No. 25-A-1389

IN THE

Supreme Court of the United States

STUDENTS ENGAGED IN ADVANCING TEXAS, ET AL.,
Applicants,

v.

KEN PAXTON, IN HIS OFFICIAL CAPACITY AS THE TEXAS ATTORNEY GENERAL,
Respondent.

On Application to the Hon. Samuel A. Alito, Jr.,
Associate Justice of the Supreme Court of the United States and
Circuit Justice for the Fifth Circuit

REPLY BRIEF IN SUPPORT OF STUDENTS ENGAGED IN ADVANCING TEXAS ET AL.'S EMERGENCY APPLICATION FOR VACATUR OF THE FIFTH CIRCUIT'S STAY OF PRELIMINARY INJUNCTION

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INTRODUCTION

Just last week, Respondent celebrated the Fifth Circuit's reinstatement of SB 2420 because the law stops children "from accessing harmful or inappropriate content."[1] But the State does not get to decide what content is "inappropriate." In holding otherwise, the Fifth Circuit's order departs from the decisions of this Court and other federal circuits. Indeed, since this Application was filed, two judges of the Sixth Circuit concluded that another age-verification and parental consent law, this one enacted by Ohio, is content-based and subject to strict scrutiny. *NetChoice, LLC v. Yost*, --- F.4th ---, 2026 WL 1758907 (6th Cir. June 18, 2026).

Attempting to evade this conflict and insist that this case will not be worthy of certiorari, the State conjures a very different version of SB 2420 from the one actually enacted, claiming the law regulates *only* "commercial transactions." *See* Opp. 1, 12, 14–15, 17, 20–21, 25, 34. Nonsense. To screen children from accessing supposedly inappropriate material, the law requires software developers to provide a "rating *and the content that led to the assigned rating*" for each app and purchase within an app. Opp. 4 (citing Tex. Bus. & Com. Code § 121.023(a)–(b)) (emphasis added). The State repeatedly acknowledges this. Opp. 4, 5, 18, 33. Far from merely regulating commercial transactions, the Act thus compels the creation of categories of disfavored content and presumptively prevents Texas teenagers from accessing e-books, videos, music, commentary, news, live events, and more. Such a holding departs from both

[1] Press Release, *Attorney General Ken Paxton Secures Major Victory Protecting Children Online by Requiring Age Verification and Parental Approval for Minors' App Downloads* (June 1, 2026), https://perma.cc/5D9V-2DBT.

this Court's decisions and those of other courts of appeals, warranting this Court's review.

The State similarly fails to show it is likely to prevail on the merits. The challenged provisions are subject to strict, not intermediate, scrutiny. They were adopted because of concerns about "inappropriate content"; restrict access to millions of apps that convey or provide fora for the exchange of ideas, information, and all kinds of expressive media; and apply based on rules that evince the State's moral and aesthetic preferences about what types of media are worthy and appropriate. The challenged provisions fail strict or any level of scrutiny because the State has never provided any evidence to suggest existing law is insufficient to address its asserted interest or shown that the challenged provisions are narrowly tailored to further any legitimate need. The State's claim, Opp. 10, that the Fifth Circuit will likely reverse the district court's decision under *Moody v. NetChoice, LLC*, 603 U.S. 707 (2024), is also meritless. The Fifth Circuit addressed *Moody* only in a footnote, App.8a–9a n.19, and Applicants have more than satisfied *Moody*'s requirements.

Respondent offers only a cursory response on the remaining stay factors. Opp. 32–33. Applicants will suffer irreparable harm from the loss of their First Amendment freedoms, while Texas has no interest in enforcing an unconstitutional law, Opp. 33. The State does not address the interests of app developers and online publishers in reaching young audiences and of parents—who, contrary to the State's suggestion, may prefer to give blanket consent—that strongly favor reinstating the status quo ante, in which the law was not in effect.

ARGUMENT

I. The Court Is Likely To Grant Certiorari.

Texas concedes that "questions about the application of the commercial speech doctrine to laws regulating the distribution of … applications to minors" are "important." Opp. 10. That is an understatement, given the rash of laws enacted nationwide. It is also enough for an eventual grant of certiorari here. *See* Appl. 12–13 (collecting cases).

