

No. 25-2960

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UNITED STATES COURT OF APPEALS  
FOR THE SEVENTH CIRCUIT

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ASSOCIATION FOR ACCESSIBLE MEDICINES,

*Plaintiff-Appellant,*

v.

KWAME RAOUL,  
in his official capacity as Attorney General for the State of Illinois,

*Defendant-Appellee.*

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Appeal from the United States District Court for the Northern District of Illinois  
Case No. 1:24-cv-00544 (Kendall, C.J.)

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**UNOPPOSED SECOND MOTION OF APPELLANT  
ASSOCIATION FOR ACCESSIBLE MEDICINES FOR  
EXTENSION OF TIME TO FILE OPENING BRIEF**

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*Counsel for Plaintiff-Appellant*

Pursuant to Federal Rule of Appellate Procedure 26(b) and Seventh Circuit Rule 26, Plaintiff-Appellant Association for Accessible Medicines (“AAM”) respectfully requests an additional 31-day extension of time, to and including February 9, 2026 (a Monday), to file its opening brief. AAM’s brief is currently due January 9, 2025, and AAM has previously sought one 30-day extension. In support of this motion, AAM incorporates the attached declaration of William M. Jay.

1. This is an appeal of a decision by the United States District Court for the Northern District of Illinois denying AAM’s motion for a preliminary injunction.

2. AAM filed its Notice of Appeal on October 16, 2025, and the case was docketed on October 31, 2025. AAM’s opening brief was initially due December 10, 2025.

3. AAM filed its unopposed motion for a 30-day extension of time to file its opening brief on November 26, 2025, and the motion was granted the same day. Without a further extension, AAM’s opening brief is due January 9, 2026.

4. Good cause supports the 31-day extension requested due to Mr. Jay’s and Ms. Marin’s responsibilities in other matters between December 10, 2025 and February 9, 2026. Most significantly, Mr. Jay and Ms. Marin were responsible for an expedited preliminary-injunction hearing in the District of Connecticut on December 9, 2026. In addition, the Federal Circuit has set an expedited oral argument in a case for which Mr. Jay is responsible for Monday, January 5. Mr. Jay

is also planning to take a family vacation involving prepaid international travel from December 27, 2025, to December 31, 2025. Mr. Jay and Ms. Marin both have additional professional commitments in December and January. As required by Circuit Rule 26, these commitments are detailed with specificity in the accompanying declaration. These commitments justify the additional extension.

5. The extension requested will allow sufficient time for appellate counsel to conduct the appropriate legal research, prepare AAM's brief, and allow for AAM's review of the brief before filing. Even with due diligence and prioritization, the extension is necessary to enable counsel to file an appropriate brief, as the affidavit further explains.

6. Notice and a copy of this motion have been provided to counsel for the appellee, who consents to this request for an extension.

For these reasons, AAM respectfully requests an extension of 31 days to file its opening brief—from January 9, 2026, to February 9, 2026.

/s/ William M. Jay

William M. Jay

Isabel M. Marin

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*Counsel for Plaintiff-Appellant*

Dated: December 19, 2025

## **DECLARATION OF WILLIAM M. JAY**

I, William M. Jay, declare as follows:

1. I am a member of the Bar of this Court and an attorney in the law firm Goodwin Procter LLP.

2. I have knowledge of the facts set forth below and, if called as a witness, could and would testify to them.

3. I make this declaration as required by Seventh Circuit Rule 26, to demonstrate diligence and good cause for a 31-day extension of time to file the opening brief for Plaintiff-Appellant Association for Accessible Medicines (“AAM”).

4. This is an appeal of a September 26, 2025, decision by the United States District Court for the Northern District of Illinois that denied AAM’s motion for a preliminary injunction. I have been lead counsel for the plaintiff throughout the case and argued the preliminary-injunction motion. I am the only attorney still at my firm who worked on the district court briefing in this case. My colleague Isabel Marin joined the case before the preliminary-injunction hearing and will assist with the appeal.

5. AAM filed its Notice of Appeal on October 16, 2025, and the case was docketed on October 31, 2025. AAM’s opening brief was initially due December 10, 2025.

6. AAM filed its unopposed motion for a 30-day extension of time to file its opening brief on November 26, 2025, and the motion was granted the same day. Without a further extension, AAM's opening brief is due January 9, 2026.

7. Ms. Marin and I both have competing responsibilities as counsel of record in other matters that will require close attention in December 2025, January 2026, and early February 2026. Specifically: (1) I was lead counsel for plaintiff in *Association for Accessible Medicines v. Boughton*, No. 25-cv-1757, in the District of Connecticut. Oral argument on AAM's expedited motion for a preliminary injunction took place on December 9, 2025, after which the court ordered supplemental briefing and the parties negotiated a stipulation that resolved the case on December 16. (2) I am responsible for presenting oral argument to the Federal Circuit in an expedited case, *Insulet Corp. v. EOfFlow Co.*, No. 2025-1807, which the Federal Circuit recently scheduled for January 5, 2026. The oral argument cannot be continued. (3) Ms. Marin is the lead Goodwin associate on a Supreme Court reply brief in support of a petition for a writ of certiorari due on January 2, 2026 in *Champagne v. Collins*, No. 25-482. No extensions are possible for a reply brief at the certiorari stage. (4) I am lead counsel for respondent in *Keathley v. Buddy Ayers Construction, Inc.*, No. 25-6, in the Supreme Court. I am responsible for the merits brief currently due on January 20, 2026, with which Ms. Marin is also assisting. (5) I am responsible for a supplemental brief in the Eastern District of

Missouri, which the district court ordered on December 5, 2026, and which is due on December 19, 2026. (6) Ms. Marin is the lead associate responsible for a motion to strike currently due in California Superior Court on January 26, 2026, in *Gout v. Unison Agreement Corp*, No. CGC-25-629062. (7) Ms. Marin is presenting oral argument in *United States v. Zeledon Hernandez*, No. 24-4665, in the Fourth Circuit on January 30, 2026. It is unlikely that the Fourth Circuit would consider rescheduling a calendared oral argument. (8) In addition to having a number of family commitments around the Christmas holidays, I will be on a family vacation outside the United States, for which our travel and accommodations are prepaid, from December 27 through December 31.

8. I respectfully submit that given the foregoing commitments by both of AAM's appellate counsel, the requirements of Circuit Rule 26 for an extension based on engagement in other litigation are met.

9. Before filing this motion, I provided a copy to Carson R. Griffis, lead appellate counsel for Appellee, and notified him that AAM would be seeking a 31-day extension. Appellee consents to this request for an extension.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 19, 2025.

/s/ William M. Jay  
William M. Jay

**CERTIFICATE OF COMPLIANCE**

This motion complies with the word limit of Fed. R. App. P. 27(d)(2)(A) because, excluding the parts of the document exempted by Fed. R. App. P. 27(a)(2)(B) and Fed. R. App. P. 32(f), the motion contains 400 words. This motion complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the type-style requirements of Fed. R. App. P. 32(a)(6) because this document has been prepared in a proportionally spaced typeface using Microsoft Word Version 2509 in 14 point Times New Roman font.

/s/ William M. Jay

William M. Jay

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Dated: December 19, 2025

**CERTIFICATE OF SERVICE**

I hereby certify that on December 19, 2025, I electronically filed the foregoing UNOPPOSED SECOND MOTION OF APPELLANT ASSOCIATION FOR ACCESSIBLE MEDICINES FOR EXTENSION OF TIME TO FILE OPENING BRIEF with the Clerk of the Court for the United States Court of Appeals for the Seventh Circuit by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ William M. Jay

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