

**IN THE UNITED STATES COURT OF APPEALS  
FOR THE SIXTH CIRCUIT**

<b>DO NO HARM,</b>	)	
	)	
<i>Plaintiff-Appellant,</i>	)	<b>Case No. 24-5937</b>
	)	
<b>v.</b>	)	
	)	
<b>WILLIAM LEE, in his official</b>	)	
<b>Capacity, as Governor of the</b>	)	
<b>State of Tennessee,</b>	)	
	)	
<i>Defendant-Appellee.</i>	)	

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**JOINT STATUS REPORT**

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On January 22, 2025, on motion of Defendant-Appellee, the Court issued an Order temporarily holding this case in abeyance “pending settlement negotiations.” (Doc. 20). The Order directed Defendant to “file a status report every 30 days.” *Id.* Plaintiff-Appellant has agreed to join this third status report.

In their last report, the parties noted pending legislation that would repeal some of the challenged laws. *See* H.B. 1237, 114th Gen. Assemb., Reg. Sess. (TN 2025); S.B. 1235, 114th Gen. Assemb., Reg. Sess. (TN 2025). Since then, those bills have passed in the General Assembly.

S.B. 1084 was also introduced and passed in both chambers of the General Assembly. It amends and replaces Tenn. Code Ann. § 8-1-111—the other law challenged by Plaintiff-Appellant.

In all events, the parties report that they continue to be engaged in good-faith settlement negotiations to resolve both this case and a related district-court case together.<sup>1</sup> The parties agree the stay should remain in effect because: 1) settlement negotiations remain ongoing; and 2) recently passed legislation, if signed by the Governor, will repeal or amend all the challenged laws, thus impacting potential resolution of this matter. *See* H.B. 1237, 114th Gen. Assemb., Reg. Sess. (TN 2025); S.B. 1235, 114th Gen. Assemb., Reg. Sess. (TN 2025); S.B. 1084, 114th Gen. Assemb., Reg. Sess. (TN 2025). The parties intend to come to an agreement in the coming months.

Dated: April 24, 2025

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<sup>1</sup> *See Do No Harm v. Lee*, No 3:24-cv-01334 (M.D. Tenn.).

Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

I hereby certify that on Thursday, April 24, 2025, a true and correct copy of the foregoing has been forwarded via the Court's electronic filing system to all counsel of record.

*s/ Andrew D. Denning*  
Andrew D. Denning