No. 22O145 & 22O146, Original (Consolidated)

IN THE
SUPREME COURT OF THE UNITED STATES

DELAWARE,
Plaintiff,
v.
PENNSYLVANIA AND WISCONSIN,
Defendants.
****
ARKANSAS, ET AL.,
Plaintiffs,
v.
DELAWARE,
Defendants.

PENNSYLVANIA'S REPLY BRIEF IN FURTHER SUPPORT OF MOTION FOR ORDER DIRECTING WITHDRAWAL OF DEPOSITED FUNDS

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According to the Defendant States' analysis (docket #162)—which Pennsylvania adopts—a mere $628,199.34 of the $88,804,693.73 principal on deposit belongs to Delaware; just 0.71%. In contrast, Pennsylvania's stake in the escrowed principal is nearly ten-fold Delaware's, at $6,149,078.91. But despite Delaware's less than one-percent claim, it wants to delay any distribution of the $88 million to *any* State because maybe, somewhere, someday, somehow it will find additional instruments to bolster its 0.71% interest. This does not sound remotely fair because it isn't. Regardless, no Delaware proffered justification to cause the delayed distribution to Pennsylvania—or any other State—withstands scrutiny.[1]

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[1] Delaware's modest stake in the escrowed funds exactly mirrors the small stake it has in the sums it received from MoneyGram prior to this litigation, which likewise equals less than 1 percent. As stated by the Supreme Court:

> Indeed, the facts of these very cases reflect the inequitable escheatment dynamic that is at the heart of the FDA: According to the Defendant States, Delaware took $250 million between 2002 and 2017 pursuant to the common law's escheatment rules with respect to Disputed Instruments that were purchased across the Nation, whereas, if the FDA applied, that State would have been entitled to only about $1 million.

Delaware v. Pennsylvania, 143 S.Ct. 696, 707 n.7 (2023).

I. ARGUMENT

A. Extensive discovery is not needed to resolve the proper distribution of the escrowed funds.

The oft-repeated claim in Delaware's response to Pennsylvania's pending Motion for Order Directing Withdrawal of Deposition Funds (docket #146) is that extensive third-party and expert discovery is needed before the escrowed funds can be distributed to Pennsylvania or any other State. *See* DE Br. at 2-3, 8-9, 16, 19.

This is not so for the reasons Delaware itself admits in its brief. Specifically, Delaware first alleges that MoneyGram's books and records do not, in fact, show the place of purchase of the instruments that Pennsylvania claims. *See* DE Br. at 11-18. Let's assume this is true (it isn't, *see infra*). This then means, legally, that distribution of the escrowed money is not governed by Section 2503(1) of the FDA, which says the State of the place of purchase, according to the "books and records of such banking or financial organization of business association," is entitled to escheat the sums payable. 12 U.S.C. § 2503(1). So far so good for Delaware's demand for discovery. But what the FDA next says in paragraph 2 is fatal to Delaware's discovery wishes.

So as to not bury the lede, the key word in paragraph 2 is "until." Here's why that word is material. Paragraph 2 says that "if the books and records [of the holder] do not show the State in which [the instrument] was purchased," then the State that "shall be entitled" to custody is the State in which the holder has its principal place of business. 12 U.S.C. § 2503(2). And then paragraph 2 also says *when* that State shall be entitled to invoke its custody right: "*until* another State shall demonstrate by written evidence that it is the State of purchase[.]" 12 U.S.C. § 2503(2) (emphasis added).

In other words, Section 2503(2) says that if the books and records of the holder do not show the place of purchase, then the State of the holder's principal place of business shall immediately take custody of the sum until such time as another State comes forward with proof that it has a superior custody right.

Delaware's demand for immediate, and far-ranging discovery (nearly 25,000 instruments sold by dozens of financial institutions are attributable to Pennsylvania alone), flips the administration of the FDA on its head. Delaware wants to *first* search for "written evidence"' of a superior right to escheat, and *then* send the money to the state of

purchase or the principal place of business. But that simply is not what the FDA commands is the order of operations. Distribution must *first* be made, either to the State of the place of purchase or to the State of the principal place of business, *and then* if another State finds evidence that the escheat should go someplace else, only then does the money shift. The Court may appropriately presume the States will comply with the existing FDA's statutory mechanism for the resolution of any such reporting claims.

