

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

Pharmaceutical Research and  
Manufacturers of America,

Case No. 20-CV-01497 DSD/DTS

Plaintiff,

**STIPULATION FOR STAY**

vs.

Ronda Chakolis-Hassan, et al.,

Defendants.

Counsel for the parties stipulate and jointly move this Court for an order staying all proceedings including discovery through May 18, 2026, based on the following:

1. Plaintiff Pharmaceutical Research and Manufacturers of America (“PhRMA”) filed this action in 2020 challenging the constitutionality of the Alec Smith Insulin Affordability Act, Minnesota Statutes section 151.74 (“Act”). The Court dismissed the case, and the Eighth Circuit reversed and remanded.
2. In 2024, the Minnesota legislature amended § 151.74 and enacted § 151.741. PhRMA then amended its complaint to challenge both statutes. In June 2025, the Court denied Defendants’ motion to dismiss the amended complaint and Defendants answered.
3. The parties’ attorneys have since conferred extensively, and the parties agree that legislative amendments may resolve or materially affect this matter. The parties seek time to explore these amendments and possible resolutions of this case. A stay until the regular legislative session ends on May 18, 2026, would promote economy, conserve resources, and cause no prejudice.

4. The parties will update the Court if the matter resolves before then or otherwise provide the Court with a status update no later than May 29, 2026.

**THEREFORE**, the parties, through their counsel, stipulate and move the court to:

1. Cancel the February 12, 2026 pretrial conference and stay all proceedings, including discovery, through May 18, 2026, unless the parties notify the Court by an earlier date that they have reached an impasse.

Dated: January 29, 2026

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Dated: January 29, 2026

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