

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

Pharmaceutical Research and  
Manufacturers of America,

Case No. 0:20-cv-01497-DSD-DTS

Plaintiff,

v.

**DEFENDANTS' MOTION TO  
DISMISS AMENDED COMPLAINT**

Ronda Chakolis, James Bialke,  
Amy Paradis, Rabih Nahas,  
Michael Haag, Ben Maisenbach,  
John M. Zwier, Barbara Droher Kline,  
and Kendra Metz, in their official  
capacities as members of the  
Minnesota Board of Pharmacy,

Defendants.

Pursuant to Fed. R. Civ. P. 12(b)(1) and 12(b)(6), Defendants respectfully move the Court for an order dismissing all claims in Plaintiff Pharmaceutical Research and Manufacturers of America's amended complaint for lack of subject-matter jurisdiction and for failing to state a claim upon which relief can be granted.

This motion is based on a memorandum of law, affidavits, and exhibits to be filed in accordance with the Court's procedures as stated in docket numbers 106 and 144, and on all the files, records, and proceedings herein.

Dated: September 11, 2024

Respectfully submitted,

KEITH ELLISON  
Attorney General  
State of Minnesota

**s/Sarah L. Krans**

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