

No. 21-51178

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***In the United States Court of Appeals for the Fifth Circuit***

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NetChoice, LLC d/b/a NetChoice, and Computer & Communications Industry Association d/b/a/ CCIA  
*Plaintiffs-Appellees,*

v.

Kenneth Paxton, in his official capacity as Attorney General of Texas, *Defendant-Appellant.*

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***AMICUS Leonid Goldstein, pro se***

**UNOPPOSED MOTION FOR LEAVE TO FILE *AMICUS CURIAE* RESPONSE IN SUPPORT OF  
APPELLANT’S MOTION TO STAY PRELIMINARY INJUNCTION PENDING APPEAL**

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Proposed *Amicus* Leonid Goldstein respectfully moves this court, pursuant to FRCP Rule 29, for leave to file the accompanying brief in support of Appellant's motion to stay the district court's preliminary injunction preventing the enforcement of Texas H.B.20 and endangering lives of millions of Texans amid the pandemic.

Amicus Leonid Goldstein is an individual, US citizen, and resident of Texas. No party's counsel authored this brief, in whole or in part. No person other than Amicus contributed money to fund preparation or submission of this brief.

Amicus has M.Sc. in Mathematics and 20+ years of technical and business experience in software development and the Internet technology industry, including social media.

Considering his expertise, familiarity with the top platforms, knowledge of their business models and history, Amicus is qualified to provide professional opinion on subjects in this lawsuit. The Platforms became so powerful and accustomed to impunity, that most people with similar knowledge as Amicus depend on the Platforms for a living, either as employees or partners, and are therefore reluctant to testify for fear of retribution.

Amicus submits this brief on behalf of self and the "silent majority" of Americans, whom Platforms deny not only a voice, but essential information. Amicus has been de-platformed, banned, and suffered other restrictions by Platforms, for reasons that have nothing in common with the pretexts alleged by their witnesses.

The Amicus is especially appalled by the Plaintiff's cynical abuse of Holocaust memory. Contrary to the original allegations and YouTube witness testimony, Platforms are quite tolerant to Holocaust denial and even incitement to genocide.

For examples, Reddit's subreddit r/Holocaust used to feature mostly Holocaust denial content.<sup>1</sup> Also, it had a subreddit r/Holohoax (sic!)<sup>2</sup>. This was in the late 2017, when it was banning Trump supporters. Other Platforms were doing business with Reddit without any remorse.

Twitter allowed an account @HolohoaxExposed<sup>3</sup> with the content matching its name from 2013 to March 2021 or later. Twitter displayed and widely disseminated Louis Farrakhan's tweet(s) comparing Jews to termites,<sup>4</sup> and confirmed this content is allowed by its policy.<sup>5</sup>

Twitter also composed the phrase "Kill all Jews" and made it a trending topic<sup>6</sup> in New York on November 2, 2018. Using my experience in software development and familiarity with Twitter operations<sup>7</sup>, I can say with certainty that Twitter employee(s) intentionally changed software code in order to compose and make this phrase trending.

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<sup>1</sup> <https://perma.cc/6GPC-D4E8>, screenshots: <https://archive.fo/Ont1Q>, <https://archive.fo/cosKT>

<sup>2</sup> <https://archive.fo/vLO55>

<sup>3</sup> <https://archive.fo/xsb5a>

<sup>4</sup> <https://archive.fo/rZVUL>

<sup>5</sup> <https://archive.fo/HZgf0>

<sup>6</sup> <https://archive.is/yjr5D>, <https://archive.is/TvuEZ>

<sup>7</sup> <https://archive.is/Vlnph>

Twitter continuously hosts and displays a large number of tweets<sup>8</sup> praising Hitler for murdering Jews<sup>9</sup>, hashtag #NeedAnotherHolocaust<sup>10</sup> and similar content.

Since 2015, Google has a partnership with Twitter, pays it for real time access to its content,<sup>11</sup> and prominently displays selected tweets in its search. Google has not publicly criticized Twitter for these policies. Google also directly contributes to Holocaust denial<sup>12</sup>.

Platforms are genuinely intolerant only to COVID-19 cures (and some science). For example, Ivermectin based treatment and prophylaxis decrease the risk of bad outcome from COVID-19 by 80%-100%. YouTube, LinkedIn, Twitter, and Facebook scrub out this information, promote anti-Ivermectin content, and deplatform physicians, scientists, and lay persons sharing truthful information about it.

These are some sample publications in the peer reviewed scientific literature, confirming effectiveness of Ivermectin for COVID-19:

- Bernigaud et al., *Ivermectin benefit: from scabies to COVID-19, an example of serendipity*, *Annals of Dermatology and Venereology*. 2020 [doi:10.1016/j.annder.2020.09.231](https://doi.org/10.1016/j.annder.2020.09.231)

**99.4% lower risk of death.**<sup>13</sup> (prophylaxis)

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<sup>8</sup> <https://archive.is/FAVix>, <https://archive.is/gCzX5>, <https://archive.is/0xrVH>, <https://archive.is/OkeRJ>, <https://archive.is/OCXV5>, <https://archive.is/eJgGw>

<sup>9</sup> <https://archive.is/atkes>

<sup>10</sup> <https://archive.is/2gvWx>, <https://archive.is/UyrsN>

<sup>11</sup> <https://archive.is/fgs3v>

<sup>12</sup> <https://perma.cc/S6NZ-KKER>

<sup>13</sup> Explained: <https://archive.is/Eo5HA>

- Shimizu et al. *Ivermectin administration is associated with lower gastrointestinal complications and greater ventilator-free days...* Journal of Infection and Chemotherapy.

