THE REPORTERS COMMITTEE FOR FREEDOM OF
THE PRESS, THE WHITE HOUSE CORRESPONDENTS' ASSOCIATION, AND 49
MEDIA ORGANIZATIONS FOR LEAVE TO FILE AN AMICUS CURIAE BRIEF IN
SUPPORT OF PLAINTIFFS' MOTION FOR A TEMPORARY RESTRAINING ORDER**

Proposed amici curiae the Reporters Committee for Freedom of the Press (the “Reporters Committee”), the White House Correspondents’ Association, Advance Local Media LLC, American Broadcasting Companies, Inc., The Associated Press, The Atlantic Monthly Group LLC, Axios, Bloomberg News, Boston Globe Media Partners, LLC, CBS Broadcasting Inc., The Center for Investigative Reporting, Chicago Public Media, Inc., Conde Nast, Courthouse News Service, The Daily Beast Company LLC, Dow Jones & Company, Inc., The E.W. Scripps Company, Financial Times, Forbes Media LLC, Fox News Network, LLC, The Guardian U.S., Hearst Corporation, HuffPost, The Intercept Media, Inc., Knight First Amendment Institute at Columbia University, KQED Inc., LAist, Los Angeles Times Communications LLC, McClatchy Media Company, LLC, MediaNews Group Inc., Minnesota Public Radio, The National Press Club, National Public Radio, Inc., NBCUniversal Media, LLC, The New Republic, New York Public Radio, The New York Times Company, News/Media Alliance, Newsday LLC, Open Vallejo, Penguin Random House LLC, Pro Publica, Inc., Reuters News & Media Inc., The

Seattle Times Company, Slate, USA Today Co., Inc., Vox Media Group, LLC, WAMU, The Washington Post, WBUR, and WNET (together, “amici”) respectfully request leave to file the attached brief in support of Plaintiffs’ Motion for a Temporary Restraining Order. LCvR 7(o)(1); *see also* Fed. R. App. P. 29(a)(4).

In support of this Motion, amici state as follows:

1. Courts have “broad discretion to permit . . . participat[ion] [of] amici curiae,” and find amicus participation appropriate when amici have “relevant expertise and a stated concern for the issues at stake in [the] case.” *District of Columbia v. Potomac Elec. Power Co.*, 826 F. Supp. 2d 227, 237 (D.D.C. 2011). An amicus brief should “normally be allowed 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.” *Cobell v. Norton*, 246 F. Supp. 2d 59, 62 (D.D.C. 2003) (quoting *Ryan v. Commodity Futures Trading Comm’n*, 125 F.3d 1062, 1063 (7th Cir. 1997)); *Jin v. Ministry of State Sec.*, 557 F. Supp. 2d 131, 137 (D.D.C. 2008) (same).

2. Lead amicus the Reporters Committee is an unincorporated nonprofit association of reporters and editors founded by leading journalists and media lawyers in 1970. Today, its attorneys provide pro bono legal representation, amicus curiae support, and other legal resources to protect First Amendment freedoms and the newsgathering rights of journalists. The Reporters Committee regularly appears as amicus in this and other federal and state courts on First Amendment issues of importance to journalists. *See* Br. of Amici Curiae Reps. Comm. for Freedom of the Press & 23 Media Orgs., *N.Y. Times Co. v. Dep’t of Defense*, No. 25-04218-PLF (D.D.C Jan. 15, 2026), ECF No. 17-1; Br. of Reps. Comm. for Freedom of the Press as Amicus Curiae, *Associated Press v. Budowich*, No. 1:25-cv-00532-TNM (D.D.C. Feb. 24, 2025), ECF No. 17-1; Br. of Amici Curiae Reps. Comm. for Freedom of the Press, White House

Correspondents' Ass'n & 46 News & Media Orgs., *Associated Press v. Budowich*, No. 25-5109 (D.C. Cir. Oct. 6, 2025); Br. of Amici Curiae Reps. Comm. for Freedom of the Press & Comm. to Protect Journalists, *Radio Free Europe/Radio Liberty, Inc. v. Lake*, No. 1:25-cv-00799-RCL (D.D.C. Mar. 28, 2025), ECF No. 17-1; Br. of Amici Curiae Reps. Comm. for Freedom of the Press & Indep. NPR Member Stations, *Nat'l Pub. Radio, Inc. v. Trump*, No. 1:25-cv-01674-RDM (D.D.C. June 20, 2025), ECF No. 26-1; Br. of Amici Curiae Reps. Comm. for Freedom of the Press, Comm. to Protect Journalists, PEN Am., Press Freedom Ctr. at the Nat'l Press Club, & Soc'y of Pro. Journalists, *Widakuswara v. Lake* (and related appeals), Nos. 25-5144, 25-5145, 25-5150, 25-5151 (D.C. Cir. July 28, 2025).

