

**IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

NEW DIRECTIONS ADDICTION
RECOVERY SERVICES, *et al.*,

Petitioners,

v.

Case No. 26-1136

DONALD J. TRUMP, in his official
capacity as President of the United
States, *et al.*,

Respondents.

**AMENDED RESPONSE IN OPPOSITION TO THE MOTION OF
MEDPHARM IOWA, LLC AND TRI-MOUNTAIN PURE, LLC
FOR LEAVE TO INTERVENE IN SUPPORT OF RESPONDENTS**

Petitioners New Directions Addiction Recovery Services, *et al.* respectfully submit this response in opposition to the motion of MedPharm Iowa, LLC, d/b/a Bud & Mary's, and Tri-Mountain Pure, LLC (together, "Movants") for leave to intervene as party respondents.¹

Movants are two state-licensed marijuana businesses that seek to become full parties in these consolidated proceedings for the stated purpose of defending the Acting Attorney General's Final Order—something

¹ Petitioners file this Amended Motion to add a Certificate of Compliance, per D.C. Circuit Local Rules.

Respondents can do just fine on their own. Movants' own filing confirms that they seek the same relief as the federal government, and advance the same defense of the same Final Order. *See* Mot. at 14. And the commercial reliance Movants describe, including pending DEA registration applications, prospective relief from 26 U.S.C. § 280E, and generalized industry concerns about banking, research, and hiring, has no bearing on the questions of law the petitions exclusively present.

Because Movants identify no interest or argument that Respondents will not adequately represent, and because their asserted injuries are speculative and contingent, intervention as of right is unwarranted, and permissive intervention would only add duplicative briefing to this proceeding. To the extent Movants have a distinct perspective to offer, the appropriate vehicle is participation as *amici curiae*—the exact relief Movants request in the alternative. The Court should deny the motion to intervene and, at most, permit Movants to participate as *amici* subject to this Court's ordinary rules.

I. Background

This petition, filed on May 28, 2026, and its two consolidated cases seek review of the Acting Attorney General's April 28, 2026 Final Order

transferring FDA-approved marijuana products and marijuana subject to a qualifying state medical-marijuana license from Schedule I to Schedule III of the Controlled Substances Act, and correspondingly amending DEA permit regulations. 91 Fed. Reg. 22,714 *et seq.* (Apr. 28, 2026). Petitioners in this proceeding contend that the Final Order is *ultra vires* under 21 U.S.C. § 811(d)(1) and *NORML v. DEA*, 559 F.2d 735 (D.C. Cir. 1977); that it unlawfully creates a bifurcated, hybrid schedule; that it is arbitrary and capricious; that it was issued without the notice-and-comment rulemaking and on-the-record hearing required by law; and that it contravenes the major questions doctrine, the law's best reading, the Single Convention, and constitutional constraints. The petitions raise legal and procedural challenges to agency action, not fact-bound disputes about any individual operator's business.

On June 29, 2026, Movants (an Iowa marijuana product manufacturer and a Pennsylvania marijuana grower/dispensary) moved to intervene in support of Respondents. Movants assert that setting aside the Final Order would (1) return their operations to § 280E's tax treatment; (2) forfeit the benefit of pending DEA registration applications; (3) restore research-related burdens; (4) impair commercial relationships; and (5) impair recruiting and

retention. Every one of those asserted harms flows from marijuana's classification generally, is shared across the state-licensed industry, and is untethered to the legal questions this Court must decide. Movants concede they seek the same relief as the federal government and, in the alternative, request leave to participate as amici curiae. Mot. at 14, 16.

