

1 MICHAEL W. BIEN – 096891
VAN SWEARINGEN – 259809
2 ALEXANDER GOURSE – 321631
AMY XU – 330707
3 ROSEN BIEN
GALVAN & GRUNFELD LLP
4 101 Mission Street, Sixth Floor
San Francisco, California 94105-1738
5 Telephone: (415) 433-6830
Facsimile: (415) 433-7104
6 Email: mbien@rbgg.com
vswearingen@rbgg.com
7 agourse@rbgg.com
axu@rbgg.com

8 KELIANG (CLAY) ZHU – 305509
9 DEHENG LAW OFFICES PC
7901 Stoneridge Drive #208
10 Pleasanton, California 94588
Telephone: (925) 399-5856
11 Facsimile: (925) 397-1976
Email: czhu@dehengsv.com

12 ANGUS F. NI – Admitted *Pro Hac Vice*
13 AFN LAW PLLC
502 Second Avenue, Suite 1400
14 Seattle, Washington 98104
Telephone: (773) 543-3223
15 Email: angus@afnlegal.com

16 Attorneys for Plaintiffs

17

18 UNITED STATES DISTRICT COURT
19 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

20 U.S. WECHAT USERS ALLIANCE,
CHIHUO INC., BRENT COULTER,
21 FANGYI DUAN, JINNENG BAO,
ELAINE PENG, and XIAO ZHANG,
22 Plaintiffs,

23 v.

24 DONALD J. TRUMP, in his official
capacity as President of the United States,
25 and WILBUR ROSS, in his official
capacity as Secretary of Commerce,
26 Defendants.

27

28

THOMAS R. BURKE – 141930
DAVIS WRIGHT TREMAINE LLP
505 Montgomery Street, Suite 800
San Francisco, California 94111-6533
Telephone: (415) 276-6500
Facsimile: (415) 276-6599
Email: thomasburke@dwt.com

DAVID M. GOSSETT – Admitted *Pro Hac Vice*
DAVIS WRIGHT TREMAINE LLP
1301 K Street N.W., Suite 500 East
Washington, D.C. 20005-3366
Telephone: (202) 973-4216
Facsimile: (202) 973-4499
Email: davidgossett@dwt.com

Case No. 3:20-cv-05910-LB

**[PROPOSED] ORDER GRANTING
PLAINTIFFS’ RENEWED MOTION
FOR PRELIMINARY INJUNCTION**

Judge: Hon. Laurel Beeler
Date: September 19, 2020
Time: 1:30 p.m.
Crtrm.: Remote

Trial Date: None Set

1 On September 18, 2020, Plaintiffs filed a Renewed Motion for Preliminary
2 Injunction (Dkt. 48) seeking the below relief. Having considered all materials in the
3 record, and the arguments of counsel provided at the hearing held on September 19, 2020
4 at 1:30 p.m., the Court hereby ORDERS that:

5 1. Defendants President Donald J. Trump, in his official capacity, and Secretary
6 of Commerce, Wilbur Ross, in his official capacity, as well as their agents, servants,
7 employees, and all persons acting under their direction, are enjoined, pending final
8 judgment, from enforcing Sections 1(a) and 2(a)-(b) of Executive Order 13943 to directly
9 or indirectly prohibit or limit any use of the WeChat application in the United States or by
10 “United States persons” abroad.

11 2. Defendants President Donald J. Trump, in his official capacity, and Secretary
12 of Commerce, Wilbur Ross, in his official capacity, as well as their agents, servants,
13 employees, and all persons acting under their direction, are enjoined, pending final
14 judgment, from implementing Section 5 of Executive Order 13943 to directly or indirectly
15 prohibit or limit any use of the WeChat application in the United States or by “United
16 States persons” abroad.

17
18

19 DATED: _____, 2020

Honorable Laurel Beeler
United States Magistrate Judge

21
22
23
24
25
26
27
28