Certiorari is also likely because there is conflict among the lower courts, including a circuit split among the courts of appeals, that have addressed similar age-verification and parental consent statutes.

The State discusses but ignores the circuit split between the stay order, *Yost,* and *Computer & Communications Industry Association v. Uthmeier*, 2025 WL 3458571 (11th Cir. Nov. 25, 2025). The stay order finds that a law restricting minors' access to expressive content online regulates commercial speech subject to intermediate scrutiny. App.4a. A majority of the Sixth Circuit panel in *Yost*, by contrast, concluded that Ohio's comparable age-verification and parental consent law was a content-based regulation of non-commercial speech subject to strict scrutiny (with the third judge suggesting she agreed that the law restricted protected non-commercial speech). *See* 2026 WL 1758907, at *11–12; *id.* at *34 (Ritz, J., dissenting); *id.* at *30 (Batchelder, J., concurring). And although the Eleventh Circuit stayed a preliminary injunction of the Florida law in *Uthmeier*, it did so on the ground that the law was content-neutral and purportedly satisfied intermediate scrutiny, not that it regulated commercial speech. 2025 WL 3458571, at *4.

The State argues that the laws in *Yost* and *Uthmeier* differ because they "do[] not concern transactions in an app store but instead concern[] minors' access to social-media platforms." Opp. 11. In fact, the Ohio Attorney General made essentially the same argument as Respondent, arguing that Ohio's law "regulated only the non-expressive conduct of contracting." *Yost*, 2026 WL 1758907, at *11. *Yost* rejected the contention that the law "d[id] not implicate 'fundamental constitutional rights' at all." *Id.* (quoting *Free Speech Coal., Inc. v. Paxton*, 606 U.S. 461, 495 (2025)). In any event, the State's purported distinction only underscores the overbreadth of Texas's law, which restricts minors' access *not only* to social-media platforms, but also to e-book downloads, online newspapers, and art.

The State's argument that "further percolation is warranted," Opp. 10, is a red herring: by the time the Fifth Circuit issues a final decision on the merits, that "further percolation" will have occurred. No fewer than a dozen district courts have already addressed laws restricting access to platforms, applications, or online content absent parental consent, underscoring the salience of the questions and the need for this Court's guidance.

Finally, certiorari is likely because the Fifth Circuit's decision defies this Court's precedents. The stay order asserts that any law governing the distribution of speech through an app store receives only intermediate scrutiny. App.4a. But *Brown v. Entertainment Merchants Association* held invalid a California law restricting the "sale or rental of 'violent video games' to minors." 564 U.S. 786, 789 (2011). The Court *rejected* the argument that the law "punishes the sale or rental rather than the

'creation' or 'possession' of violent depictions," and thus should receive lesser scrutiny, because "[w]hether government regulation applies to creating, distributing, or consuming speech makes no difference." *Id.* at 792 n.1. Likewise, the entire Court in *Free Speech Coalition* treated an age-verification law as regulating non-commercial speech—even though it restricted access to "commercial websites." 606 U.S. at 465; *id.* at 516 (Kagan, J., dissenting). These cases apply this Court's established rule, reaffirmed just three years ago, that disseminating "speech for pay" and "with an expectation of compensation" does not diminish its protection. *303 Creative LLC v. Elenis*, 600 U.S. 570, 594 (2023).

So too here: The challenged provisions regulate more than those who simply "propose a commercial transaction," *Bolger v. Youngs Drug Prods. Corp.*, 463 U.S. 60, 66 (1983); they establish a rating system for and restrict fully protected expression. The State tries to distinguish these many decisions on *other* grounds—such as that they purportedly involved laws that were more clearly content-based—but has no answer to their holdings that speech like that at issue here cannot be deemed commercial. *E.g.*, Opp. 24, 29 n.7. The commercial-speech framework thus does not apply.

