

**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

**JOINT MOTION FOR A STAY OF DISTRICT COURT
PROCEEDINGS PENDING RESOLUTION OF PLAINTIFF'S APPEAL**

Plaintiff Association for Accessible Medicines and Defendant Kwame Raoul respectfully submit this joint motion to stay all further proceedings in this matter pending resolution of Plaintiff's appeal to the U.S. Court of Appeals for the Seventh Circuit. In support of this motion, the parties state as follows:

1. Plaintiff filed this action on January 22, 2024, and filed a First Amended Complaint on July 9, 2024. (ECF Nos. 1, 34, 35).
2. Defendant moved to dismiss the First Amended Complaint on August 23, 2024, and this Court denied that motion on December 13, 2024. (ECF Nos. 38, 46).
3. On January 3, 2025, Plaintiff moved for a preliminary injunction, which the Court denied on September 26, 2025. (ECF Nos. 51, 85).
4. On October 16, 2025, Plaintiff filed its Notice of Appeal of this Court's September 26, 2025 order. (ECF No. 88). The Seventh Circuit has docketed that appeal as No. 25-2960.

5. The parties agree that Plaintiff's appeal is likely to resolve some of the contested legal issues in dispute in this matter, and that the remaining issues before this Court are sufficiently related to the issues on appeal that litigating the appeal and the other issues simultaneously would not serve judicial efficiency.

6. The parties have filed this joint motion for a stay in good faith and not for the purpose of unduly delaying the resolution of this matter.

For these reasons, the parties respectfully request that the Court enter an Order staying further District Court proceedings in this matter pursuant to the Court's inherent authority to do so, until Plaintiff's appeal has been resolved by the Court of Appeals or until further order of this Court.

Dated: November 18, 2025

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Respectfully submitted,

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