

**THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ASSOCIATION FOR ACCESSIBLE  
MEDICINES,

*Plaintiff,*

v.

KWAME RAOUL,  
in his official capacity as Attorney  
General of the State of Illinois,

*Defendant.*

Case No. 1:24-cv-00544

**PLAINTIFF’S MOTION FOR A PRELIMINARY INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 65(a) and the Local Rules of the Northern District of Illinois, Plaintiff, the Association for Accessible Medicines (“AAM”), on behalf of its members, hereby moves the Court for a preliminary injunction enjoining Kwame Raoul, in his official capacity as Attorney General of the State of Illinois, as well as his officers, agents, servants, employees, attorneys, and all persons in active concert or participation with him (collectively, “Defendant”), from implementing or enforcing Illinois Public Law 103-0367 (“the Illinois Law”) against AAM’s members, or their agents and licensees, based on their sales of generic drugs or biosimilars that occur outside Illinois.

This motion is based upon all the files, records, and proceedings herein, including the accompanying memorandum of law and supporting declaration, as well as any evidence that may be submitted at the hearing on the motion. As established in the accompanying memorandum of law: (1) AAM is likely to succeed on the merits; (2) AAM’s members will suffer irreparable harm if Defendant is not preliminarily enjoined from implementing or enforcing the Illinois law; (3) the

balance of hardships favor an injunction; and (4) granting the requested preliminary injunction will further the public interest.

AAM requests that the Court require no security, because Defendant will suffer no injury from the issuance of a preliminary injunction.

Dated: February 2, 2024

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Respectfully submitted,

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