II. Applicants Are Likely To Succeed On The Merits.

A. The Challenged Provisions Are Subject To Strict Scrutiny.

The State fails to meaningfully counter Applicants' showing that they are likely to prevail on the merits. For the reasons just discussed, the Fifth Circuit's application of the commercial-speech doctrine is indefensible. And try as it might, the

State cannot obscure why SB 2420 was enacted and what it does. It is subject to strict scrutiny for at least four reasons.

First, SB 2420's content-based purpose mandates application of strict scrutiny. *See Free Speech Coal.*, 606 U.S. at 482; *Boos v. Barry*, 485 U.S. 312, 321 (1988). The very premise of the Act is the State's judgment that some constitutionally protected, non-obscene content is nevertheless inappropriate for or harmful to minors.

- The Senate Committee recommended an age-gating statute to "prevent [minors'] exposure to harmful materials," *Students Engaged in Advancing Texas, et al. v. Paxton* ("*SEAT*"), No. 1:25-cv-1662 (W.D. Tex. Oct. 16, 2025), Dkt. 6-9 at 29;
- The bill's author explained his aim of "protect[ing] our children from inappropriate" and "dangerous" content, *SEAT* Dkt. No. 6-7;
- Legislators discussed how to restrict access to "stuff we don't want our kids to see," H.J. of Tex., 89th Leg., R.S. 3578–83 (May 8, 2025);
- Backers touted the Act for "[c]racking down" on teens' "expos[ure]" to "inappropriate content" and "harmful material," *SEAT* Dkt. Nos. 6-6, 6-10;
- The State defended the Act before the district court as an effort to "prevent minors from accessing addictive and harmful content without parental consent," App.125a:24–25, 127a:16–22; and
- Respondent himself issued a press release following the Fifth Circuit's decision stressing the Act's design to "stop" children "from accessing harmful or inappropriate content," *supra* note 1.

The Court need not take Applicants' word for it: the Act's authors, proponents, and enforcers agree its purpose is to restrict speech based on its content.

This concern over content, not contracts, is also evident in the plain text of the law. The law restricts access not only to apps themselves, but also to in-app downloads and purchases—for example, study guides, podcasts, playlists, e-books, movies, and articles. The State's brief focuses narrowly on downloading apps from an

app store, analogizing it to "state usury laws" and to age requirements for drivers' licenses. Opp. 20–21. But the better analogy would be to a law mandating that teens get parental permission to enter a library or bookstore *and*, once inside, permission for each and every book they want to take home. The Act also mandates a content-based rating system whereby parents are told that some protected content is nonetheless inappropriate for kids of a certain age—and developers are incentivized to be overinclusive in categorizing content as inappropriate so as not to be found liable for "knowingly misrepresent[ing] an age rating" to drive sales. Tex. Bus. & Com. Code §§ 121.021(b)(1–4), 121.056(a)(2). As the State is forced to concede, the only purpose of the rating system is to pass judgments about "content" that may determine whether the child can access the content at all. Opp. 18.

The State seeks to downplay the significance of the statute's purpose by arguing that strict scrutiny applies only to laws that "'*cannot be justified* without reference to the content of the regulated speech,'" and that SB 2420 "serves purposes unrelated to the content of expression." Opp. 22 (quoting *Reed v. Town of Gilbert*, 576 U.S. 155, 164 (2015)). But SB 2420 *cannot* be justified without reference to content—indeed, the age rating underlying its access-screening regime must be accompanied by a description of the "specific content" that led to the rating. Tex. Bus. & Com. Code § 121.023(b)(2). Tellingly, the State omits the rest of *Reed*'s description of the governing standard: Laws "adopted by the government 'because of disagreement with the message [the speech] conveys' … must also satisfy strict scrutiny." 576 U.S. at 164 (quoting *Ward v. Rock Against Racism*, 491 U.S. 781, 791 (1989)). The State's

repeated references to blocking access to "dangerous," "harmful," "addictive," or "inappropriate" content leave little doubt that Texas enacted SB 2420 because of its "disagreement" with certain speech.[2]

Second, even accepting the State's made-for-litigation narrative, the challenged provisions *still* are subject to strict scrutiny. As Applicants have explained, Appl. 21, because a constitutionally impermissible basis was at least a "substantial" or "motivating factor" for enacting SB 2420, the State must show that it "would have reached the same decision" absent the constitutionally impermissible motive. *Mt. Healthy City Sch. Dist. Bd. of Educ. v. Doyle*, 429 U.S. 274, 287 (1977). The State ignores *Mt. Healthy*. It makes no effort to demonstrate that it would have passed the same law but for the constitutionally impermissible desire to shield minors from purportedly harmful or inappropriate content.

