

BRENNA BIRD  
ATTORNEY GENERAL

STEVEN BLANKINSHIP  
CHIEF DEPUTY ATTORNEY GENERAL



IOWA DEPARTMENT OF JUSTICE  
OFFICE OF THE ATTORNEY GENERAL

1305 E. WALNUT ST.  
DES MOINES, IA 50319  
Main: 515-281-5164 O Direct: 515-954-9564  
Email: [steven.blankinship@ag.iowa.gov](mailto:steven.blankinship@ag.iowa.gov)  
[www.iowaattorneygeneral.gov](http://www.iowaattorneygeneral.gov)

October 30, 2025

Kristi Onstot  
Executive Secretary  
Executive Council  
State Capitol  
LOCAL

**Re: Retention of Special Counsel**

Dear Ms. Onstot:

Our office requests authorization under Iowa Code section 13.7 to retain the law firm of Barbour Hurst (who will partner with Liston & Deas PLLC), as special counsel. Special counsel will provide legal services and representation to Iowa with respect to an investigation into and possible litigation of certain business practices of several major pharmaceutical companies and pharmacy benefit managers (collectively, the “Insulin Targets”) regarding the provision and pricing of insulin products. The investigation and possible litigation will involve the companies’ potential negligent, unfair, deceptive, conspiratorial, unjust enrichment, or otherwise unlawful behavior related to the selling and pricing of insulin products. We also recommend under Iowa Code section 23B that the firm be retained on a contingent-fee basis.

The Attorney General has determined that it is necessary and appropriate to retain private special counsel to assist her office in the investigation of and potential litigation against the Insulin Targets for these reasons:

- The investigation and potential litigation will involve complex claims that have not been litigated to judgment in any court.
- Extensive resources will be required, as any potential litigation will be time- and labor-intensive.
- Potential litigation may include, but is not limited to extensive motion practice, including on complex antitrust questions and other issues of first impression; extensive, time-consuming

discovery of multiple corporate entities, including numerous depositions, and potentially extensive motion practice to ensure compliance with the state's discovery requests; identifying experts and then potential expert reports, responses, and discovery.

- The anticipated complexity of any cases arising from these investigations requires counsel with a full range of trial- and appellate-level experience litigating complex matters involving both state and federal law.

We recommend Barbour Hurst because of its historical experience investigating and litigating this matter in conjunction with Liston & Deas PLLC on behalf of other state attorney general offices. Additionally, Liston & Deas PLLC has been named co-lead counsel in multi-district litigation where any potential litigation in this matter will likely occur. This representation by Barbour Hurst in conjunction with Liston & Deas PLLC will best position Iowa in any investigation and potential litigation.

Our office has determined that this proposed contingent representation is both cost effective and in the public interest. And we have determined that a procurement process is not feasible under these unique circumstances. We therefore recommend approval of the law firm Barbour Hurst, as special counsel. The engagement will be governed by a separate contingent fee agreement under Iowa Code section 23B.3.

Yours truly,

A handwritten signature in black ink, appearing to read "S. Blankinship", with a stylized, flowing script.

Steven Blankinship  
Chief Deputy Attorney General