

In the Supreme Court of the United States

STATE OF IOWA AND STATE OF MONTANA,

Plaintiffs,

v.

STATE OF ARIZONA; STATE OF CALIFORNIA; STATE OF
COLORADO; STATE OF CONNECTICUT; COMMONWEALTH OF
MASSACHUSETTS; STATE OF MINNESOTA; STATE OF NEVADA;
STATE OF NEW JERSEY; STATE OF NEW MEXICO; STATE OF
NEW YORK; STATE OF OREGON; AND STATE OF
WASHINGTON,

Defendants.

BRIEF IN OPPOSITION

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STATEMENT

1. Section 7 of the Clayton Act, 15 U.S.C. § 18, prohibits mergers where the effect “may be substantially to lessen competition, or to tend to create a monopoly.” The United States may file suit to enforce Section 7. 15 U.S.C. § 4. Nonfederal parties—including States—are also authorized to enforce Section 7. *See* 15 U.S.C. § 26; *Hawaii v. Standard Oil Co. of Cal.*, 405 U.S. 251, 261 (1972). Such “enforcement of the [Clayton] Act was in no sense an afterthought; it was an integral part of the congressional plan for protecting competition.” *California v. Am. Stores Co.*, 495 U.S. 271, 284 (1990); *see id.* at 276 (explaining that California filed suit challenging the merger at issue after the FTC had given its final approval to the merger).

2. In early 2026, Paramount Skydance Corp. (“Paramount”) agreed to acquire all outstanding shares of Warner Bros. Discovery, Inc. (“Warner Bros.”) for \$31 per share, a transaction valued at approximately \$110 billion. Compl. ¶¶ 1, 34, *California v. Paramount Skydance Corp.*, No. 26-cv-07116 (N.D. Cal. July 13, 2026), Dkt. 1.¹ The combined entity would control two of the “big five” film studios, more than fifty basic cable channels, three subscription streaming services, and three of the most prolific television production studios. *Id.* ¶ 35.

Paramount and Warner Bros.’s agreement anticipates a substantial period of antitrust review. Dkt. 204-3, at 79-80. It includes a provision that allows either party to opt out of the merger beginning March 4, 2027, if the transaction has not yet closed,

¹ References to “Dkt.” refer to the district court docket in *California v. Paramount Skydance Corp.*, No. 26-cv-07116 (N.D. Cal.).

but that date is automatically extended to June 4, 2027, if regulatory or court approval is pending. *Id.* at 77-80. That date can be further extended by agreement of the two companies. *Id.* at 79-80. The contractual purchase price at closing is \$31 per share plus a “[t]icking [c]onsideration” of \$0.25 for every 90-day quarter beginning after September 30, 2026, through closing. *Id.* at 106, 108.

3. Respondent States filed a lawsuit challenging the merger in federal district court, raising a single antitrust claim under Section 7 of the Clayton Act. Dkt. 1. The complaint alleges that Paramount’s acquisition of Warner Bros. will likely harm competition in at least three product markets: (1) distribution of wide-release theatrical films; (2) distribution of anticipated top-grossing theatrical films; and (3) licensing of basic cable channels to distributors. *Id.* ¶ 36. The likely effects of this reduced competition are higher prices, lower quality, and reduced output in the two theatrical film markets, *id.* ¶ 74, and higher fees and reduced investment in content in the basic cable channels market, *id.* ¶ 86. The district court granted a temporary restraining order. Dkt. 141. It then set an expedited schedule for consideration of respondent States’ preliminary injunction motion, alongside a similar motion filed by the Writers Guild of America (“WGA”) in a separate case challenging the same merger. *Id.* at 9; Dkt. 166 at 2.²

The parties in both cases subsequently filed a stipulation in which Paramount and Warner Bros. agreed

² The WGA case is *Writers Guild of America, West, Inc. v. Paramount Skydance Corp.*, No. 26-cv-07212 (N.D. Cal.). There is a third lawsuit challenging the merger, *Faust v. Paramount Skydance Corp.*, No. 26-cv-3790 (N.D. Cal.).

that their transaction “shall not close, be consummated, or otherwise be completed and [that Paramount and Warner Bros.] will not take any steps, directly or indirectly, to integrate or consolidate their operations pursuant to the Transaction until the earlier of (1) five days after the merits determination in these matters, or (2) June 1, 2027.” Dkt. 169 at 3. The district court entered the stipulation, removed the preliminary injunction hearing from the calendar, and set the cases for trial in early March 2027. Dkt. 170 at 2, 10; Dkt. 197 at 2.

