

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE**

FREE SPEECH COALITION, INC.; DEEP)
CONNECTION TECHNOLOGIES, INC.;)
JFF PUBLICATIONS, LLC; PHE, INC.; and)
MELROSE MICHAELS,)
))
Plaintiffs,)
))
v.)
))
JONATHAN SKRMETTI, in his official)
capacity as THE ATTORNEY GENERAL)
OF TENNESSEE,)
))
Defendant.)

CASE NO.:

JUDGE:

HEARING REQUESTED

MOTION FOR PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65, Plaintiffs, through undersigned counsel, respectfully move this Honorable Court for preliminary injunctive relief pending resolution of the case on the merits.

The motion is based on the grounds that 1) the Protect Tennessee Minors Act (PTMA) violates Plaintiffs’ free speech rights as guaranteed by the First Amendment; 2) Plaintiffs are substantially likely to prevail on their claims; 3) Plaintiffs and others are substantially likely to suffer injury absent the imposition of an injunction; 4) no substantial harm to others will result from enjoining the unconstitutional law; and 5) an injunction would not be adverse to the interests of the public. Support for this motion is provided in the accompanying memorandum, the supporting declarations filed incorporated herein to the Motion of Andrea Barrica (Exhibit 1), Alison Boden (Exhibit 2), Chad Davis (Exhibit 3), Dominic Ford (Exhibit 4), and MelRose Michaels (Exhibit 5), the Complaint filed in this action, any other pleadings filed herein, and all

other matters and arguments of counsel received by this Court before and at any hearing on the Motion.

For the reasons above and set forth in the Memorandum of law filed in support of this as well as the importance of the constitutional issues involved, Plaintiff requests a hearing on this Motion for Preliminary Injunction.

Respectfully submitted,

Date: November 26, 2024

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