

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

NETCHOICE, LLC,

Plaintiff,

v.

CHRISTOPHER M. CARR, in his
official capacity as Attorney General
of the State of Georgia,

Defendant.

Case No. _____

PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65(a), Plaintiff NetChoice, LLC (“NetChoice”) respectfully moves for an order preliminarily enjoining Defendant Christopher M. Carr, in his official capacity as Attorney General of the State of Georgia, as well as all officers, agents, and employees subject to his supervision, direction, or control, from enforcing Act 564 against any of NetChoice’s members by any means, including by bringing a lawsuit under the Georgia Inform Consumers Act, O.C.G.A. §§10-1-940 through -945, as amended by Act 564, until such time as this Court has fully adjudicated the merits of the claims set forth in NetChoice’s Complaint, Dkt.1.

A preliminary injunction is warranted for the reasons set forth in the attached

memorandum of law. NetChoice respectfully asks the Court to issue the injunction before July 1, 2024, when Act 564 would otherwise go into effect.¹ Plaintiff also respectfully requests that the Court waive the posting of security contemplated by Federal Rule of Civil Procedure 65(c).

Respectfully submitted, this 6th day of June 2024.

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Counsel for Plaintiff NetChoice, LLC

¹ Pending conferral with counsel for Attorney General Carr, NetChoice anticipates filing an emergency motion seeking expedited consideration of this Motion for Preliminary Injunction.

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1D, the undersigned counsel hereby certifies that the foregoing *Plaintiff's Motion for Preliminary Injunction* complies with the font and point selections approved by the Court in Local Rule 5.1C. This document was prepared on a computer using Times New Roman font (14 point).

This 6th day of June 2024.

/s/ Adam M. Sparks
Adam M. Sparks
Counsel for Plaintiff