4. On August 25, 2026, Iowa and Montana filed a motion in this Court for leave to file a bill of complaint. The proposed complaint asks the Court to declare that respondent States may not obtain an injunction against the merger; to declare that the merger does not violate the Clayton Act; and to enjoin respondent States from continuing their suit in district court. Compl. ¶ 92. In their brief in support of the motion, Iowa and Montana ask the Court to hold that original jurisdiction over suits between States is mandatory rather than discretionary. *See* Br. 5-13. Alternatively, they contend that the Court should exercise original jurisdiction over the dispute because the delay and uncertainty about the merger affects “hiring, firing, licensing, [and] investment” in the businesses, which in turn allegedly harms Iowa’s and Montana’s economies and their residents’ access to content and services. Br. 21; *see* Compl. ¶¶ 61-70, 85. The proposed complaint does not seek any relief against WGA’s suit challenging the same merger, which was proceeding on the same litigation timeline as respondent States’ action.

5. This week, respondent States, Paramount, and Warner Bros. filed a joint motion, asking the district court to enter a consent decree “resolv[ing] the claims

alleged” in the underlying antitrust lawsuit. Dkt. 243 at 1. As part of the joint motion, the parties requested an order dissolving the stipulation and order not to close the merger, as well as entry of the consent decree as a final judgment. *Id.* at 3-4. On September 24, the district court held a hearing and requested further briefing addressing amicus filings related to the proposed consent decree by September 28. On September 21, the parties in the WGA matter dismissed that action after entering into a settlement agreement resolving WGA’s claims. *WGA v. Paramount Skydance Corp.*, No. 26-cv-07212 (N.D. Cal.), Dkt. 111.³

ARGUMENT

Iowa and Montana ask this Court to exercise its original jurisdiction to halt respondent States’ anti-trust suit currently pending in district court or to decide the merits of that suit in the first instance, rather than waiting to consider it in the ordinary course of appellate review. But the parties to that lawsuit have agreed to resolve the claims and dissolve the stipulation not to close, “such that Paramount and Warner Bros. may close, consummate, and otherwise complete” their merger. Dkt. 243 at 3. Once the district court enters the consent decree or issues final judgment resolving the claims, Iowa and Montana will have all the practical relief that they seek through their original action—that is, “certainty” that respondent States’ lawsuit will not prevent the merger from closing, *e.g.*, Br. 21, mooted any claim for relief here, *see generally Church of Scientology of Cal. v. United States*, 506 U.S. 9, 12 (1992).

³ The plaintiffs in *Faust* filed a second motion for a temporary restraining order, *see* Mot., *Faust v. Paramount Skydance Corp.*, No. 26-cv-3790 (N.D. Cal.), Dkt. 92 (Sept. 21, 2026).

Even if the case were not to become moot, it would be an extraordinary departure from this Court’s practices to exercise original jurisdiction over this case. The Court has long refused to exercise original jurisdiction when there is an alternative forum in which the issues raised in the proposed complaint can be litigated. Here, those issues were being litigated in the very antitrust suit Iowa and Montana seek to enjoin—as well as a separate action brought by private plaintiffs in the same district court. Given that respondents’ Clayton Act claim is highly fact-intensive—just as antitrust claims often are—a federal district court is a far more suitable forum for resolving that claim in the first instance.

Leave to file an original action should also be denied for other reasons: The economic harms alleged by the putative complaint are principally harms to private businesses—Paramount and Warner Bros.—not to Iowa’s or Montana’s sovereign interests. And Iowa and Montana fail to show that they have a cause of action or plausible arguments on the merits. Respondent States filed the lawsuit because the merger would harm competition in violation of the Clayton Act and were prepared to prove such harm at the March 2027 trial. The proposed consent decree delivers “substantial” relief that “directly addresses” the “antitrust harms of reduced output and increased prices.” Dkt. 243 at 2.

