

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

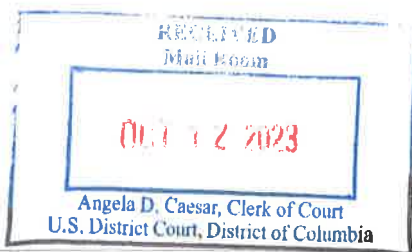
IN RE APPLICATION OF
NBCUNIVERSAL MEDIA, LLC TO
PERMIT VIDEO AND AUDIO
OF TRIAL PROCEEDINGS IN
UNITED STATES V. DONALD TRUMP

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DECLARATION OF REBECCA BLUMENSTEIN IN SUPPORT OF APPLICATION OF
NBCUNIVERSAL MEDIA, LLC TO PERMIT VIDEO AND AUDIO OF TRIAL
PROCEEDINGS IN UNITED STATES V. DONALD TRUMP

I, Rebecca Blumenstein, hereby declare under penalty of perjury the following:

1. I am the President of Editorial for NBC News. I am personally familiar with the facts set forth below and could and would testify competently thereto.
2. I have served as the President of Editorial for NBC News since January 10, 2023. In that role, I oversee NBC News editorial teams, newsgathering, field operations, booking, “Meet the Press,” “Dateline NBC,” and NBC News Studios.
3. Prior to joining NBC News, I was a Deputy Managing Editor at the *New York Times*. In that role, I led an expansion and elevation of the Business report and ensured *The Times* remained an essential destination for live coverage and breaking news.
4. I served as deputy editor, Publisher’s Office, from February 2021 to May 2022. I spearheaded a pivotal revamp of *The Times*’s policy on social media, investigations and outside projects. During the intense news year of 2020, I led the news desk and a dramatic expansion of live coverage of the pandemic, the racial reckoning and the election.
5. I began my journalism career at the *Tampa Tribune* before moving to *Gannett Newspapers* and *Newsday*, where I covered breaking news and politics. In 1995, I moved to the



Wall Street Journal, where I started in the Detroit Bureau before moving to the New York Technology Group. From 2005-2009, I served as Managing Editor of WSJ.com and China bureau chief, steering coverage of China and leading the team that won the 2007 Pulitzer Prize for international reporting for the “Naked Capitalism” series. I later served as, as among things, Deputy Editor in Chief at the *Wall Street Journal*.

6. I have received many professional recognitions for my work, including the New York Newswomen’s Award for my coverage of the aftermath of the Long Island Railroad shootings, the Gerald Loeb Award for coverage of WorldCom, and the Aspen Institute’s Henry Crown Fellowship.

7. In my professional opinion as a career journalist who has worked to cover some of the most significant events in national life over the past decades, news media organizations and the American public alike have a paramount interest in receiving a video feed of the upcoming criminal trial of former President Donald Trump.

8. One of the core missions of news media organizations is to educate the public on current events that affect our democratic institutions. Although this was not always true, Americans—along with other interested consumers of journalism throughout the world—now consume their news primarily through video coverage. There is simply no substitute for the ability of the news media to present video of this historic trial and to incorporate video in reporting and analysis of the trial.

9. Given the context and unprecedented content of this criminal trial, I also expect that tens of millions of Americans will have exceptional—perhaps unprecedented—interest in following the events of the trial, including watching key testimony, attorney argument, and rulings from the Court. Yet only a miniscule number of members of the press and ordinary

people will be present in the courtroom. Without a video feed of proceedings, there will be a critical gap in the American public's ability to access and understand the proceedings in this Court.

10. The American public also relies on audiovisual access to understand the official activities of the other branches of the federal government. Since 1977 and 1986 respectively, the House and Senate have provided audio and video broadcasts of chamber proceedings. The press also routinely televises White House events, including press briefings and presidential addresses. It would be deeply inconsistent for this historic event to go unrecorded and invisible to almost all Americans.

11. Access to a video and/or audio recording affects the type and depth of coverage that we can provide on the trial. A video recording, in particular, contains content that an audio recording, a transcript, or written notes cannot memorialize, including body language and visual reaction. As one would expect, a news program contains different content and messages when we have access to video or audio recordings (as for congressional hearings and White House press briefings), as opposed to only a transcript or a secondhand account from an in-court observer. A recent example is our coverage of the civil trial in New York court on claims that former President Trump committed fraud. *Highlights from Day 1 of the Trump New York civil trial*, NBC News (Oct. 2, 2023), <https://www.nbcnews.com/politics/donald-trump/live-blog/live-updates-trumps-new-york-fraud-trial-begins-rcna118320>.

12. At minimum, I urge this Court to allow the video recording of proceedings for historical posterity. It would be a great loss if future generations of Americans were forever deprived of being able to access and view the events of this trial even years after the verdict,

which would immeasurably improve the ability of future journalists and historians to retell accurately and meaningfully analyze this unique chapter of American history.

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

Executed on this 11th day of October 2023 in New York, New York.



Rebecca Blumenstein