Third, the Act's exceptions for certain speakers and certain types of speech, *see* Tex. Bus. & Com. Code § 121.022(h), independently require applying strict scrutiny. The State argues that these exceptions are not content-based, but turn on the exempted app's "function" or "speaker." Opp. 27–28. But as this Court has explained, "a regulation of speech cannot escape classification as facially content based simply by swapping an obvious subject-matter distinction for a 'function or purpose' proxy

[2] The State cites *City of Renton v. Playtime Theatres, Inc.*, 475 U.S. 41, 48 (1986), for the proposition that "this Court will not strike down an otherwise constitutional statute on the basis of an alleged illicit legislative motive." Opp. 23. But that principle applies to laws addressed to "secondary effects" of speech beyond its listeners, not regulations that "aim at the suppression of free expression" because of its "direct impact … on its audience." *Boos*, 485 U.S. at 320–21 (distinguishing *Renton*).

that achieves the same result." *City of Austin v. Reagan Nat'l Advert. of Austin, LLC*, 596 U.S. 61, 74 (2022). And "laws favoring some speakers over others demand strict scrutiny when the legislature's speaker preference reflects a content preference." *Turner Broad. Sys., Inc. v. F.C.C.*, 512 U.S. 622, 658 (1994); *see also* Appl. 22. Here, the exceptions turn ultimately on the communicative content of the underlying apps, not their data privacy practices, Opp. 28 (or else all apps with such practices, not just test administrators or emergency services, would be exempt) or the identity of their developer (or all non-profit or government developers would be exempt).

Fourth, the challenged provisions' content-classification and screening mandates create a system of prior restraint. The State does not even address this doctrine, which would apply even if the challenged provisions could somehow be deemed content-neutral. Appl. 22–23.

B. The Challenged Provisions Do Not Survive Any Level Of First Amendment Scrutiny.

In any event, the challenged provisions are impermissible whatever standard applies. As the district court correctly held, SB 2420 neither "advances important governmental interests unrelated to the suppression of free speech" nor avoids "burden[ing] substantially more speech than necessary to further those interests." *Turner Broad. Sys., Inc. v. F.C.C.*, 520 U.S. 180, 189 (1997).

The State argues that "the law … empower[s] parents to control their children's upbringing by deciding which software applications their children should access and to which contractual terms their children should agree." Opp. 15. But the State's interest in "empowering" parents to bar their children's access to disfavored

expression is undeniably "related to" the suppression of free speech. There is a gulf of difference between Texas' "interest in shielding children from [*unprotected*] sexual content," *Free Speech Coal.*, 606 U.S. at 496, and its professed interest here in shielding children from *all* app-based content, protected or not.

Nor are the challenged provisions tailored to serve this purpose, since they *override* parental "control" and "deci[sionmaking]" by prohibiting parents from providing any form of blanket consent. Tex. Bus. & Com. Code § 121.026(a)(3). *See also SEAT* Dkt. No. 10 ¶¶ 4, 6–9. And while the State has the obligation to "demonstrate that the recited harms are real, not merely conjectural, and that the regulation will in fact alleviate these harms in a direct and material way," *Turner Broad.*, 512 U.S. at 664, the State has offered *no evidence*—literally, none—to show the purported "harm" resulting from a lack of a parental consent regime in app stores.

The State's second asserted interest—giving parents oversight over "contractual terms" to which their children agree—fares no better. The State again fails to explain how this interest is meaningfully served by blocking access to app stores and apps, when any website user also enters into contractual terms of service and Texas in any event already regulates *all* these contracts. Tex. Bus. & Com. Code § 541.001 *et seq*. The absence of narrow tailoring also belies the State's parental-oversight interest. The State could have drafted legislation prohibiting the enforcement of contractual terms or data sharing the State considers harmful, provided for parental oversight of contractual terms without prohibiting access to apps, or required that parents be allowed to rescind terms of service entered into by

minors. *See also* App.26a (district court noting other less speech-burdening alternatives). Instead, the State chose to bar access to vast swaths of essential communicative and expressive tools and fora.