Here's where the foregoing leaves Delaware. If it actually believes MoneyGram's books and records are faulty, then the money should escheat to the state of the principal place of business, which is either Minnesota—according to Delaware—or Texas, but in any event, it is *not* Delaware. But discovery is absolutely not the next thing that should occur according to the FDA itself. Distribution should occur—immediately. Moreover, Delaware's proposed discovery will not lead to the disclosure of any fact that would or could alter the FDA's statutory reporting directives.

And this order of events makes perfect sense. The FDA is a statutory set of rules expressly designed to facilitate swift and equitable

distribution among the States, without burdensome record-keeping. *See* 12 U.S.C. § 2501. These rules buttress the common law's equally clear rules, which eschew fact-intensive inquiries, since such inquiries "create so much uncertainty and threaten so much expensive litigation that the States might find that they would lose more in litigation expenses than they might gain in escheats." *See Texas v. New Jersey*, 379 U.S. 674, 679 (1965). Delaware wants to re-order this situation to issue subpoenas far and wide in hopes that maybe, somewhere, someday, somehow it will find one or more instruments that could possibly be attributable to Delaware. Yet, this is simply not what the FDA permits. Either the escrow money should go, in part, to Pennsylvania based on MoneyGram's books and records, or the money should go to the State of MoneyGram's principal place of business. In either event, years of discovery before the distribution is utterly contrary to the express rules of the FDA.

B. MoneyGram's books and records show the place of purchase.

Delaware's characterization of MoneyGram's books and records, and its demands for extensive third-party discovery from MoneyGram's

clients, obfuscates both the commands of the FDA and what MoneyGram has testified, under oath, about its records.

Turning first to the FDA, Delaware's demands to look beyond MoneyGram's books and records is without statutory basis. Indeed, the FDA states that *only* the books and records of the holder—here, MoneyGram—are the books and records that should be inspected when deciding proper escheat:

> (1) if the books and records *of such banking or financial organization or business association* show the State in which such money order, traveler's check, or similar written instrument was purchased …;
>
> (2) if the books and records *of such banking or financial organization or business association* do not show the State in which such money order, traveler's check, or similar written instrument was purchased, …; or
>
> (3) if the books and records *of such banking or financial organizations or business association* show the State in which such money order, traveler's check, or similar written instrument was purchased and the laws of the State of purchase do not provide for the escheat or custodial taking of the sum payable on such instrument, ….

12 U.S.C. § 2503(1)-(3) (emphasis added). Against the above, Delaware's insistence on "third-party discovery on individual banks," *see* DE Br. at 17, is legally infirm because that would only reveal information about

the books and records of a *non*-holder; it would reveal nothing about MoneyGram, the only holder.

Next, Delaware's description of MoneyGram's sworn testimony about its own books and records is decidedly incomplete. Far from agreeing its records are "flawed," *see* DE Br. at 2, MoneyGram states it cannot say with absolute certainty—a standard not required in a civil proceeding—where each and every instrument was sold. But what MoneyGram further states is that its books and records absolutely *do* reflect the place where MoneyGram's clients reported to MoneyGram the instrument should be attributed:

> 9. When financial institution address information is provided in connection with a particular Official Check, that address is most accurately described as the address in MoneyGram's Edison system associated with the "Customer" location that reported the sale/issuance of that Official Check to MoneyGram.
>
> 10. MoneyGram cannot verify that the specific financial institution address associated with a specific Official Check in the Edison system is the physical location where the item was purchased (though it is my understanding that is usually the case). However, MoneyGram can verify that such an address is the most granular level of address information associated with a particular Official Check that is available to MoneyGram.

See Johnson Decl. at ¶¶ 9-10 (attached as Ex. B to Wellington Decl.); *see also id* at ¶ 14 ("In all events, the address information in Edison is provided by the Client, not MoneyGram.").[2] MoneyGram further expressly states its understanding that the address listed in its records—the ones relied on by Pennsylvania with the pending Motion—is "usually" the physical location where the item was actually purchased, *see* Johnson Decl. at ¶ 10, and that, by and large, most clients report Official Checks out of multiple locations, *see id.* at ¶ 12; i.e., they report based on a specific place of purchase.