I. IOWA AND MONTANA CANNOT SATISFY THE DEMANDING STANDARD FOR INVOKING THIS COURT’S ORIGINAL JURISDICTION

1. This Court has long “interpreted the Constitution and [Judiciary Act] as making [its] original jurisdiction ‘obligatory only in appropriate cases,’”

Mississippi v. Louisiana, 506 U.S. 73, 76 (1992) (quoting *Illinois v. City of Milwaukee*, 406 U.S. 91, 93 (1972)), and therefore “as providing [the Court] ‘with substantial discretion to make case-by-case judgments as to the practical necessity of an original forum in this Court,’” *id.* (quoting *Texas v. New Mexico*, 462 U.S. 554, 570 (1983)); *see also, e.g., Wyoming v. Oklahoma*, 502 U.S. 437, 450-451 (1992); *Texas*, 462 U.S. at 570.

Iowa and Montana contend that those decisions merely reflect the “Court’s practice of declining to hear” original actions between States, or that the decisions serve as “dicta,” not “[b]inding [p]recedent.” Br. 8, 11 n.4. That is incorrect. The Court has repeatedly held that “this Court applies discretion when accepting original cases, even as to actions between States where [the Court’s] jurisdiction is exclusive.” *Wyoming*, 502 U.S. at 450. Indeed, even the justices who have questioned that principle have “called for revisiting the Court’s *precedents* in this area.” *Florida v. California*, 146 S. Ct. 1290, 1292 (2026) (Thomas, J., dissenting) (emphasis added); *see also Nebraska v. Colorado*, 577 U.S. 1211, 1035 (2016) (Thomas, J., dissenting) (“I have previously applied the Court’s *precedents* taking this discretionary approach.” (emphasis added)). Despite those calls, the Court has repeatedly declined to revisit those precedents, including in multiple cases earlier this year. *See, e.g., Florida*, 146 S. Ct. at 1290; *Florida v. California*, 146 S. Ct. 2688 (2026); *Alabama v. California*, 145 S. Ct. 757, 757 (2025). Iowa and Montana offer no persuasive justification for a different result here.

2. Nor does this case present the type of dispute between sovereigns that warrants an exercise of original jurisdiction. The Court’s “original ‘jurisdiction is of so delicate and grave a character that it was not

contemplated that it would be exercised save when the necessity was absolute.” *Mississippi v. Louisiana*, 506 at 76 (quoting *Louisiana v. Texas*, 176 U.S. 1, 15 (1900)). In applying that discretionary standard, the Court generally considers two factors: first, “the availability of an alternative forum in which the issue tendered can be resolved,” *id.* at 77, and second, “the nature of the interest of the complaining State,’ focusing on the ‘seriousness and dignity of the claim,”’ *id.* (quoting *City of Milwaukee*, 406 U.S. at 93) (citation omitted). Neither supports the extraordinary exercise of original jurisdiction here.

a. In the event this matter does not become moot, the availability of an alternative forum is self-evident. Iowa and Montana ask the Court to “[d]eclare that the Paramount-Warner Bros. merger does not violate the Clayton Act.” Compl. ¶ 92(c). Whether the proposed merger violates the Clayton Act is the sole claim presented in the pending district court proceedings that Iowa and Montana seek to enjoin. *See* Dkt. 1 ¶ 109. Indeed, Iowa and Montana concede that the district court lawsuit “raises identical issues of fact and law as this original suit.” Compl. ¶ 91. And Paramount and Warner Bros. have asked the district court for relief identical to the relief sought by Iowa and Montana here: a declaration that the merger is “procompetitive, not anticompetitive.” Dkt. 114 at 7; *see also* Answer 34-35, *WGA v. Paramount Skydance Corp.*, No. 26-cv-07212, Dkt. 103 (Sept. 11, 2026). The district court plainly provides an alternative forum for resolving whether the merger is lawful.

As this Court has recognized in similar circumstances, the availability of an alternative forum is reason enough to deny a motion for leave to file a bill of complaint. In *Arizona v. New Mexico*, 425 U.S. 794