II. Argument

A. Movants Are Not Entitled to Intervention as of Right, Because Respondents Adequately Represent the Only Interest They Assert

Intervention of right requires the movant to show, among other things, that its interest is not adequately represented by an existing party. Fed. R. Civ. P. 24(a)(2). A movant's burden is certainly not satisfied where the proposed intervenor advances the same legal theories and arguments as an existing party and fails to identify any way in which that party fails to represent their interests in the litigation. *See Sevier v. Lowenthal*, 302 F. Supp. 3d 312, 323 (D.D.C. 2018). A proposed intervenor that has offered no argument not also pressed by an existing party has not carried even the minimal burden. *See Bldg. & Constr. Trades Dep't, AFL-CIO v. Reich*, 40 F.3d 1275, 1282 (D.C. Cir. 1994); *accord Freedom from Religion Found., Inc. v. Geithner*, 644 F.3d 836, 841 (9th Cir. 2011) (finding that "where the party and

the proposed intervenor share the same ‘ultimate objective,’ a presumption of adequacy of representation applies”).

Movants’ stated objective is to defend DOJ’s final order, and they concede they seek the same relief as the federal government. Mot. at 11, 14. The consolidated petitions present pure questions of statutory authority and procedure. Among them are:

- a. whether 21 U.S.C. § 811(d)(1) authorized the Acting Attorney General to reschedule marijuana via the Final Order outside the formal-rulemaking procedures this Court construed in *NORML v. DEA*;
- b. whether the Final Order unlawfully fails to provide adequate information to prescribe marijuana;
- c. whether the Final Order created a hybrid schedule Congress never enacted and thereby exceeds the bounds of the Acting Attorney General’s authority under 21 U.S.C. § 811(d);
- d. whether the Final Order’s issuance without the notice-and-comment and on-the-record hearing required by 5 U.S.C. § 553 and 21 U.S.C. § 811 violated the law; and

- e. whether the order violates the major questions doctrine under *West Virginia v. EPA* and the best reading of the statute under *Loper Bright Enterprises v. Raimondo*.

On each of those questions, this Court should assume Respondents (as authors, executors, and principal defenders of the Final Order) will marshal the full institutional record and related expertise to provide a reasoned explanation for their actions. *See FCC v. Prometheus Radio Project*, 592 U.S. 414, 423 (2021) (requiring agency action to “be reasonable and reasonably explained”).

Movants do not identify a single legal argument in defense of the order that Respondents are unable or unwilling to make. Their motion instead lists commercial and operational grievances—tax treatment under § 280E, pending registration applications, banking, research, and hiring—that are irrelevant to the issue in this case, namely whether Respondents acted within their statutory authority and observed required procedures .

Movants’ reliance on *Natural Resources Defense Council v. Costle*, 561 F.2d 904 (D.C. Cir. 1977), and *Fund for Animals, Inc. v. Norton*, 322 F.3d 728 (D.C. Cir. 2003), does not carry them across the line. Those cases recognize only that a shared objective with the government does not *conclusively*

establish adequacy. They do not excuse a movant from identifying *some* interest or argument the government will not advance. Here, Movants have identified none. Their generalized economic stake in Schedule III status, *see* Mot. at 13, is hardly a “unique perspective” on the lawfulness of the Final Order. It is materially indistinguishable from that of every other state-licensed operator. The Final Order will rise or fall entirely on the legal questions Respondents are fully equipped to defend.

B. Movants’ Asserted Interests Are Speculative and Contingent

Intervention of right also requires an interest “relating to the ... transaction that is the subject of the action.” Fed. R. Civ. P. 24(a)(2). Movants’ asserted interests are neither concrete nor presently held. Each Movant relies principally on this litigation’s effect on recently-filed DEA registration applications that have not been granted, which is not a legally protectable interest in the subject of this litigation. Likewise, Movants’ prospective loss of § 280E tax treatment and diffuse concerns about banking, research partnerships, insurance, and personnel are generalized consequences of marijuana’s federal classification shared by the entire industry; they are not particularized interests in the specific agency action under review.

