

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION**

STATE OF MISSOURI *ex rel.* ERIC S.
SCHMITT, Attorney General, and

STATE OF LOUISIANA *ex rel.* JEFFREY
M. LANDRY, Attorney General,

Plaintiffs,

v.

JOSEPH R. BIDEN, JR., in his official
capacity as President of the United States, *et*
al.,

Defendants.

Case No. 3:22-cv-01213

PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Plaintiffs, the States of Missouri and Louisiana, by and through their Attorneys General, Eric S. Schmitt and Jeffrey M. Landry (collectively, “Plaintiffs” or “the States”), respectfully move this Court to grant a preliminary injunction against Defendants, prohibiting them from demanding, pressuring, urging, encouraging, or otherwise inducing social-media platforms to censor or suppress in any manner the speech of speakers, content, and viewpoint that Defendants disfavor. For the reasons stated in the States’ Memorandum in Support of Motion for Preliminary Injunction, which is filed separately and incorporated by reference herein, the Court should enter a preliminary injunction to address the grave irreparable harms and to vindicate the public interest in freedom of speech for Missouri, Louisiana, and their citizens.

For the reasons stated in the States’ Memorandum, Plaintiffs respectfully request that this Court enter a preliminary injunction in three phases:

(1) Immediately enter a preliminary injunction preventing Defendants, and their agents, officers, employees, contractors and all those acting in concert with them, from taking any steps to demand, urge, encourage, pressure, or otherwise induce any social-media company or platform for online speech, or any employee, officer, or agent of any such company or platform, to censor, suppress, remove, de-platform, suspend, shadow-ban, de-boost, restrict access to content, or take any other adverse action against any speaker, content, or viewpoint expressed on social media;

(2) Grant the States' separately filed Motion for Preliminary-Injunction-Related Discovery, and authorize the States to take discovery from Defendants and third parties to identify the details and scope of Defendants' social-media censorship activities, discussed herein; and

(3) After the conclusion of such preliminary-injunction-related discovery, enter more specific preliminary injunctive relief to provide fully effective relief to address the details and scope of the conduct challenged herein.

Dated: June 14, 2022

Respectfully submitted,

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/s/ D. John Sauer

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CERTIFICATE OF SERVICE

I hereby certify that, on June 14, 2022, I caused a true and correct copy of the foregoing to be filed with the Court's electronic filing system, to be served by operation of the Court's electronic filing system on counsel for all parties who have entered in the case. In addition, on June 14, 2022, I caused a true and correct copy of the foregoing to be sent by certified mail to all Defendants at the following addresses:

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/s/ D. John Sauer