

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

META PLATFORMS, INC.,

Plaintiff,

v.

THE FEDERAL TRADE COMMISSION,

– and –

LINA M. KHAN, REBECCA KELLY  
SLAUGHTER, and ALVARO BEDOYA,  
in their official capacities as Commissioners  
of the Federal Trade Commission,

Defendants.

Case No. \_\_\_\_\_

**MOTION FOR PRELIMINARY INJUNCTION  
ENJOINING DEFENDANTS FROM PROCEEDING IN  
THE ADMINISTRATIVE PROCEEDING AGAINST PLAINTIFF**

Plaintiff Meta Platforms, Inc. (“Meta”) hereby moves the Court, pursuant to Rules 7(b) and 65 of the Federal Rules of Civil Procedure and Local Rules 7 and 65.1, to issue a preliminary injunction to enjoin Defendant Federal Trade Commission (the “FTC”) and the individual Defendants Lina M. Khan, Rebecca Kelly Slaughter, and Alvaro Bedoya (together with the FTC, the “Defendants”), together with their officers, agents, servants, employees and attorneys, from taking further action in the administrative proceeding (the “FTC Proceeding”) *In the Matter of Facebook, Inc.*, FTC File No. C-4365, against Meta, or any other action against Meta until such time as this case is fully and finally resolved. Meta’s Motion should be granted for the reasons set forth in the accompanying Memorandum of Points and Authorities.

**REQUEST FOR ORAL HEARING**

Pursuant to Local Rule 7(f), Meta hereby requests an oral hearing on its Motion for Preliminary Injunction.

**MEET AND CONFER CERTIFICATION**

Pursuant to Local Rule 7(m), undersigned counsel for Meta, on November 28, 2023, met and conferred by telephone with counsel representing Defendants about this Motion and the claims in the Complaint filed contemporaneously herewith. The Parties were unable to reach a voluntary resolution, and Defendants oppose the relief sought.

Dated: November 29, 2023

Respectfully submitted,

/s/ James P. Rouhandeh

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*Attorneys for Plaintiff Meta Platforms, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on November 29, 2023, per the Parties' agreement, copies of the foregoing Motion and the accompanying Memorandum of Points and Authorities, Exhibits, and Proposed Order were served on Defendants by email to the below listed attorneys for Defendants:

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By: /s/ James P. Rouhandeh  
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