

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MAINE**

THE AMERICAN HOSPITAL  
ASSOCIATION, THE MAINE HOSPITAL  
ASSOCIATION, ST. MARY'S REGIONAL  
MEDICAL CENTER, NATHAN LITTAUER  
HOSPITAL & NURSING HOME, UNITY  
MEDICAL CENTER, and DALLAS  
COUNTY MEDICAL CENTER,

*Plaintiffs,*

v.

ROBERT F. KENNEDY, JR., Secretary of the  
U.S. Department of Health and Human  
Services, THOMAS J. ENGELS,  
Administrator, Health Resources and Services  
Administration, THE HEALTH RESOURCES  
AND SERVICES ADMINISTRATION, THE  
UNITED STATES DEPARTMENT OF  
HEALTH AND HUMAN SERVICES, and  
THE UNITED STATES OF AMERICA,

*Defendants.*

Case No. 2:25-cv-00600-JAW

**NOTICE OF INTENT TO MOVE TO INTERVENE**

Undersigned counsel for AbbVie Inc. and Pharmacyclics LLC (together, "AbbVie") hereby submit this notice of intent to move to intervene under Federal Rule of Civil Procedure 24 in the above-captioned matter. AbbVie has been accepted as a participant into the Rebate Model Pilot Program that Plaintiffs seek to enjoin in this litigation. AbbVie will file a motion to intervene and, if the motion is granted, will further oppose Plaintiffs' request for a temporary restraining order and any motion for a preliminary injunction.

In light of the accelerated timeline Plaintiffs have sought for this case, AbbVie respectfully requests that the Court permit AbbVie to participate in the telephone conference set for 11:00 a.m.

on Monday, December 8, 2025 in order to align its anticipated intervention motion with the Court's schedule in a manner efficient for the parties and the Court.

Dated: December 5, 2025

Respectfully submitted,

/s/ Jay S. Geller

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*Counsel for AbbVie Inc. and Pharmacyclics LLC*

**CERTIFICATE OF SERVICE**

I, Jay S. Geller, hereby certify that on December 5, 2025, I caused the foregoing Notice of Intent to Move to Intervene to be filed via the Court's CM/ECF electronic filing system ("CM/ECF"), which sent notice to all parties receiving notification through CM/ECF.

/s/Jay S. Geller

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