Nor can Movants manufacture a protectable interest by casting themselves as “the object of the agency action under review.” Mot. at 14. The Final Order regulates the scheduling of a controlled substance. It does not name Movants, impose any obligation on them, or subject them to any federal requirement they must satisfy. If anything, Movants are incidental beneficiaries of a more favorable classification and recipients of a hoped-for regulatory windfall. The “object of the action” principle on which Movants rely addresses parties subject to or injured by government regulation. *Lujan v. Defs. of Wildlife*, 504 U.S. 555, 561–62 (1992) (when “the plaintiff is himself the object of the action . . . there is ordinarily little question that the action . . . has caused him injury”). It does not confer a protectable interest on parties that stand to gain from an agency’s decision to reduce regulation.

Because Movants seek the same relief as Respondents, they contend they need not establish independent Article III standing. Mot. at 14 (citing *Inst. S’holder Servs., Inc. v. SEC*, 142 F.4th 757, 764 (D.C. Cir. 2025)). That contention only underscores the point: Movants are, on their own account, redundant to the Respondents they seek to assist.

C. Permissive Intervention Should Be Denied, and Amicus Participation Is the Appropriate Alternative

Even if the Rule 24(a) requirements were debatable, the Court retains wide latitude to deny permissive intervention under Rule 24(b), and should decline to allow Movants to advance the very same arguments brought by Respondents. *See Sevier*, 302 F. Supp. 3d at 323. Time is of the essence in these proceedings. Stay motions are pending and a related agency hearing has already commenced. *See* Exhibit 1 (order setting schedule of DEA administrative hearing on Final Order). Adding party-status intervenors who duplicate Respondents' defense would multiply briefing and complicate scheduling without materially aiding the Court's resolution of the legal questions presented.

Movants request leave to participate as *amici curiae* if intervention is denied. Mot. at 16. Amicus participation fully accommodates any "unique perspective" Movants can offer while protecting the parties and the Court from cumulative advocacy. *See* D.C. Cir. R. 28(d), 29; U.S. Ct. App. D.C. Cir. Practice Handbook § IX(A)(4) (an amicus "may not repeat facts or legal arguments made and adequately elaborated upon in the parties' briefs"). Movants' contemplated contribution is properly made as an amicus and

party-status intervention would invite precisely the duplication this Court's rules are designed to prevent. If the Court is inclined to hear from Movants at all, it should grant leave to appear as *amici curiae* rather than as parties.

III. Conclusion

For the foregoing reasons, Petitioners respectfully request that the Court deny Movants' motion for leave to intervene. To the extent the Court concludes that Movants should be heard, they should be permitted to participate only as *amici curiae*, subject to this Court's rules governing the length, timing, and content of amicus briefs.

Date: July 10, 2026

Respectfully submitted,

/s/Patrick Kenneally

Patrick Kenneally

IL Bar #6286573

BURKE LAW GROUP, PLLC

205 N Michigan Avenue, Suite 810

Chicago, Illinois 60601

Telephone: (832) 987-2214

Fax: (832) 793-0045

patrick.kenneally@burkegroup.law

Connor W. Mighell

TX Bar #24110107

D.D.C. Bar ID #TX0032

BURKE LAW GROUP, PLLC

1000 Main Street, Suite 2300

Houston, Texas 77002

connor.mighell@burkegroup.law

Counsel for Petitioners
CERTIFICATE OF SERVICE

I hereby certify that, on July 10, 2026, I electronically filed the foregoing Amended Response with its attendant exhibit and this Certificate of Service with the Clerk of Court for the United States Court of Appeals for the District of Columbia by using the CM/ECF system.

/s/Patrick Kenneally
Patrick Kenneally

CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing Amended Response complies with the type-volume limitation of Federal Rule of Appellate Procedure 27(d)(2)(A), as required by Federal Rule of Appellate Procedure 32(g) and D.C. Circuit Rule 32, because, excluding the parts of the document exempted by Federal Rule of Appellate Procedure 32(f), it contains 1,688 words and therefore does not exceed 5,200 words.

