

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

Association for Accessible Medicines,

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

Plaintiff,

vs.

**THIRD STIPULATION
AND STATUS REPORT**

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. On December 17, 2025, the Court entered an Order staying the deadline for any motion for attorneys' fees, nontaxable expenses, and bill of costs (Doc. 67).
3. On March 18, 2026, the Court entered a further Order continuing the stay. (Doc. 70).
4. Pursuant to the Court's prior Orders, Defendant reports that efforts to secure a legislative appropriation to resolve the remaining issue in this matter have been unsuccessful.

5. In light of that development, the Parties respectfully request that the stay be lifted and that the Court set a deadline of 30 days from the date of its Order lifting the stay for Plaintiff to file any motion for attorney fees, nontaxable expenses, and bill of costs.

6. The Parties make this stipulation in good faith and not for the purpose of undue delay.

WHEREFORE, the Parties respectfully request that the Court enter an Order: (1) lifting the stay; and (2) setting a deadline of 30 days from the date of that Order for Plaintiff to file any motion for attorney fees, nontaxable expenses, and bill of costs.

Dated: April 27, 2026

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Date: April 27, 2026

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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 LIFTING STAY
AND SETTING 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), the Court's prior Orders staying the deadline for any motion for attorney fees, nontaxable expenses, and bill of costs (ECF Nos. 67, 70), and the parties' Third Stipulation (ECF No. 71), the parties' request to lift the current stay is **GRANTED**.

IT IS HEREBY ORDERED that:

1. The stay of the deadline for any motion for attorney fees, nontaxable expenses, and bill of costs is **LIFTED**.
2. Plaintiff shall file any motion for attorney fees, nontaxable expenses, and bill of costs within thirty (30) days of the date of this Order.

Dated: _____

Patrick J. Schiltz, Chief Judge
United States District Court