

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA**

FREE SPEECH COALITION, INC., AYLO
PREMIUM LTD, AYLO FREESITES LTD,
WEBGROUP CZECH REPUBLIC, A.S.,
NKL ASSOCIATES, S.R.O., SONESTA
TECHNOLOGIES, S.R.O., SONESTA
MEDIA, S.R.O., YELLOW PRODUCTION,
S.R.O., PAPER STREET MEDIA, LLC,
NEPTUNE MEDIA, LLC, MEDIAME SRL,
MIDUS HOLDINGS, INC.,

Plaintiffs,

v.

TODD ROKITA, in his official capacity as the
Attorney General of the State of Indiana,

Defendant.

Case No. 1:24-cv-00980-RLY-MG

STATEWIDE RELIEF SOUGHT

PLAINTIFFS' PRELIMINARY WITNESS AND EXHIBIT LIST

Pursuant to the Case Management Plan (ECF No. 62), Plaintiffs Free Speech Coalition, Inc., Aylo Premium Ltd, Aylo Freesites Ltd, WebGroup Czech Republic, a.s., NKL Associates s.r.o., Sonesta Technologies, s.r.o., Sonesta Media, s.r.o., Yellow Production, s.r.o., Paper Street Media, LLC, Neptune Media, LLC, MediaME SRL, and Midus Holdings, Inc. (together, "Plaintiffs") submit their preliminary witness and exhibit list.

I. PRELIMINARY WITNESS LIST

1. Defendant Attorney General Todd Rokita, who can be contacted through his counsel.
2. Alison Boden, Executive Director of Plaintiff Free Speech Coalition, Inc., who can be contacted through her counsel.

3. Andreas Alkiviades Andreou, Director of Plaintiffs Aylo Freesites Ltd and Aylo Premium Ltd, who can be contacted through his counsel.
4. Robert Seifert, Director of Plaintiffs NKL Associates, s.r.o., WebGroup Czech Republic, a.s., Sonesta Media, s.r.o, and Sonesta Technologies, s.r.o., who can be contacted through his counsel.
5. Sadiq Muhamed, CEO of Plaintiffs Paper Street Media, LLC and Neptune Media, LLC, who can be contacted through his counsel.
6. Jonathan Todd, Chairman of Plaintiff Yellow Production, s.r.o., who can be contacted through his counsel.
7. Philippe Craveiro-Romao, COO of MediaME SRL and Midus Holdings, LLC, who can be contacted through his counsel.

II. PRELIMINARY EXHIBIT LIST

1. All filings by Plaintiffs or Defendant in this matter and any attachments or exhibits, including, but not limited to, the parties' briefing on Plaintiffs' Motion for Preliminary Injunction.
2. All declarations and verified documents filed or served in this case.
3. Studies, scholarship, data, and other documents related to access to sexually explicit content online, and the prevention of such access by minors, including, but not limited to, the means of age verification, content filtering, internet service provider blocking, and other alternatives.
4. Studies, scholarship, data, and other documents related to data collection, security, and privacy, including, but not limited to, consumer attitudes.

5. S.B. 17 and the legislative record regarding S.B. 17, including, but not limited to, House and Senate hearing recordings.
6. All depositions taken in this action and their exhibits.
7. All responses to interrogatories and documents produced in discovery in this action.
8. All stipulations and responses to requests for admission in this action.
9. Public reports prepared by Defendant, the state of Indiana, or a federal department or agency pertaining to S.B. 17, access to sexually explicit content online, and the prevention of such access by minors, including, but not limited to, the means of age verification, content filtering, internet service provider blocking, and other alternatives.
10. All documents noted by Defendant in their disclosures and any exhibit lists.
11. Any and all documents necessary for purposes of impeachment or rebuttal.

Defendant will be notified of any additional witnesses and documents in a timely fashion as those documents become known, as investigation and discovery are ongoing.

Dated: August 29, 2024

By /s/ Kian Hudson

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CERTIFICATE OF SERVICE

I hereby certify that on August 29, 2024 a copy of the foregoing was filed electronically. Service of this filing will be made on all ECF-registered counsel by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Kian Hudson
Kian Hudson
Attorney for Plaintiffs