I further certify that the response complies with the typeface requirements of Federal Rule of Appellate Procedure 32(a)(5) and the type-style requirements of Federal Rule of Appellate Procedure 32(a)(6), and the applicable D.C. Circuit local rules, because it has been prepared in a proportionally spaced 14-point Book Antiqua typeface, with plain roman type except for permitted italics and boldface.

/s/Patrick Kenneally

Patrick Kenneally

UNITED STATES DEPARTMENT OF JUSTICE**Drug Enforcement Administration**

In the Matter of

**Schedules of Controlled Substances:
Proposed Rescheduling of Marijuana****DEA Docket No. 1362
Hearing Docket No. 26-96****ORDER SETTING SCHEDULE FOR HEARING PROCEEDINGS**

Pursuant to the Preliminary Order issued by this tribunal on June 18, 2026, the Designated Parties have timely submitted their availability for the hearing window. This tribunal has given due consideration to each Designated Party's availability and has concluded that the following schedule will be best suited. Accordingly, it is herein **ORDERED** that the Designated Parties are assigned to begin their respective cases-in-chief as follows:

Dates Assigned to Begin Case-in-Chief	
The Government	June 29, 2026
National Drug & Alcohol Screening Association (NDASA)	July 2, 2026
Smart Approaches to Marijuana (SAM)	July 6, 2026
DUID Victim Voices'	July 7, 2026
Kenneth Finn, M.D.	July 8, 2026
Tennessee Bureau of Investigation (TBI)	July 10, 2026
Phillip A. Drum, PharmD	July 13, 2026
States of Nebraska, Idaho, Indiana, and Louisiana (The States)	July 14, 2026

It is further **ORDERED** that the following detailed schedule shall control for the hearing¹:

Detailed Schedule of the Hearing	
Day 1: June 29, 2026	
9:00 A.M. ²	Chief ALJ Opening Statement
9:30 A.M.	Government Opening Statement
9:45 A.M.	Government's First Witness: Direct Examination
10:30 A.M. ³	Comfort Break
10:45 A.M.	Cont. Government's First Witness: Direct Examination
12:00 P.M.	Lunch Break
1:00 P.M.	Government's First Witness: Cross Examination Opportunity by NDASA
2:00 P.M.	Government's First Witness: Cross Examination Opportunity by TBI
3:00 P.M.	Comfort Break
3:15 P.M.	Government's First Witness: Cross Examination Opportunity by DUID Victim Voices
4:15 P.M.	Government's First Witness: Cross Examination Opportunity by The States
5:00 P.M.	END OF DAY 1
Day 2: June 30, 2026	
9:00 A.M.	Cont. Government's First Witness: Cross Examination Opportunity by The States
9:15 A.M.	Government's First Witness: Cross Examination Opportunity by SAM
10:15 A.M.	Comfort Break
10:30 A.M.	Government's First Witness: Cross Examination Opportunity by Dr. Kenneth Finn

¹ While this schedule is meant to serve as a detailed guide for the hearing, parties may conclude examinations early or forgo cross or redirect examinations. To the extent that a party concludes with its examination prior to the end of their scheduled time or forgoes examination, the hearing will proceed ahead of schedule to the next item for that day—provided that a Designated Party will not be required to begin its case-in-chief on a different date than the one assigned above. The ALJ will make other scheduling advancement determinations on a day-to-day basis as needed.

² All times are given in Eastern Time, unless otherwise noted.

³ The ALJ reserves the right to modify the timing of a comfort break to accommodate the flow of examination occurring during that scheduled break time.