(1976) (per curiam), for example, Arizona sought to challenge a New Mexico law that imposed a tax on electricity generated in New Mexico. *Id.* at 794-795. The law also provided a tax credit “in the amount of the electrical energy tax paid for electricity consumed in New Mexico”—but not elsewhere, including Arizona. *Id.* at 795. The Court emphasized that Arizona utilities that operated generating facilities in New Mexico and sold energy to consumers in Arizona had already filed a lawsuit in New Mexico state court challenging the tax and raising the same constitutional issues Arizona sought to press. *Id.* at 794, 796. Because “the pending state-court action provides an appropriate forum in which the issues tendered here may be litigated,” the Court “den[ie]d the State of Arizona leave to file,” observing that the Court could exercise its appellate jurisdiction if the state courts rejected the utilities’ challenge. *Id.* at 797 (emphasis omitted); see also *Louisiana v. Mississippi*, 488 U.S. 990 (1988) (denying leave to file bill of complaint where issue was being litigated in state court); *Alabama*, 291 U.S. at 292 (denying leave to file bill of complaint where Alabama “fail[ed] to show” that the issues it sought to raise “may not, or indeed will not,” be pressed by the private party “directly concerned”).

Iowa and Montana have no persuasive response. They argue that there is no alternative forum in which they may sue respondent States regarding the merger because they “cannot intervene” in the underlying lawsuit. Br. 15 (citing 28 U.S.C. § 1251(a)). That is incorrect. If they intervened in the district court, Iowa and Montana would “not seek relief against” respondents—and thus would not implicate this Court’s exclusive jurisdiction under 28 U.S.C. § 1251(a).

Mississippi v. Louisiana, 506 U.S. 73, 78 n.2 (1992).⁴ Rather, they would seek a judicial order concluding that the proposed merger between two private companies comports with the Clayton Act. *E.g.*, Compl. ¶ 91 (seeking “prompt . . . adjudication of the merger”). The relief that Iowa and Montana seek here distinguishes this case from *Louisiana v. Mississippi*, 516 U.S. 22 (1995). *See e.g.*, Br. 15. *Louisiana* involved “relief in [a] quiet title action to one State against the other,” 516 U.S. at 23-24—in other words, a land dispute “concerning boundaries,” Shapiro et al., *Supreme Court Practice* § 10.2 (11th ed. 2019), the prototypical concern of original actions.

States routinely intervene in district court litigation without offending this Court’s exclusive jurisdiction—as Iowa and Montana surely know, given that they have intervened in other recent cases adverse to States. *See, e.g.*, Mot. to Intervene, *California v. U.S. Postal Serv.*, No. 26-cv-13917 (D. Mass. Aug. 27, 2026), Dkt. No. 32 (Montana moving to intervene in litigation against California and other States); *Texas v. United States*, 945 F.3d 355, 374 n.12 (5th Cir. 2019) (noting that Iowa intervened to defend a federal statute in a lawsuit initiated by Texas). Iowa and Montana make no effort to distinguish those cases.

In any event, the relevant question is not whether *Iowa* and *Montana* can sue elsewhere; it is whether there is an “alternative forum in which *the issue tendered* can be resolved.” *Mississippi*, 506 U.S. at 77 (emphasis added). If Iowa and Montana’s argument

⁴ *See also South Dakota v. Ubbelohde*, 330 F.3d 1014, 1025–1026 (8th Cir. 2003) (“The Supreme Court’s exclusive jurisdiction under 28 U.S.C. § 1251(a) applies only when one state seeks relief from another state.”); *Georgia v. U.S. Army Corps of Engineers*, 302 F.3d 1242, 1256 n.11 (11th Cir. 2002) (similar).

were correct, the existence of an alternative forum would never be relevant to this Court’s decision whether to exercise original jurisdiction in a dispute between two States. *But see, e.g., Arizona*, 425 U.S. at 797. And here, the question of the merger’s lawfulness is undisputedly teed up in the lawsuits pending in the district court.

b. Even setting aside the obvious alternative forum in which the issues presented here may be litigated, the claims advanced by Iowa and Montana do not implicate the kind of sovereign interests that warrant original jurisdiction. The Court’s “[o]riginal jurisdiction is for the resolution of *state* claims, not private claims.” *South Carolina v. North Carolina*, 558 U.S. 256, 277 (2010) (Roberts, C.J., concurring in the judgment in part and dissenting in part). But here, “the nature of the interest of the complaining State,” *Mississippi*, 506 U.S. at 77, is defending the private interests of Paramount and Warner Bros.—two large businesses that are already defending (and are best positioned to defend) those interests.