3. Lead amicus the White House Correspondents' Association ("WHCA") is a nonprofit association incorporated in the District of Columbia, whose primary mission is to advocate for the newsgathering rights of the press on behalf of journalists who cover the White House and on behalf of Americans who rely on the press to provide information about the activities of their elected officials. Founded more than 100 years ago, the WHCA has consistently and effectively worked to ensure that the individuals who gather and report the news from the White House can seek answers from powerful officials, including the President of the United States. The WHCA is an independent, self-organized association of journalists who cover the White House on a full- or part-time basis. The WHCA has nearly 800 members, who together represent nearly 300 news organizations. Since the Eisenhower administration, the WHCA has coordinated logistics related to the White House press pool and briefing room. In so doing, the WHCA has, for more than a dozen presidential administrations, served as a bulwark against government influence over White House news coverage.

4. The Reporters Committee and the WHCA are joined on this brief by 49 news and media organizations: Advance Local Media LLC, American Broadcasting Companies, Inc., The Associated Press, The Atlantic Monthly Group LLC, Axios, Bloomberg News, Boston Globe Media Partners, LLC, CBS Broadcasting Inc., The Center for Investigative Reporting, Chicago Public Media, Inc., Conde Nast, Courthouse News Service, The Daily Beast Company LLC, Dow Jones & Company, Inc., The E.W. Scripps Company, Financial Times, Forbes Media LLC, Fox News Network, LLC, The Guardian U.S., Hearst Corporation, HuffPost, The Intercept Media, Inc., Knight First Amendment Institute at Columbia University, KQED Inc., LAist, Los Angeles Times Communications LLC, McClatchy Media Company, LLC, MediaNews Group Inc., Minnesota Public Radio, The National Press Club, National Public Radio, Inc., NBCUniversal Media, LLC, The New Republic, New York Public Radio, The New York Times Company, News/Media Alliance, Newsday LLC, Open Vallejo, Penguin Random House LLC, Pro Publica, Inc., Reuters News & Media Inc., The Seattle Times Company, Slate, USA Today Co., Inc., Vox Media Group, LLC, WAMU, The Washington Post, WBUR, and WNET.¹

5. Amici are uniquely positioned to provide the Court with information and insight relevant to the Court's determination of Plaintiffs' Motion for a Temporary Restraining Order. They include news outlets with White House credentials as well as organizations whose members hold such credentials. Amici know firsthand the importance of physical access by the press to government places and personnel, as well as the need for independence from undue government influence so that journalists can keep the public informed and perform their watchdog role. The proposed brief highlights the history and importance of press access to the

¹ The proposed amicus curiae brief includes complete corporate disclosures as well as an addendum containing statements of interest for each proposed amicus.

White House, and details how the President's actions violate decades of Supreme Court jurisprudence invalidating viewpoint discrimination.

6. This Motion is filed in a timely manner such that it does not unduly delay the Court's ability to rule on any pending matter. This Motion is filed the same day as the Court's scheduled hearing on Plaintiffs' Motion for a Temporary Restraining Order.

7. All parties have consented to the filing of this brief.

For the above-stated reasons, amici respectfully request that the Court grant the requested relief and accept the attached brief for filing.

Dated: September 23, 2026

Respectfully submitted,

Simon Latcovich (DC Bar No. 980319)
WILLIAMS & CONNOLLY LLP
680 Maine Avenue SW
Washington, DC 20024
Phone: 202.434.5967
Email: slatcovich@wc.com

/s/ Bruce D. Brown
Bruce D. Brown (DC Bar No. 457317)
Counsel of Record
Lisa Zycherman (DC Bar No. 495277)
Gabriel Rottman (DC Bar No. 992728)
Marietta Catsambas (DC Bar No. 1617526)
Allyson Veile (DC Bar No. 1766038)
REPORTERS COMMITTEE FOR
FREEDOM OF THE PRESS
1156 15th St. NW, Suite 1020
Washington, DC 20005
Phone: 202.795.9300
Email: bruce.brown@rcfp.org

Counsel for Proposed Amici Curiae

CERTIFICATE OF SERVICE

I hereby certify that on September 23, 2026, I electronically filed the foregoing UNOPPOSED MOTION OF THE REPORTERS COMMITTEE FOR FREEDOM OF THE PRESS, THE WHITE HOUSE CORRESPONDENTS' ASSOCIATION, AND 49 MEDIA ORGANIZATIONS FOR LEAVE TO FILE AN AMICUS CURIAE BRIEF IN SUPPORT OF PLAINTIFFS' MOTION FOR A TEMPORARY RESTRAINING ORDER with the Clerk of the U.S. District Court for the District of Columbia by using the CM/ECF system.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

Dated: September 23, 2026

Respectfully submitted,

/s/ Bruce D. Brown
Bruce D. Brown (DC Bar No. 457317)
Counsel of Record for Proposed
Amici Curiae