

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

ASSOCIATION FOR ACCESSIBLE
MEDICINES,

Plaintiff,

v.

KEITH ELLISON,
in his official capacity as Attorney
General of the State of Minnesota,

Defendant.

Case No. 23-cv-2024 (PJS/JFD)

STIPULATION

Plaintiff Association for Accessible Medicines and Defendant Keith Ellison, in his official capacity as Attorney General of the State of Minnesota, hereby jointly stipulate and agree to the entry of a declaratory judgment, a permanent injunction, and a final judgment resolving all causes of action asserted in this litigation. As a basis for their stipulation, the parties state as follows:

1. Plaintiff filed this action on July 5, 2023. ECF No. 1.
2. The Court heard the parties' cross-motions for preliminary injunction and dismissal and issued an order granting Plaintiff a preliminary injunction on December 4, 2023. ECF No. 42. The Court dismissed without prejudice Plaintiff's third and fifth causes of action. *Id.* at 24, 25.

3. The Eighth Circuit affirmed this Court's grant of Plaintiff's motion for preliminary injunction. ECF Nos. 56-58.

4. Since that time, the parties have conferred regarding further proceedings in this Court and have reached agreement as follows.

5. The parties hereby stipulate and agree to the entry of a declaratory judgment and permanent injunction, as set forth in the proposed order and final judgment submitted jointly herewith, which is predicated upon Plaintiff's first cause of action.

6. Plaintiff's second and fourth causes of action seek the same relief that Plaintiff has achieved on the first cause of action. Accordingly, the parties further stipulate and respectfully request that concurrently with entry of the permanent injunction, this Court dismiss Plaintiff's second and fourth causes of action without prejudice, as moot.

7. The parties are discussing the subject of attorney's fees and costs and have agreed to a 30-day deadline for the submission of any fee motion and/or bill of costs, if a submission to the Court proves necessary.

8. Finally, the parties hereby stipulate to the terms of the proposed final judgment submitted jointly herewith and respectfully request that this Court approve and enter the parties' proposed order and final judgment.

Respectfully submitted,

/s/ David L. Hashmall

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Dated: November 20, 2025

/s/ Nick Pladson (with permission)

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