11:30 A.M.	Government's First Witness: Cross Examination Opportunity by Dr. Phillip A. Drum
12:00 P.M.	Lunch Break
1:00 P.M.	Cont. Government's First Witness: Cross Examination Opportunity by Dr. Phillip A. Drum
1:30 P.M.	Government's First Witness: Redirect Examination Opportunity
2:30 P.M.	Comfort Break
2:45 P.M.	Government's Second Witness: Direct Examination
4:45 P.M.	END OF DAY 2
Day 3: July 1, 2026	
9:00 A.M.	Government's Second Witness: Cross Examination Opportunity by NDASA
10:00 A.M.	Government's Second Witness: Cross Examination Opportunity by TBI
10:30 A.M.	Comfort Break
10:45 A.M.	Cont. Government's Second Witness: Cross Examination Opportunity by TBI
11:15 A.M.	Government's Second Witness: Cross Examination Opportunity by DUID Victim Voices
12:00 P.M.	Lunch Break
1:00 P.M.	Cont. Government's Second Witness: Cross Examination Opportunity by DUID Victim Voices
1:15 P.M.	Government's Second Witness: Cross Examination Opportunity by The States
2:15 P.M.	Comfort Break
2:30 P.M.	Government's Second Witness: Cross Examination Opportunity by SAM
3:30 P.M.	Government's Second Witness: Cross Examination Opportunity by Dr. Kenneth Finn

4:30 P.M.	Government's Second Witness: Cross Examination Opportunity by Dr. Phillip A. Drum
5:00 P.M.	END OF DAY 3
Day 4: July 2, 2026	
9:00 A.M.	Cont. Government's Second Witness: Cross Examination Opportunity by Dr. Phillip A. Drum
9:30 A.M.	Government's Second Witness: Redirect Examination Opportunity
10:30 A.M.	Comfort Break
10:45 A.M.	NDASA's Opening Statement
11:00 A.M.	NDASA's First Witness: Direct Examination
12:00 P.M.	Lunch Break
1:00 P.M.	Cont. NDASA's First Witness: Direct Examination
2:00 P.M.	NDASA's First Witness: Cross Examination Opportunity by Government
3:00 P.M.	Comfort Break
3:15 P.M.	NDASA's First Witness: Redirect Examination Opportunity
4:15 P.M.	NDASA's Second Witness: Direct Examination
5:00 P.M.	END OF DAY 4
July 3, 2026	HEARING IN RECESS
Day 5: July 6, 2026	
9:00 A.M.	Cont. NDASA's Second Witness: Direct Examination
10:15 A.M.	Comfort Break
10:30 A.M.	NDASA's Second Witness: Cross Examination Opportunity by Government
11:30 A.M.	NDASA's Second Witness: Redirect Examination Opportunity
12:00 P.M.	Lunch Break
1:00 P.M.	Cont. NDASA's Second Witness: Redirect Examination Opportunity
1:30 P.M.	SAM's Opening Statement
1:45 P.M.	SAM's First Witness: Direct Examination
3:45 P.M.	Comfort Break

4:00 P.M.	SAM's First Witness: Cross Examination Opportunity by Government
5:00 P.M.	END OF DAY 5
Day 6: July 7, 2026	
9:00 A.M.	SAM's First Witness: Redirect Examination Opportunity
10:00 A.M.	Comfort Break
10:15 A.M.	SAM's Second Witness: Direct Examination
12:00 P.M.	Lunch Break
1:00 P.M.	Cont. SAM's Second Witness: Direct Examination
1:15 P.M.	SAM's Second Witness: Cross Examination Opportunity by Government
2:15 P.M.	SAM's Second Witness: Redirect Examination Opportunity
2:45 P.M.	Comfort Break
3:00 P.M.	Cont. SAM's Second Witness: Redirect Examination Opportunity
3:30 P.M.	DUID Victim Voices' Opening Statement
3:45 P.M.	DUID Victim Voices' Witness: Direct Examination
5:00 P.M.	END OF DAY 6
Day 7: July 8, 2026	
9:00 A.M.	Cont. DUID Victim Voices' Witness: Direct Examination
10:30 A.M.	Comfort Break
10:45 A.M.	Cont. DUID Victim Voices' Witness: Direct Examination
12:00 P.M.	Lunch Break
1:00 P.M.	DUID Victim Voices' Witness: Cross Examination Opportunity by Government
2:00 P.M.	DUID Victim Voices' Witness: Redirect Examination Opportunity
3:00 P.M.	Comfort Break
3:15 P.M.	Dr. Kenneth Finn's Opening Statement
3:30 P.M.	Dr. Kenneth Finn's First Witness: Direct Examination
5:00 P.M.	END OF DAY 7
Day 8: July 9, 2026	
9:00 A.M.	Cont. Dr. Kenneth Finn's First Witness: Direct Examination