Further, Delaware makes much ado about single locations reporting multiple instruments, which Delaware, based on rank speculation, infers is implausible. *See* DE Br. at 13-14, n.5-8. But MoneyGram offers a rationale for this fact. Specifically, MoneyGram reports that because the Official Check program is used by MoneyGram's client-banks to pay their own debts, in consequence, "a substantial amount of Official Checks may be associated with a single

[2] At the time of this reply brief, a redacted version of the Johnson Declaration has not yet been filed by Delaware per the Court's Order of August 4, 2023 (docket #164). Thus, in an abundance of caution, before directly quoting the Declaration, the undersigned counsel conferred with MoneyGram's counsel, who confirmed that the quoted passages herein are not deemed "confidential" by MoneyGram.

Client location[.]" *See* Johnson Decl. at ¶ 13. In other words, where the corporate office is paying corporate debts, multiple instruments will be associated with a single address. This makes perfect sense.

In short, far from identifying flaws in MoneyGram's records, Delaware has identified a wish that MoneyGram's clients—i.e., the non-holders—had reported more or "better" information on the place of sale. But this is not enough to thwart appropriate, and swift, escheat under the FDA. The FDA commands that the Court and the parties look solely to the holder's books and records. Here, those books and records show a place of purchase for each instrument. That Delaware believes that place of purchase *may* be wrong is not justification to ignore the equitable priority rules in the FDA.

C. None of the institutions specifically identified by Delaware as warranting further discovery have locations in Delaware.

Delaware identifies by name six MoneyGram client-institutions that have locations in multiple states, which, Delaware then declares requires discovery to see which of their many locations sold the instruments at issue. *See* DE Br. at 13-14. But there's a flaw with Delaware's observation and demand for discovery: *none* of the six

institutions have locations in Delaware. Thus, Delaware's "concern" for the "true" place of purchase is a concern it has no standing to raise.

For instance, Susquehanna Bank, *see* DE Br. at 12-13, became BB&T and then later became Truist.[3] Truist has no locations in Delaware according to its 2023 SEC Form 10-K filing. *See* Truist Financial Corporation, SEC Form 10-K for the Fiscal Year Ended Dec. 31, 2022.[4] Nor did BB&T according to its 2018 SEC Form 10-K filing. *See* BB&T Corporation, SEC Form 10-K for the Fiscal Year Ended Dec. 31, 2017.[5] And nor did Susquehanna Bank according to its 2015 SEC Form 10-K filing. *See* Susquehanna Bancshares, Inc., SEC Form 10-K for the Fiscal Year Ended Dec. 31, 2014.[6]

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[3] Daniel Urie*, Merger Between Two Large Banks Completed But Central Pa. Customers Shouldn't Notice Any Immediate Changes*, PennLive (Dec. 14, 2019), *available at* https://www.pennlive.com/life/2019/12/merger-between-two-large-banks-completed-but-central-pa-customers-shouldnt-notice-any-immediate-changes.html.

[4] *Available at* https://www.sec.gov/ix?doc=/Archives/edgar/data/92230/000009223023000034/tfc-20221231.htm (listing locations in Alabama, Florida, Georgia, Kentucky, Maryland, New Jersey, North Carolina, Pennsylvania, South Carolina, Tennessee, Texas, Virginia, Washington DC, and West Virginia).

[5] *Available at* https://www.sec.gov/Archives/edgar/data/92230/000009223018000021/form10-k_4q17.htm (listing locations in Alabama, Florida, Georgia, Kentucky, Maryland, New Jersey, North Carolina, Pennsylvania, South Carolina, Tennessee, Texas, Virginia, Washington DC, and West Virginia).

[6] *Available at* https://www.sec.gov/Archives/edgar/data/700863/000119312515065490/d869024d10k.htm (listing locations in Maryland, New Jersey, Pennsylvania, and West Virginia).

Next, Sterling Bank and Trust, *see* DE Br. at 13, according to its 2023 SEC Form 10-K filing, has no locations in Delaware. *See* Sterling Bancorp, Inc, SEC Form 10-K for the Year Ended Dec. 31, 2022.[7]

Further, Cadence Bank, *see* DE Br. at 13, likewise has no locations in Delaware according to its August 2023 FDIC Form 10-Q filing. *See* Cadence Bank, FDIC Form 10-Q for the Quarterly Period Ended June 30, 2023.[8]

The balance of locations mentioned in Delaware's footnote 8—First Financial Bank,[9] Great Western Bank[10] (now known as First Interstate Bank[11]), and Pawtucket Credit Union[12] (now known as Coastal1 Credit Union)—all likewise have no locations in Delaware.