C. The District Court's Finding Of Facial Invalidity Was Proper Under *Moody*.

Applicants explained why the two-step test from *Moody* is satisfied. Appl. 29–33. The State does not meaningfully engage these arguments, much less dispute them. Instead, it doubles down on its novel interpretation of *Moody*—faulting the district court for failing to address each of the "millions of software applications available on app stores" and to undertake a "systematic analysis" that "map[s]" the "full range of covered software applications." Opp. 16–17.

That type of granular census is not what the longstanding overbreadth standard affirmed in *Moody* requires. *Moody* stands for the proposition that a court must look not just to the unconstitutional applications of a law in deciding whether to award facial relief, but also to the constitutional ones—and compare the two to determine whether the unconstitutional applications are substantial compared to its constitutional ones. 603 U.S. at 718. *Moody* does not purport to require a mathematical accounting, especially given the relaxed standards for challenges to speech regulations, the harms from which "can be realized even without an actual prosecution." *Virginia v. Am. Booksellers Ass'n, Inc.*, 484 U.S. 383, 393 (1988).

The State's interpretation would drastically expand the government's power to suppress speech by encouraging sweeping legislation with applications that undoubtedly implicate the First Amendment's protections, yet are difficult to

quantify and thus challenge. In the State's view, for example, a government could restrict teenagers' attendance at political rallies by passing a statute requiring parental consent to attend "events," and then arguing it cannot be held facially invalid because no plaintiff could catalog the "full range of events" restricted. *Cf. Brown*, 564 U.S. at 795 n.3 (making clear such a law would be facially invalid). Affected plaintiffs would have to bring individual suits for every event. Many would no doubt stay home, whether for financial reasons or to avoid the hassle. Facial challenges play a critical role in providing "breathing room for free expression." *Moody*, 603 U.S. at 723. They cannot be so easily evaded through calculated overbreadth.

D. *CASA* Does Not Undermine The Propriety Of The District Court's Injunction.

Trump v. CASA, Inc., 606 U.S. 831 (2025) does not apply here, and even if it did, it would not be an impediment to the district court's injunction.

First, as the State does not dispute, *CASA* did not construe 42 U.S.C. § 1983, the basis for the district court's injunction here. Opp. 31. Texas argues that Section 1983 does not "expand[] the equitable authority of the courts to providing relief to non-parties." *Id*. But Section 1983 was enacted specifically to expand the reach of the federal courts to remedy state violations of federal rights through equitable injunctive relief. *See Mitchum v. Foster*, 407 U.S. 225, 226, 237–38, 242 (1972) (with Section 1983, "Congress clearly conceived that it was altering the relationship between the States and the Nation with respect to the protection of federally created rights").

Second, even applying *CASA*, the district court's injunction was no broader than necessary to provide "complete relief to each plaintiff with standing to sue." 606 U.S. at 861; *see* Opp. 31. App stores cannot practically exempt Applicants—M.F., Z.B., and SEAT and its members—from the age-verification and identification mechanism that the injunction prevents without exempting all users; nor could a narrow injunction remedy the burden on M.F.'s and Z.B.'s ability to communicate with their peers, or SEAT's ability to connect, interact, and organize with new members. As this Court made clear in *Free Speech Coalition*, age-screening "necessarily" burdens the First Amendment "right to access speech." 606 U.S. at 495. The State's proposed narrower injunction thus would not fully protect Applicants' First Amendment rights; it would merely repackage their injuries. Because a plaintiff-specific injunction would not provide Applicants complete relief, the district court's issuance of a broad preliminary injunction was proper.

III. Equity Favors The Applicants.

The Fifth Circuit's stay inflicts irreparable harm by depriving millions of Texas youth of access to fora for constitutionally protected speech, and the public interest favors vacating the Fifth Circuit's stay order during the pendency of this case.