9:30 A.M.	Dr. Kenneth Finn's First Witness: Cross Examination Opportunity by Government
10:30 A.M.	Comfort Break
10:45 A.M.	Dr. Kenneth Finn's First Witness: Redirect Examination Opportunity
11:45 A.M.	Dr. Kenneth Finn's Second Witness: Direct Examination
12:00 P.M.	Lunch Break
1:00 P.M.	Cont. Dr. Kenneth Finn's Second Witness: Direct Examination
2:45 P.M.	Comfort Break
3:00 P.M.	Dr. Kenneth Finn's Second Witness: Cross Examination Opportunity by Government
4:00 P.M.	Dr. Kenneth Finn's Second Witness: Redirect Examination Opportunity
5:00 P.M.	END OF DAY 8
Day 9: July 10, 2026	
9:00 A.M.	TBI's Opening Statement
9:15 A.M.	TBI's First Witness: Direct Examination
10:15 A.M.	Comfort Break
10:30 A.M.	Cont. TBI's First Witness: Direct Examination
11:30 A.M.	TBI's First Witness: Cross Examination Opportunity by Government
12:00 P.M.	Lunch Break
1:00 P.M.	Cont. TBI's First Witness: Cross Examination Opportunity by Government
1:30 P.M.	TBI's First Witness: Redirect Examination Opportunity
2:30 P.M.	Comfort Break
2:45 P.M.	TBI's Second Witness: Direct Examination
4:45 P.M.	END OF DAY 9
Day 10: July 13, 2026	
9:00 A.M.	TBI's Second Witness: Cross Examination Opportunity by Government
10:00 A.M.	Comfort Break

10:15 A.M.	TBI's Second Witness: Redirect Examination Opportunity
11:15 A.M.	Dr. Phillip A. Drum's Opening Statement
11:30 A.M.	Dr. Phillip A. Drum's First Witness: Direct Examination
12:00 P.M.	Lunch Break
1:00 P.M.	Cont. Dr. Phillip A. Drum's First Witness: Direct Examination
2:30 P.M.	Comfort Break
2:45 P.M.	Dr. Phillip A. Drum's First Witness: Cross Examination Opportunity by Government
3:45 P.M.	Dr. Phillip A. Drum's First Witness: Redirect Examination Opportunity
4:45 P.M.	END OF DAY 10
Day 11: July 14, 2026	
9:00 A.M.	Dr. Phillip A. Drum's Second Witness: Direct Examination
10:30 A.M.	Comfort Break
10:45 A.M.	Cont. Dr. Phillip A. Drum's Second Witness: Direct Examination
11:15 A.M.	Dr. Phillip A. Drum's Second Witness: Cross Examination Opportunity by Government
12:00 P.M.	Lunch Break
1:00 P.M.	Cont. Dr. Phillip A. Drum's Second Witness: Cross Examination Opportunity by Government
1:15 P.M.	Dr. Phillip A. Drum's Second Witness: Redirect Examination Opportunity
2:15 P.M.	Comfort Break
2:30 P.M.	The States' Opening Statement
2:45 P.M.	The States' First Witness: Direct Examination
4:45 P.M.	END OF DAY 11
Day 12: July 15, 2026	
9:00 A.M.	The States' First Witness: Cross Examination Opportunity by Government
10:00 A.M.	Comfort Break

