

SUPREME COURT OF THE UNITED STATES

DELAWARE, *Plaintiff,*

v.

Docket Nos. 220145 & 220146

(Consolidated)

ARKANSAS, *et al., Defendants.*

**NON-PARTY MONEYGRAM PAYMENT SYSTEMS INC.'S
CROSS-MOTION FOR AN ORDER DIRECTING PARTIAL RELEASE OF
DEPOSITED FUNDS PURSUANT TO 28 U.S.C. § 2042 AND TO FILE
DOCUMENTS UNDER SEAL**

PLEASE TAKE NOTICE THAT, at a date and time to be determined by the Special Master in this action, Non-Party MoneyGram Payment Systems, Inc. (“MoneyGram”) shall move for an order, pursuant to 28 U.S.C. § 2042, directing the release of \$ 5,343,239.42 to MoneyGram from the Court Registry Investment System account established for Case No. 1:18-mc-00064-PNL in the United States District Court for the Southern District of New York (the “Escrow Account”) representing Official Checks that MoneyGram subsequently paid or reimbursed; and

PLEASE TAKE FURTHER NOTICE THAT, in support of this application, MoneyGram shall rely upon the accompanying memorandum of law, the First Declaration of Colleen Elvin dated June 7, 2023 Concerning 2022 Reclaims, the Second Declaration of Colleen Elvin dated June 7, 2023 Concerning 2023 Reclaims, and the Declaration of Michael Rato dated June 7, 2023; and

PLEASE TAKE FURTHER NOTICE THAT, in accordance with the Stipulation and Protective Order approved by the Special Master on January 16, 2018, MoneyGram shall request the entry of an Order providing that the exhibits to

the accompanying Declarations of Colleen Elvin – which contain information entitled to “Confidential” treatment under the Protective Order – shall be filed under seal; and

PLEASE TAKE FURTHER NOTICE THAT, a proposed form of order approving the filing under seal and a proposed form of order granting MoneyGram’s motion for the release of funds are submitted herewith.

Dated: New York, New York
 June 7, 2023

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