Iowa and Montana’s proposed complaint confirms the predominance of those private interests. For instance, the complaint alleges that “[t]wo large businesses are paralyzed, unable to plan, invest, or take any strategic action because they do not know whether they will be one company or two next year,” Compl. ¶ 5 (emphasis added), and that this “uncertainty” harms “[e]very decision a *business* could make—whether investment, hiring, firing, strategic direction, pricing, licensing, or something else,” *id.* ¶ 60 (emphasis added). Referring to the “hard costs” of respondent States’ suit, Iowa and Montana claim that “Paramount is paying Warner Bros. \$7 million *per day* beginning in October” under the terms of the merger agreement. *Id.*

¶ 63.⁵ As to the “soft costs,” Iowa and Montana allege that “Warner Bros. is frozen, unable to make strategic decisions,” *id.* ¶ 64, while Paramount will face “[q]uestions about financing the deal, interest rates, and its ability to invest in its new platform,” *id.* ¶ 66. These business-related harms are not remotely close to the type of sovereign interests that have historically led the Court to exercise original jurisdiction. *See Kansas v. Colorado*, 533 U.S. 1, 8 (2001) (“[T]he State must show a direct interest of its own and not merely seek recovery for the benefit of individuals who are the real parties in interest.”).

Iowa and Montana argue that the alleged harms to these companies “reach Plaintiff States’ economies.” Compl. ¶ 61. The same could be said of any civil enforcement action seeking injunctive relief, penalties, or damages from a corporation—or any law resulting in costs to businesses. Yet this Court has repeatedly declined to exercise original jurisdiction to address allegations that private economic actors were burdened by another State’s laws or actions. *See, e.g., Arizona v. California*, 589 U.S. 1199 (2020); *Missouri v. California*, 586 U.S. 1065 (2019); *Arizona v. New Mexico*, 425 U.S. at 795-798. Otherwise, States could rou-

⁵ Iowa and Montana’s characterization of these fees is also inaccurate. The parties’ agreement does not require any payments beginning in October. Rather, the price that Paramount must pay to Warner Bros. shareholders *at closing* is calculated in a manner that reflects the time value of money: a \$31 per share baseline price plus a prorated \$0.25 for every 90-day quarter beginning September 30, 2026, through closing. *See* Dkt. 204-3 at 106, 108. This aligns with the economic principle that \$110 billion in 2027 is worth slightly less than \$110 billion in 2026. Paramount offered the ticking fee to win a bidding war against Netflix to acquire Warner Bros. *See* Dkt. 213 at 8.

tinely volunteer to litigate the personal claims of private entities, in the first instance. *But see Pennsylvania v. New Jersey*, 426 U.S. 660, 665 (1976).

Maryland v. Louisiana, 451 U.S. 725, 737-739 (1981), is not to the contrary. See Compl. ¶ 62. There, Louisiana sought to impose a tax on natural gas brought into Louisiana, the majority of which was ultimately sold to out-of-state consumers. *Maryland*, 451 U.S. at 728-731. Maryland and other plaintiff States challenged the tax, and Louisiana argued as a threshold matter that the plaintiff States did not have standing because the tax fell on pipeline companies. *Id.* at 735-736. The Court rejected that argument, reasoning that the tax was “clearly intended to be passed on to the ultimate consumer” of the gas and that plaintiff States themselves were “substantial consumers of natural gas.” *Id.* at 736. Accordingly, the Court concluded that the plaintiff States were “directly affected in a ‘substantial and real’ way” by the tax. *Id.* at 737. Iowa and Montana allege nothing comparable.⁶

Iowa and Montana also suggest that they face a sovereign injury because respondent States “ha[ve] assumed authority to decide, for the Nation and for them, a question of national economic policy.” Compl. ¶ 73. The real threat to “quasi-sovereign interests” (Compl. ¶ 80) comes from the proposed complaint itself. Iowa and Montana want to prevent other sovereign States from enforcing federal antitrust laws. But Congress made the judgment that any one of the

⁶ Nor have Iowa or Montana supported the allegation that the economic injuries are “substantial” in their States. *Maryland*, 451 U.S. at 737. Neither Paramount nor Warner Bros. is incorporated or based in Iowa or Montana, Dkt. 1, ¶¶ 32, 33, and they do not allege that there are “tens of thousands” of Paramount and Warner Bros. employees *in their States*, Compl. ¶ 61.

States—not to mention private parties—may sue for “injunctive relief . . . against threatened loss or damage by violation of the antitrust laws.” 15 U.S.C. § 26. Iowa and Montana’s disagreement with the respondent States’ evaluation of the merits is not a basis to invoke this Court’s original jurisdiction.

