

OCT 10 2016
OFFICE OF THE CLERK

No. 220146

**In The
Supreme Court of the United States**

STATE OF ARKANSAS, STATE OF TEXAS,
STATE OF ALABAMA, STATE OF ARIZONA,
STATE OF COLORADO, STATE OF FLORIDA,
STATE OF IDAHO, STATE OF INDIANA,
STATE OF KANSAS, COMMONWEALTH OF
KENTUCKY, STATE OF LOUISIANA, STATE
OF MICHIGAN, STATE OF MONTANA, STATE
OF NEBRASKA, STATE OF NEVADA, STATE
OF NORTH DAKOTA, STATE OF OHIO,
STATE OF OKLAHOMA, STATE OF
SOUTH CAROLINA, STATE OF UTAH,
AND STATE OF WEST VIRGINIA,

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Plaintiffs/Counter-Defendants,

v.

STATE OF DELAWARE.

Defendant/Counter-Plaintiff.

MOTION FOR LEAVE TO AMEND BILL OF COMPLAINT

The States of Arkansas, Texas, Alabama, Arizona, Colorado, Florida, Idaho, Indiana, Kansas, Louisiana, Michigan, Montana, Nebraska, Nevada, North Dakota, Ohio, Oklahoma, South Carolina, Utah, and West Virginia, and the Commonwealth of Kentucky (“Plaintiff States”), move this honorable Court for leave to amend the Bill of Complaint filed in the above captioned matter to include as additional plaintiffs, the States of California, Iowa, Maryland, Oregon, Washington, and the Commonwealth of Virginia. The State of Delaware does not object to this motion.

PAMELA JO BONDI
Attorney General of Florida

LAWRENCE G. WASDEN
Idaho Attorney General

GREGORY F. ZOELLER
Attorney General of Indiana

DEREK SCHMIDT
Attorney General of Kansas

ANDY BESHEAR
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ALAN WILSON
South Carolina
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SEAN D. REYES
Utah Attorney General

PATRICK MORRISEY
West Virginia
Attorney General

October 10, 2016

EXHIBIT

A

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Attorney General of California

THOMAS J. MILLER
Attorney General of Iowa

BRIAN E. FROSH
Attorney General of Maryland

ELLEN F. ROSENBLUM
Attorney General
State of Oregon

MARK R. HERRING
Attorney General
Commonwealth of Virginia

ROBERT W. FERGUSON
Attorney General of Washington

STATE OF ARKANSAS, STATE OF TEXAS,
STATE OF ALABAMA, STATE OF ARIZONA,
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STATE OF IDAHO, STATE OF INDIANA,
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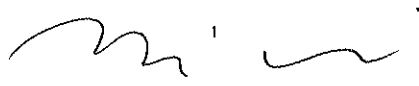
CERTIFICATE OF SERVICE

I hereby certify that I did on the 10th day of October 2016 send out from Little Rock, Arkansas a package containing an original and 10 copies of the foregoing Motion for Leave to Amend Bill of Complaint in the above captioned matter. All parties required to be served have been served by third-party commercial carrier for delivery within 3 calendar days. Packages were addressed to the following:

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17 W. Main Street
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Counsel for the State of Wisconsin



Nicholas J. Bronni

On September 19, 2016, Counsel for Arkansas informed the Court by letter that if the Court exercised jurisdiction over this matter, the Plaintiff States intended to seek leave to amend their original complaint to include identical claims against Delaware by California, Iowa, Maryland, Oregon, Virginia, and Washington.

On October 3, 2016, this Court granted the Plaintiff States' Motion for Leave to File Bill Of Complaint and ordered this case consolidated with *State of Delaware v. Commonwealth of Pennsylvania and State of Wisconsin*, No. 220145. See ___ U.S. ___, 2016 WL 5640131 (2016). The allegations and claims for relief by California, Iowa, Maryland, Oregon, Virginia, and Washington are identical in every material respect to the allegations and claims of the Plaintiff States.

Counsel for California, Iowa, Maryland, Oregon, Virginia, and Washington are listed in Exhibit A to this motion.

KEN PAXTON
Texas Attorney General

LUTHER STRANGE
Alabama Attorney General

MARK BRNOVICH
Arizona Attorney General

CYNTHIA H. COFFMAN
Colorado Attorney General

Respectfully submitted,



LESLIE RUTLEDGE
Arkansas Attorney General

LEE RUDOFSKY*
Arkansas Solicitor General

NICHOLAS J. BRONNI
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**Counsel of Record*