

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

NETCHOICE, LLC d/b/a NetChoice,)
a 501(c)(6) District of Columbia organization,)
))
and)
))
COMPUTER & COMMUNICATIONS)
INDUSTRY ASSOCIATION d/b/a CCIA, a)
501(c)(6) non-stock Virginia Corporation,)
))
Plaintiffs,)
))
v.)
))
KEN PAXTON, in his official capacity as)
Attorney General of Texas)
))
Defendant.)
_____)

Civil Action No. 1:21-cv-00840-RP

**PLAINTIFFS’ UNOPPOSED MOTION FOR LEAVE TO FILE
OVER-LENGTH MOTION FOR PRELIMINARY INJUNCTION**

Plaintiffs NetChoice and CCIA respectfully request that the Court grant Plaintiffs’ unopposed request for leave to a file a motion for preliminary injunction that exceeds the 20-page limit set by Local Rule 7(C)(2).

In the attached motion, Plaintiffs move to preliminarily enjoin enforcement of two related but distinct portions of Texas House Bill 20 (“H.B. 20”)—each with its own multiple component parts and multiple constitutional infirmities. To provide this Court with the best presentation of H.B. 20’s effects and the law’s doctrinal shortcomings, Plaintiffs respectfully request more than the pages allotted to them under the Local Rules.

Plaintiffs have made efforts to not burden this Court or Defendant with a voluminous motion: Plaintiffs do not present every legal theory they raise in their Complaint, and Plaintiffs have attempted to present streamlined arguments. Nevertheless, Plaintiffs need more than 20 pages

to present three independent reasons why H.B. 20 is unlawful and to explain H.B. 20's devastating impacts should it take effect. Granting Plaintiffs' motion will aid the Court's understanding of the issues and will not prejudice Defendant.

Plaintiffs conferred with counsel for Defendant on this request for leave, and Defendant does not oppose Plaintiffs' request for leave to file a motion for preliminary injunction that does not exceed 45 pages.

Plaintiffs file this motion now—along with the accompanying motion for preliminary injunction—to give this Court ample opportunity to consider the motions before H.B. 20 takes effect on December 2, 2021.

REQUEST FOR RELIEF

Plaintiffs respectfully request that the Court grant them leave to exceed the page limits set by Local Rule 7(C)(2) and that the clerk file and docket the attached motion for preliminary injunction. *See* Local Rule 7(B).

Dated: September 30, 2021

Respectfully submitted,

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*Motion for admission *pro hac vice* forthcoming

CERTIFICATE OF SERVICE

By agreement of counsel, I served this document and accompanying exhibits on counsel for Defendant on September 30, 2021, by email to the following addresses:

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/s/ Todd Disher
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