2021 [doi:10.1016/j.jiac.2021.12.024](https://doi.org/10.1016/j.jiac.2021.12.024)

**99.9% lower risk of death.**<sup>14</sup> (treatment)

- Ravikirti et al., *Ivermectin as a potential treatment for mild to moderate COVID-19: A double blind randomized placebo-controlled trial.* Journal of Pharmacy & Pharmaceutical

Sciences, 2021 [doi:10.18433/jpps32105](https://doi.org/10.18433/jpps32105)

**88.7% lower risk of death.**<sup>15</sup> (treatment)

- Mahmud et al., *Ivermectin in combination with doxycycline for treating COVID-19 symptoms: a randomized trial.* Journal of International Medical Research,

2021 [doi:10.5061/dryad.qjq2bvqf6](https://doi.org/10.5061/dryad.qjq2bvqf6)

**85.7% lower risk of death.**<sup>16</sup> (treatment)

- Carvallo et al., *Study of the Efficacy and Safety of Topical Ivermectin + Iota-Carrageenan in the Prophylaxis against COVID-19 in Health Personnel,* Journal of Biomedical Research

and Clinical Investigation, 2020 [doi:10.31546/2633-8653.1007](https://doi.org/10.31546/2633-8653.1007)

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<sup>14</sup> Explained: <https://archive.is/V9EB5>

<sup>15</sup> Explained <https://archive.is/O1gNX>

<sup>16</sup> Explained: <https://archive.is/vUR31>

**99.9% lower risk of case.**<sup>17</sup> (prophylaxis)

- Shouman et al., *Use of Ivermectin as a Potential Chemoprophylaxis for COVID-19 in Egypt: A Randomised Clinical Trial*. Journal of Clinical and Diagnostic Research. 2021 [doi:10.7860/JCDR/2020/46795.0000](https://doi.org/10.7860/JCDR/2020/46795.0000)

**92.9% lower risk of severe case.**<sup>18</sup> (prophylaxis)

- Morgenstern et al. *Ivermectin as a SARS-CoV-2 Pre-Exposure Prophylaxis Method...* Cureus. 2021 [doi:10.7759/cureus.17455](https://doi.org/10.7759/cureus.17455)

**80% lower risk of hospitalization.**<sup>19</sup> (prophylaxis)

- Nardelli et al. *Crying wolf in time of Corona: the strange case of ivermectin and hydroxychloroquine. Is the fear of failure withholding potential life-saving treatment from clinical use?* Signa Vitae. 2021 <http://www.signavitae.com/articles/10.22514/sv.2021.043>

**79.5% lower risk of death.**<sup>20</sup> (meta-analysis)

The Platforms' response is to muzzle the doctors and to block the science:

- YouTube censored a video of Nobel Prize winner Dr. Satoshi Ōmura, inventor of Ivermectin<sup>21</sup>

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<sup>17</sup> Explained: <https://archive.is/khHdw>

<sup>18</sup> Explained: <https://archive.is/uVJZw>

<sup>19</sup> Explained: <https://archive.is/wip/KDb57>

<sup>20</sup> Explained: <https://archive.is/b1lZp>

<sup>21</sup> <https://archive.is/XElcM>

- Twitter blocked access to entire European Journal of Medical and Health Sciences for publishing positive study on Ivermectin<sup>22</sup>
- YouTube deletes videos of doctors testifying in Senate Homeland Committee about Ivermectin, uploaded by Senator Ron Johnson<sup>23</sup>
- LinkedIn banned<sup>24</sup> Front Line COVID-19 Critical Care (FLCCC) Alliance<sup>25</sup>, comprising some of the most prominent doctors, successfully treating COVID-19 patients
- Twitter locked out a media account for quoting a congressman Andy Briggs<sup>26</sup> mentioning Ivermectin and Hydroxychloroquine
- YouTube deleted 15 videos from Brazilian President and said “that its standards do not allow material that claims hydroxychloroquine and/or ivermectin is efficacious in curing or eradicating Covid-19.”<sup>27</sup>

*Amicus* hereby respectfully submit the attached *Amicus Brief* to aid this court in its review of the district court’s decision and in support of Appellee’s Motion for Stay. *Amicus* urges that the Court should stay the district court’s injunction immediately.

January 10, 2021

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<sup>22</sup> <https://archive.is/UJC4f>

<sup>23</sup> <https://archive.is/SCq1R>

<sup>24</sup> <https://archive.fo/Vm87J>

<sup>25</sup> <https://covid19criticalcare.com/>

<sup>26</sup> <https://archive.fo/abqWV>

<sup>27</sup> <https://archive.is/MQGxz>

Respectfully submitted,

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