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[7] *Available at* https://www.sec.gov/Archives/edgar/data/1680379/000110465923033182/sbt-20221231x10k.htm (listing locations in California, New York, and Michigan).

[8] *Available at* https://efr.fdic.gov/fcxweb/efr/fcxservlet/PublicEfrFileDownload?instFlngId=11380&instFlngAtchId=1&fileType=instFlng (listing locations in Alabama, Arkansas, Florida, Georgia, Louisiana, Mississippi, Missouri, Tennessee, and Texas).

[9] First Financial Bancorp., SEC Form 10-K for the Fiscal Year Ended Dec. 31, 2022, *available at* https://www.sec.gov/ix?doc=/Archives/edgar/data/708955/000070895523000016/ffbc-20221231.htm (listing locations in Illinois, Indiana, Kentucky, and Ohio).

[10] Great Western Bancorp, Inc, SEC Form 10-K for the Fiscal Year Ended Sept. 30, 2021, *available at* https://www.sec.gov/Archives/edgar/data/1613665/000161366521000052/gwb-20210930.htm (listing locations in Arizona, Colorado, Iowa, Kansas, Minnesota, Missouri, Nebraska, North Dakota, and South Dakota).

[11] First Interstate Bank, *Great Western Bank is Now First Interstate Bank* (May 23, 2022), *available at* https://www.firstinterstatebank.com/company/

In short, every institution Delaware identified as an institution whose records need examined is an institution with *no locations in Delaware*. Thus, Delaware has no cognizable legal interest to justify discovery as to any of these entities.

D. None of the institutions that Delaware claims sells instruments online is a seller of any of the Pennsylvania instruments.

Next, Delaware identifies by name three MoneyGram client-institutions that it claims sell Official Checks online—Alliant Credit Union, Merrick Bank, and Delta Community Credit Union—which, in turn, it claims warrants discovery. *See* DE Br. at 14-17. But these three institutions present another problem for Delaware as it concerns Pennsylvania's pending Motion. Not one of these three institutions is listed on MoneyGram's books and records as having sold one of the Pennsylvania instruments in the escrow deposit.

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news/522/great-western-bank-is-now-first-interstate-bank#:~:text=It's%20an%20exciting%20day%E2%80%94all,operating%20as%20First%20Interstate%20Bank.

[12] Coastal1 Credit Union, NCUA Profile Form 4501A (effective June 30, 2021), *available at* https://mapping.ncua.gov/CreditUnionDetails/67278 (listing locations in Massachusetts and Rhode Island).

E. The “care of” institutions are not associated with the Pennsylvania instruments.

Delaware next identifies that certain MoneyGram client-institutions listed sales “care of” another institution, which Delaware then claims warrants discovery. *See* DE Br. at 17. But the institutions impacted by this practice—each listed in the Johnson Declaration at paragraphs 16 & 18—neither had a location in Delaware nor sold one of the Pennsylvania instruments. Once again, Delaware is invoking the rights of other States and raising an “issue” that is irrelevant to the pending Motion.

F. Pennsylvania was not required to meet with Delaware before filing the Motion or to seek leave to file the same.

Delaware argues the Motion should be summarily denied because Pennsylvania didn’t first discuss it with Delaware or seek leave to file it. *See* DE Br. at 19-20. In making this argument, Delaware, notably, cites to no rule, case management order, or anything else that would have imposed these obligations on Pennsylvania. The argument is invented from whole cloth and represents only Delaware’s *ipse dixit* about what Pennsylvania should have done. This is not a sufficient basis to dismiss the Motion. Moreover, Delaware’s brief elides the fact

that the parties met and conferred for *two months* about settlement of Pennsylvania's Motion, the escrow fund, and the case overall, *see* June 7, 2023 Order (docket #153), before Delaware was obligated to answer the Motion.