10:15 A.M.	The States' First Witness: Redirect Examination Opportunity
11:15 A.M.	The States' Second Witness: Direct Examination
12:00 P.M.	Lunch Break
1:00 P.M.	Cont. The States' Second Witness: Direct Examination
2:15 P.M.	The States' Second Witness: Cross Examination by Opportunity Government
3:15 P.M.	Comfort Break
3:30 P.M.	The States' Second Witness: Redirect Examination Opportunity
4:30 P.M.	Chief ALJ Closing Statement
5:00 P.M.	END OF DAY 12
END OF SCHEDULE	

Dated: June 24, 2026

DEREK JULIUS Digitally signed by DEREK JULIUS
Date: 2026.06.24 13:30:50 -04'00'

DEREK C. JULIUS
Chief Administrative Law Judge

CERTIFICATE OF SERVICE

This is to certify that the undersigned, on June 24, 2026, caused a copy of the foregoing ORDER SETTING SCHEDULE FOR HEARING PROCEEDINGS to be delivered to the following parties:

- (1) The Government, via email to
 - i. The DEA Government Mailbox at dea.registration.litigation@dea.gov;
 - ii. James J. Schwartz, Esq., at James.J.Schwartz@dea.gov;
 - iii. Jarrett T. Lonich, Esq., at Jarrett.T.Lonich@dea.gov;
 - iv. Alexis B. Attanasio, Esq., at Alexis.B.Attanasio@dea.gov;
 - v. Kayla L. Kreinheder, Esq., at Kayla.L.Kreinheder@dea.gov;
 - vi. David C. Maley, Esq., at David.C.Maley@dea.gov;
 - vii. Lisa K. Man, Esq., at Lisa.K.Man@dea.gov;
 - viii. Stacy M. Race, Esq., at Stacy.M.Race@dea.gov;
 - ix. Mack J. Swan, Esq., at Mack.J.Swan@dea.gov;
- (2) National Drug & Alcohol Screening Association, via email to
 - i. M. Jo McGuire at jomcguire@ndasa.com;
 - ii. David G. Evans, Esq., at thinkon908@aol.com;
- (3) Tennessee Bureau of Investigation, via email to
 - i. Jacob Durst, Esq., at jacob.durst@ag.tn.gov;
 - ii. Reed N. Smith, Esq., at Reed.Smith@ag.tn.gov;
- (4) Smart Approaches to Marijuana, via email to
 - i. Patrick F. Philbin, Esq., at pphilbin@torridonlaw.com;
 - ii. John M. McNichols, Esq., at jmcnichols@torridonlaw.com;
 - iii. Chase T. Harrington, Esq., at charrington@torridonlaw.com;
- (5) The States of Nebraska, Idaho, Indiana, and Louisiana, via email to
 - i. Zachary Pohlman, Esq., at zachary.pohlman@nebraska.gov;
 - ii. Michael Zarian, Esq., at Michael.Zarian@ag.idaho.gov;
 - iii. Blake Lanning, Esq., at Blake.Lanning@atg.in.gov;
 - iv. Zachary Faircloth, Esq., at FairclothZ@ag.louisiana.gov;
- (6) DUID Victim Voices, via email to
 - i. Ed Wood, at edwood27@icloud.com;
 - ii. Patrick D. Kenneally, Esq., at patrick.kenneally@burkegroup.law;
 - iii. Connor W. Mighell, Esq., at connor.mighell@burkegroup.law;
 - iv. David G. Evans, Esq., at thinkon908@aol.com
- (7) Kenneth Finn, M.D., via email to
 - i. Patrick D. Kenneally, Esq., at patrick.kenneally@burkegroup.law;
 - ii. Connor W. Mighell, Esq., at connor.mighell@burkegroup.law;
 - iii. David G. Evans, Esq., at thinkon908@aol.com

(8) Phillip A. Drum, PharmD, *pro se*, via email at phillipdrum@comcast.net

TAYONNA
EUBANKS
(Affiliate)

Digitally signed by TAYONNA
EUBANKS (Affiliate)
Date: 2026.06.24 15:12:01
-04'00'

Tayonna Eubanks
Secretary (CTR)
Office of Administrative Law Judges