

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA

Pharmaceutical Research and  
Manufacturers of America,

Plaintiff,

v.

Stuart Williams, Stacey Jassey, Mary Phipps, Andrew Behm, James Bialke, Amy Paradis, Rabih Nahas, Samantha Schirmer, and Kendra Metz, in their official capacities as members of the Minnesota Board of Pharmacy; and Nate Clark, Peter Benner, Suyapa Miranda, David Fisher, Jodi Harpstead, Phil Norrgard, Stephanie Stoffel, and Andrew Whitman, in their official capacities as members of the Board of MNsure,

Defendants.

Case No. 20-cv-1497-DSD-DTS

**PLAINTIFF PHARMACEUTICAL  
RESEARCH AND MANUFACTURERS  
OF AMERICA'S CONDITIONAL  
MOTION FOR LEAVE TO FILE  
[PROPOSED] SUPPLEMENTAL  
COMPLAINT**

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Plaintiff Pharmaceutical Research and Manufacturers of America ("Plaintiff") conditionally moves the Court pursuant to Fed. R. Civ. P. 15(d) for entry of an order granting it leave to file a supplemental complaint.

This Motion is based upon this Motion, the Memorandum of Law, all the papers and pleadings on file in this action, such other papers as may be submitted prior to or at the hearing of this Motion, and argument at the hearing.

Dated: October 1, 2020

**GREENE ESPEL PLLP**

*/s/ Kathryn N. Hibbard*

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