Iowa and Montana contend that the district court proceedings may leave this Court “insufficient time to address the important issues in this case,” causing sovereign harms. Br. 16. They thus propose that the Court “appoint a special master to hold expedited proceedings.” *Id.* It is not clear why Iowa and Montana believe a newly-appointed special master would be able to proceed more quickly than a district court already familiar with this matter. In any event, any timing concerns presented by the ordinary appellate and certiorari process provides no good reason for this Court to expand its original jurisdiction docket. The Court sparingly exercises original jurisdiction precisely because “as an appellate tribunal” it is “ill-equipped for the task of factfinding” and because every case in which it does so “reduc[es] the attention” to the appellate matters “as to which [it is] the primary overseer[.]” *Ohio v. Wyandotte Chems. Corp.*, 401 U.S. 493, 498 (1971).

II. THE PROPOSED CLAIMS ARE MERITLESS

Another reason to deny Iowa and Montana leave to move forward with their proposed complaint is that their claims are far from “clearly sufficient to call for a decree in” their favor. *Alabama*, 291 U.S. at 291.

1. Iowa and Montana’s complaint presents a threshold question about whether they have invoked any viable cause of action. They do not appear to rely on the Clayton Act as the basis for their claims. Most

original suits call for the Court to fashion a form of federal common law to resolve water or boundary disputes between States, *see Oregon v. Corvallis Sand & Gravel Co.*, 429 U.S. 363, 375 (1977), or invoke the equivalent of common-law causes of action for violations of a contract, *e.g.*, *Kansas v. Nebraska*, 574 U.S. 445, 455-456 (2015). Here, Iowa and Montana point to the Declaratory Judgment Act (*e.g.*, Compl. ¶ 76), but that statute does not by itself create a federal cause of action. *Skelly Oil v. Phillips Petroleum Co.*, 339 U.S. 667, 671 (1950). Nor do Iowa and Montana explain how a suit to enjoin another State’s antitrust lawsuit under a congressionally authorized statute resembles the traditional causes of action that have been pursued by States in original actions.

2. The nature of the merits question underlying Iowa and Montana’s request for declaratory and injunctive relief also disfavors review by this Court in the first instance. Their complaint includes two claims: (1) that respondent States cannot maintain their antitrust suit because other national and international entities declined to challenge the Paramount-Warner Bros. merger and because the suit is allegedly “political[ly]” motivated (Compl. ¶¶ 78-79, 88-89), and (2) that the merger does not violate Section 7 of the Clayton Act (*id.* ¶¶ 80-81, 91).

As to the first claim, it is derivative of their view that the merger is lawful. *E.g.*, Compl. ¶¶ 78, 88. In any case, Congress authorized “[a]ny person, firm, corporation, or association”—including any State—to sue to enforce Section 7 of the Clayton Act. 15 U.S.C. § 26; *see supra* pp. 1, 12-13. That authority to sue does not depend on whether the United States, other States, or foreign agencies agree that the challenged merger is

anticompetitive. Nor does it turn on any alleged motivation for bringing such a suit; a Section 7 action will rise or fall on the merits of whether the challenged merger is likely to substantially lessen competition, as adjudicated by the federal courts.⁷

Iowa and Montana’s claim that the merger does not violate Section 7 also lacks merit, as respondent States would demonstrate, if it were necessary, at trial in the district court. Indeed, the district court granted a temporary restraining order, reasoning that respondent States “ma[de] a strong showing that the [merger] will substantially lessen competition” and that, by contrast, Paramount and Warner Bros.’ “proof . . . d[id] not establish that the merger would not substantially lessen competition.” Dkt. 141 at 6. The merits question presents a fact-intensive inquiry that is better resolved through the actions initiated in district court and ultimately subject to this Court’s certiorari jurisdiction after appellate review.

⁷ To set the record straight: respondents sued because the merger is likely to harm each respondent State’s consumers, workers, and economy. *See* Dkt. 1 ¶ 16. The fact that respondent state officials have also expressed concern about the federal government’s motivations for not challenging the merger (*see* Compl. ¶¶ 41-55) does not suggest that respondents are acting out of any improper political beliefs.

CONCLUSION

The motion for leave to file a bill of complaint should be denied.

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