

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF LOUISIANA**

NETCHOICE,

Plaintiff,

v.

LIZ MURRILL, in her official capacity as
Attorney General of Louisiana;
MIKE DUPREE, in his official capacity as
Director of the Public Protection Division,
Louisiana Department of Justice,

Defendants.

Civil Action No. 3:25 -cv-00231

JUDGE JOHN W. deGRAVELLES

MAG. JUDGE SCOTT D. JOHNSON

PLAINTIFF NETCHOICE’S MOTION FOR PRELIMINARY INJUNCTION

Louisiana Senate Bill 162 (the “Act”) will unconstitutionally impede adults’ and minors’ access to vast amounts of constitutionally protected online speech. As the accompanying memorandum of law explains, the First Amendment prohibits this Act’s content-based and speaker-based regulation of protected speech. In addition, the First Amendment prohibits the Act’s requirements for covered websites to verify the ages of all their users and for minors to secure parental consent before accessing the covered websites. It also prohibits the Act’s restriction on websites’ ability to choose whether and how to publish lawful advertisements to minors. The Act will take effect July 1, 2025.

Accordingly, Plaintiff NetChoice moves this Court for an order preliminarily enjoining Defendants from enforcing the Act’s challenged provisions (La. Rev. Stat. §§ 1751-54) against NetChoice’s members **by June 17, 2025**, until this matter may be resolved on the merits. As the accompanying declarations explain, NetChoice members face immediate and irreparable harm absent an injunction—as do their users. And NetChoice respectfully requests an order 2 weeks before

the Act's July 1, 2025, effective date to allow time for potential expedited appellate review, if necessary.

Defendants received notice and a copy of this Motion (including all relevant supporting materials and the Complaint) on March 18, 2025, as detailed in the attached certification. Plaintiff concurrently submits a proposed order that would grant the requested relief.

WHEREFORE, for the reasons stated herein and in its concurrently submitted memorandum of law, Plaintiff NetChoice respectfully requests entry of a preliminary injunction prohibiting Defendants from enforcing the Act (La. Rev. Stat. §§ 1751-54) against NetChoice's members, and such other and further relief the Court deems necessary and proper.

Dated: March 18, 2025

Respectfully submitted,

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