G. Delaware's concern about "piecemeal" distribution is moot.

Delaware's argument about "piecemeal" distribution of the escrow account, *see* DE Br. at 20, is moot in light of the August 4, 2023 Joint Status Report (docket #162). In that filing, the Defendant States expressly demanded a distribution similar to Pennsylvania's and supplied state-by-state distribution totals for every State, Delaware included, which account for both the escrow principal deposits and earnings. *See* Joint Status Report at 6-9. Pennsylvania joins that analysis and the demand in total.[13]

[13] Delaware claims Pennsylvania made "errors"—plural—in calculating its rightful portion of the escrow deposit. *See* DE Br. at 20. This is an overstatement. Pennsylvania made a single calculation error for one year, under-counting by approximately $2500 the money due to Pennsylvania (out of over $6 million). Pennsylvania later identified that error and disclosed it to the Court and the parties. *See* Pennsylvania Response to MoneyGram Motion, at 2 n.1 (docket #158).

H. Delaware's claim that Pennsylvania has not identified specific instruments is moot.

Delaware states that Pennsylvania has not supplied it with a spreadsheet to identify the instruments Pennsylvania claims custody of. *See* DE Br. at 21. This claim, when written, was *largely* moot since Delaware had the same spreadsheets from MoneyGram that Pennsylvania received and described in the Motion, spreadsheets that fully identified the instruments at issue with the escrow deposits. But, regardless, this claim is now *entirely* moot. On August 4, 2023, Delaware received from the Defendant States a state-by-state breakdown of escrow instruments attributable to each state. Pennsylvania adopts the itemized spreadsheet of instruments attributable to Pennsylvania and described in the spreadsheet named "PA Detail Schedule."[14] Thus, Delaware's argument about lack of information is now moot.

[14] If the Court requires a copy of PA Detail Schedule, Pennsylvania is prepared to file it under seal, which is necessary because it identifies various information that MoneyGram asserts is confidential.

I. Pennsylvania has set forth a detailed plan for distributing escrow earnings.

Lastly, Delaware claims that Pennsylvania has not, somehow, "adequately addressed" how to distribute earnings on the escrow deposit. *See* DE Br. at 21. This concern is also moot in light of the Joint Status Report. That filing describes a comprehensive proposal for state-by-state interest distributions, including $238,829.06 for Pennsylvania, and Pennsylvania adopts that analysis. Finally, if distribution of the interest is the sole issue in dispute, Pennsylvania requests that the Court at least enter an order directing distribution of the principal while an interest solution is determined.

II. CONCLUSION

Delaware's response to Pennsylvania's Motion is a playbook for needless delay. Not one of its "concerns" withstands scrutiny, which leads only to the conclusion that Delaware wants to stall more than it wants to see these escrowed funds distributed to the appropriate State. At this juncture, Pennsylvania is compelled to once-again return focus to the touchstone of any unclaimed property argument. Not one of the States at bar, Pennsylvania included, is the true owner of these funds. They belong to persons in every State. The long-established paradigm—

borrowed from England—is to ensure that *if* those true owners cannot be restored to possession of their property, then *at least* they should receive indirect benefits of it from the State in which they live. That paradigm is directly challenged by Delaware here, with its insistence that the Court take a magnifying glass to MoneyGram's and its client-institution's books and records to see if somehow, somewhere, some unidentified "mistake" happened about place of purchase. But this proposal is a non-starter because it thwarts the equity the unclaimed property regime—through the FDA, common law, and each States' statutory laws—is expressly designed to achieve.

In short, enough is enough. The escrow account was set up in early 2018—over five years ago—to let the States litigate before the Supreme Court about what the FDA does or does not say. That litigation ended in February—nearly six months ago. Then, the parties' discussions about the escrow account distribution began in earnest after the Special Master's March 23, 2023 Case Management Order—nearly five months ago. Finally, Pennsylvania filed its Motion on May 2—over three months ago. In light of this protracted history, the time to equitably distribute the funds is now, not two years from now.

Unclaimed property statutes are designed to equitably and cheaply distribute property fairly among the States; what Delaware proposes accomplishes none of that.

Therefore, Pennsylvania respectfully requests that the Court grant its Motion and enter an order directing the Clerk of Court for the Southern District of New York to remit to Pennsylvania $6,149,078.91 in principal and $238,829.06 in earnings, less the Court-ordered administrative fee.

Respectfully submitted,

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Dated: August 11, 2023

CERTIFICATE OF SERVICE

I hereby certify that on August 11, 2023, I served by email the foregoing Reply Brief on all counsel listed in the Amended Service Lists of April 27, 2023.

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