

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

Association for Accessible Medicines,

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

Plaintiff,

vs.

STIPULATION

Keith Ellison, in his official capacity as
Attorney General of the State of Minnesota,

Defendant.

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 as follows:

1. On November 21, 2025, this Court entered an Order and Final Judgment (Doc. 63), which provided that any motion for attorney fees, nontaxable expenses, and any bill of costs shall be filed within 30 days after entry of judgment (December 22, 2025).
2. The Parties have since made progress towards a negotiated resolution of Plaintiff's request for its attorneys' fees, nontaxable expenses, and costs in this matter.
3. Plaintiff has provided Defendant with a breakdown of its attorneys' fees, expenses, and costs. Plaintiff also provided a rough estimate of the fees it would likely incur if a negotiated resolution is impossible, which it would also seek to recover from Defendant.

4. Defendant informed Plaintiff that it will need to obtain authorization and an appropriation of funding from the Minnesota Legislature to reimburse Plaintiff for its reasonable fees, expenses, and costs in this matter. Defendant also explained that the Minnesota Legislature is not currently in session and will not go back into session until noon on February 17, 2026. Defendant cannot obtain authorization or an appropriation to reimburse Plaintiff until the Minnesota Legislature acts on Defendant's request.

5. The Parties seek to avoid incurring additional fees, expenses, or costs associated with this matter, and specifically seek to avoid litigating the question of Plaintiff's requested attorneys' fees, expenses and costs unless necessary.

6. The Parties agree that Defendant's request to the Minnesota Legislature, if approved, will likely resolve Plaintiff's request for reimbursement of fees, expenses, and costs in this matter, which are the only remaining issues before the District Court.

7. The Parties have stipulated to this stay in good faith and not for the purpose of unduly delaying the resolution of this matter.

WHEREFORE, the Parties respectfully request that the Court enter an Order staying the current deadline for any motion for attorney fees and related nontaxable expenses and any bill of costs until March 20, 2026 (90 days after the existing deadline).

At such time, the Parties will provide notify this Court of the status of Defendant's request to the Minnesota Legislature and whether additional time is necessary to obtain the requested authorization and appropriation. If it appears that no progress will be made on Defendant's request to the Minnesota Legislature in the upcoming legislative session, the Parties will state that Plaintiff will file any motion for attorney fees, nontaxable expenses,

and bill of costs within 30 days of the Parties' status report, or pursuant to further order of this Court.

Dated: December 16, 2025

FELHABER LARSON

s/ David L. Hashmall

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Dated: December 16, 2025

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

Association for Accessible Medicines,

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

Plaintiff,

vs.

Keith Ellison, in his official capacity as
Attorney General of the State of Minnesota,

**[PROPOSED] ORDER GRANTING
STAY OF DEADLINE FOR ANY
MOTION FOR ATTORNEY FEES,
NONTAXABLE EXPENSES, AND
BILL OF COSTS**

Defendant.

Upon consideration of the Court's, November 21, 2025, Order and Final Judgment (ECF No. 63) and the parties' Stipulation (ECF No. 65), the Parties' request for a stay of the December 22, 2025 deadline for any motion for attorney fees, nontaxable expenses, and bill of costs is hereby **GRANTED**.

IT IS HEREBY ORDERED that:

1. The December 22, 2025 deadline for any motion for attorney fees, nontaxable expenses, and bill of costs is **STAYED** for an additional 90 days while Defendant seeks an authorization and appropriation from the Minnesota Legislature to reimburse Plaintiff for its attorneys' fees, expenses, and costs it has incurred litigating this matter.

2. Upon expiration of the new deadline, the Parties shall notify this Court of the status of Defendant's request to the Minnesota Legislature and whether additional time is necessary.

3. Alternatively, if it appears that the Defendant's request to the Minnesota Legislature is unlikely to be approved in the upcoming legislative session, the Parties will

notify this Court that Plaintiff will file any motion for its attorneys' fees, nontaxable expenses, and bill of costs within 30 days of the Parties' status report, or pursuant to further order of this Court.

LET JUDGMENT BE ENTERED ACCORDINGLY.

Dated: _____

Patrick J. Schiltz, Chief Judge
United States District Court