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UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

HANNAH PAISLEY ZOULEK, a Utah resident; JESSICA CHRISTENSEN, a Utah resident; LU ANN COOPER, a Utah resident; M.C., a Utah resident, by and through her parent, LU ANN COOPER; and VAL SNOW, a Utah resident; and UTAH YOUTH ENVIRONMENTAL SOLUTIONS, a Utah association,

Plaintiffs,

v.

KATIE HASS, in her official capacity as Director of the Utah Dept of Commerce Division of Consumer Protection; SEAN REYES, in his official capacity as Utah Attorney General,

Defendants.

DECLARATION OF HANNAH PAISLEY ZOULEK IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Case No. 2:24-cv-00031-DAK-DAO

Judge Dale A. Kimball

Magistrate Judge Daphne A. Oberg

Archive of Our Own (AO3) when I was about 15 years old. My mother was aware and supportive of these choices.

6. In addition to enabling and fostering my communities and connections, I have also used Tumblr to learn about different perspectives on current events. For example, I consulted Tumblr shortly after the U.S. Supreme Court reversed the *Roe v. Wade* decision to better understand the impact of the ruling. Sometimes I will hear about a news story on Tumblr and then read about it further elsewhere online. Oftentimes, after I read a particular story or access

teammates and I used Chief Delphi to learn about updates to robotics competition rules and to troubleshoot a strange technical issue with one of our robots.

9. About two years ago, I joined the Utah Attorney General’s Youth Advisory Committee to get more involved in my community. The Attorney General’s Office informed a subset of our committee about the idea for the proposed legislation that later became the 2023 Utah Social Media Regulation Act (“Social Media Act”) and asked for our opinions. By the end of the meeting, none of the youth committee members in this subset seemed to support the idea—and some, including me, found it deeply concerning.

10. When the Attorney General’s Office asked if any of our committee members would be willing to testify in favor of the bill, we all declined. Instead, I decided to testify in opposition to the bill. On February 3, 2023, I spoke before the Utah Legislature regarding my concerns that the Social Media Act would violate my constitutional rights and those of my peers, and would have a detrimental effect on teens’ mental health by removing a critical tool for teens to speak about mental health and seek resources.

11. As a resident of the state of Utah, the Act—if allowed to take effect in October—will directly affect me and my peers. It will require me and my mother to disclose highly sensitive personal data to major technology companies just to fully access the platforms that have been critical to my development, sense of community, and identity.

12. I do not intend to disclose this highly sensitive personal data if the Act takes effect, partly because I value the anonymity that social networks afford me to fully express myself, especially as a member of the LGBTQ community, and partly because I do not want to risk the

that, if I post any content on social networks, no one will be able to see it except individuals with whom I am already connected. This limitation would destroy my ability to share my thoughts and ideas with the world. It would be particularly devastating for my creative writing and art, as I thrive off of the feedback, ideas, commentary, and inspiration of the public—most of whom would no longer be able to access my work. I also enjoy promoting the art and writing of my friends, but there would not be much point if only a small group of people could see it. Under the Act, I would even have been prevented from sharing my own testimony before the Utah Legislature on social networks to anyone other than my current connections.

13. This restriction would also prevent me from viewing content posted on social networks by any Utah minors or non-age-verified individuals to whom I'm not connected, which would prevent me from discovering or connecting with other Utah teenagers online. I would therefore be prevented from, for example, promoting a local Utah community event—such as a protest or opportunity for queer youth to gather—to these teenagers. This restriction would especially affect my experience on Tumblr, where the interface involves scrolling through and reacting to (such as “tagging” or “reblogging”) the content of largely non-connected accounts. Under the Act, not only would I be unable to see any content created by Utah minors or non-age-verified accounts, I would also be unable to react to or comment on any posts by non-connected accounts—as those dconnes—t as,-10.80 ()-20 (by)-117onnendcent e—t0 (i)a.90 (t)-2.80 (e)4.80 (d)-180 (w)h

I declare under penalty of perjury that the foregoing is true and correct.

Signed in Millcreek, Utah this 29th day of May, 2024.

A black rectangular redaction box covers the signature area. Above the box, the handwritten signature "Hannah Paisley Zoulek" is visible in light blue ink.

Hannah Paisley Zoulek