The loss of Applicants' "First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury." *Roman Catholic Diocese v. Cuomo*, 592 U.S. 14, 19 (2020) (quoting *Elrod v. Burns*, 427 U.S. 347, 373 (1976)). "Submitting to age verification is a burden on the exercise" of one's right to access constitutionally protected speech. *Free Speech Coal.*, 606 U.S. at 483. The amicus brief of the Software & Information Industry Association (SIIA) et al., for example,

describes in vivid terms the consequences of the Act for Texas students—noting how the law will require repeated parental consent even for digital courseware assigned by teachers. *See* SIIA Br. 15.

The State cites *Maryland v. King*, 567 U.S. 1301, 1303 (2012) (Roberts, C.J., in chambers), for the proposition that states suffer irreparable harm when a statute enacted by the legislature is enjoined. Opp. 33. But Texas has no interest in enforcing an unconstitutional law. *See supra* Section II. And *King* did not involve First Amendment rights on the other side of the ledger. Where, as here, a law places millions of people at risk of losing access to information and platforms for creative expression, equity favors reinstating the injunction. *See Mahmoud v. Taylor*, 606 U.S. 522, 569 (2025) (it "is both equitable and in the public interest" to enjoin enforcement of law burdening First Amendment rights).

As to its asserted "interest in protecting children," Opp. 33, Texas already has numerous tools to do so. Texas's targeted age-verification statute for material obscene to minors, Tex. Civ. Prac. & Rem. Code § 129B.002(a); *see Free Speech Coal.*, 606 U.S. at 499; the Texas Data Privacy and Security Act, Tex. Bus. & Com. Code § 541.001 *et seq*.; the federal Children's Online Privacy Protection Act; a new law criminalizing the unlawful production or distribution of sexually explicit media, *see* Tex. Penal Code § 21.165; and longstanding criminal prohibitions on knowingly displaying "harmful" material to minors, Tex. Penal Code § 43.24, remain enforceable, empowering the government to protect minors from exploitation of their data and to prevent the

sharing of obscene content with minors online. Vacating the stay would not expose children to risk; it would simply restore the status quo ante, before the Act took effect.

Finally, the State purports to be protecting the interests of parents who, in its view, "deserve to have access to the information about the apps that their kids are downloading." Opp. 3 (quoting H.J. of Tex., 89th Leg., R.S. 3578). But the Act *interferes* with parents' ability to decide how much to supervise their children's online activity and how much independence their children should enjoy: It substitutes "what the State thinks parents *ought* to want" for parents' own judgment. *Brown*, 564 U.S. at 804. *See generally* Br. of Amicus Curiae Patriot Voices at 4–10 (explaining that "SB 2420 burdens the rights of parents to direct their children's upbringing," in contravention of "this Court's precedents"). The parties agree that parents play the "primary role … in the upbringing of their children." Opp. 33 (quoting *Wisconsin v. Yoder*, 406 U.S. 205, 232 (1972)). As the Court explained earlier this Term, "[u]nder long-established precedent, parents—not the State—have primary authority with respect to 'the upbringing and education of children.'" *Mirabelli v. Bonta*, 607 U.S. 492, 497 (2026) (quoting *Pierce v. Soc'y of Sisters*, 268 U.S. 510, 534–35 (1925)); *see also Prince v. Massachusetts*, 321 U.S. 158, 166 (1944) (emphasizing that it is not the State's role to "hinder" the "freedom" of parents to care for their children as they best see fit). Here, however, the Act abridges parents' "primary authority" to make decisions that are best for their families, provide blanket consent where appropriate, and not be compelled to provide personal information to verify their guardian status. *SEAT* Dkt. No. 10 ¶¶ 5–6, 7–10 ("The parental consent provisions of the Act

necessarily force me to alter my parenting style and make granular decisions about my son's activities that I affirmatively trust him to make."). Equity and the balance of harms support vacatur.

CONCLUSION

The Court should vacate the Fifth Circuit's interlocutory order staying the district court's injunction.

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Respectfully submitted,

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