

**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.

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

DECLARATION OF SUDEEP REDDY

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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 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. Prior to the filing of this lawsuit, MS NOW received no written communication from the President, the White House Press Office, the Office of Communications, the Secret Service, or any other White House official purporting to give notice of the ban. 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, prior to the filing of this lawsuit, MS NOW's only communications with the White House concerning the ban were those Ms. Gardner described in her declaration. No one at the White House 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. After the producer entered the complex on the morning of September 19, 2026, MS NOW did not attempt to send any other journalist onto the White House complex that day, and it made no attempt to enter on September 20, 2026.

20. To my knowledge, no MS NOW journalist who was turned away on September 19, 2026, 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. When the ban was implemented, MS NOW's workspace, broadcast positions, cameras, and transmission equipment remained 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.

The September 22, 2026 White House Press Office Letter

22. At approximately 10:41 p.m. Eastern Time on the night of September 22, 2026, Meredith Bennett-Smith, an MS NOW digital editor based in New York, received by email a letter from the White House Press Office. Defendants filed a copy of the White House Press Office letter with their opposition to Plaintiffs' Motion for a Temporary Restraining Order as ECF No. 16-2.

23. The White House Press Office letter identifies three MS NOW articles: (1) an article by Ken Dilanian and Carol Leonnig that the White House Press Office described "reported on an alleged leak investigation that the FBI was conducting focusing on a journalist," published May 6, 2026; (2) an article by Jake Traylor that the White House Press Office described "claimed a source said that President Trump 'underestimated the willingness of Iran to resume conflict,'" published June 11, 2026; (3) an article by Steve Benen that the White House Press Office described "claimed that the Iran conflict had 'significantly depleted' the US military's munitions supply," published August 6, 2026.

24. Only one of the three articles cited in the White House Press Office letter—the June 11, 2026 article by Mr. Traylor—was written by a journalist who held a White House hard pass.

MS NOW submitted Mr. Traylor's name for renewal of his hard pass on June 18, 2026, after the June 11, 2026 date of the story cited in the letter, and his hard pass was subsequently renewed.

25. The other two articles cited in the White House Press Office letter were written by three MS NOW journalists, none of whom held a White House hard pass: Mr. Dilanian, Ms. Leonnig, and Mr. Benen. Each of them reports for MS NOW from outside the White House.

The Court's Temporary Restraining Order and the White House's Subsequent Conduct

26. At approximately 12:56 a.m. Eastern Time on September 24, 2026, the Court entered an Order granting Plaintiffs' Motion for a Temporary Restraining Order and further directing that "Defendants (except for President Trump) and their agents, representatives, and all persons or entities acting in concert with them shall immediately return, reinstate, and restore the White House 'hard pass' press credentials held by employees of CNN, MS NOW, and POLITICO that were revoked on or about September 18, 2026." ECF No. 24 at 8.

27. At approximately 2:57 a.m., MS NOW reporter Akayla Gardner submitted a request to the White House Press Office seeking guidance on how to retrieve her deactivated hard pass. She did not receive a response. She followed up again at 8:35 a.m.

28. On the morning of September 24, 2026, journalists with MS NOW went to the White House to resume their work. At approximately 7:35 a.m. Eastern Time, Emily Hung, MS NOW's White House Associate Producer, arrived at the White House. When she attempted to enter, her hard pass was seized, and she was not admitted to the complex. Nora McKee, MS NOW's Associate Field Producer, entered the White House complex at approximately the same time, and her hard pass was accepted.

29. At approximately 8:19 a.m., Laura Barrón-López, an MS NOW reporter, arrived at the White House, where a U.S. Secret Service officer informed her that her pass was “still being disabled,” or coming up as disabled, and then proceeded to confiscate her hard pass. Ms. Barrón-López attempted to enter the complex again at approximately 11:20 a.m., and a Secret Service officer at the outer security perimeter told her that her name was not in the system. Ms. Barrón-López was reissued her pass and later admitted to the complex at approximately 11:56 a.m.

30. At approximately 9:47 a.m. Eastern Time, Plaintiffs filed a Notice of Defendants’ Non-Compliance with the Temporary Restraining Order and requested an immediate hearing; a corrected version of the Notice was filed at approximately 10:02 a.m. ECF Nos. 25, 26. At approximately 10:14 a.m., the Court ordered Defendants to respond to the Notice by 12:30 p.m. that day. Minute Order (Sept. 24, 2026). Defendants responded shortly before that deadline with a declaration of a White House press operations official. ECF Nos. 27, 28. The declaration states that the badges had been reactivated by 9:07 a.m. and that confiscated badges were left at the entry gate for pickup at approximately 9:55 a.m. ECF No. 28. MS NOW journalists were denied access to the White House both before and after the Notice was filed. For example, Ms. Barrón-López was turned away at approximately 8:19 a.m., before the Notice was filed, and again at approximately 11:20 a.m., after it was filed and after the Court had ordered Defendants to file a response.

31. At approximately 11:39 a.m., Soorin Kim, an MS NOW producer, entered the White House complex. Ms. Kim’s hard pass was never seized.

32. The White House began returning hard passes to MS NOW journalists shortly before noon Eastern Time on September 24, 2026.

33. By 1:54 p.m. Eastern Time on September 24, 2026, the White House had returned the hard passes of all MS NOW personnel whose passes had been seized.

34. At approximately 3:23 p.m., after all MS NOW personnel had retrieved their confiscated hard passes, the White House Press Office responded to Akayla Gardner's request for guidance. Their response email consisted only of a link to the declaration filed by Defendants earlier in the day as ECF No. 28.

35. On September 23, 2026, the White House solicited names from news organizations for credentials to cover President Xi Jinping's arrival at the White House on September 24, 2026. MS NOW timely submitted Laura Barrón-López's name but did not receive a response. Approximately 25 minutes before the start of the event, Ms. Barrón-López was denied entry. When she asked why she was being turned away, a White House staffer told her to "talk to Steven," seemingly referring to White House Communications Director Steven Cheung.

The Harm to MS NOW

36. If the ban is permitted to go back into effect when the Temporary Restraining Order expires, MS NOW will not be able to attend press briefings, report from its broadcast positions on the grounds, attend events open to hard pass holders, and serve in the pool.

37. These losses cannot be repaired after the fact. A briefing MS NOW cannot attend is a briefing at which a MS NOW journalist cannot ask a question. An event MS NOW cannot cover is an event MS NOW cannot report on for its audience.

38. The ban also harms MS NOW in ways that cannot be measured or repaired after the fact. It deprives MS NOW of the ability to gather news firsthand at the seat of the Executive Branch.

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 28th day of September 2026 in Washington, D.C.



Sudeep Reddy