

JUL 3 1963

JOHN F. DAVIS, CLERK

IN THE

Supreme Court of The United States

OCTOBER TERM, 1962

NO. 14 ORIGINAL

STATE OF LOUISIANA,

Plaintiff,

versus

STATE OF MISSISSIPPI, ET AL.,

Defendants,

RESPONSE OF HUMBLE OIL & REFINING CO.

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RESPONSE OF HUMBLE OIL & REFINING CO.

Comes now HUMBLE OIL & REFINING COMPANY and in response to the Motion For Leave To File Complaint And For Stay Order filed by the State of Louisiana respectfully states:

1. This Respondent is the Defendant in the action presently pending in the United States District Court, Western Division of the Southern District of Mississippi, entitled "Joseph S. Zuccaro, et al., vs. Humble Oil & Refining Company," Civil Action No. 1011, which action is referred to in said Motion For Leave To File Complaint And For Stay Order.

2. The civil action aforesaid involves an issue of the boundary between the States of Louisiana and Mississippi

at a certain location in the Mississippi River and no decision in said Civil Action would be binding on said States and res adjudicata as to them in the absence of a judicial determination of said boundary by the Supreme Court of the United States in an original action therein instituted; therefore, Respondent concedes that the Motion To File Complaint in No. 14 Original, October Term, 1962, is appropriate and that original and exclusive jurisdiction is vested in the Supreme Court of the United States to decide the boundary issue in an action filed by the State of Louisiana against the State of Mississippi and private parties thereto.

3. Substantial rights are involved and such rights can effectively be resolved in the United States Supreme Court. The controversy is real and justiciable.

WHEREFORE, Respondent enters no objection to the granting of said Motion of the State of Louisiana.


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M. M. ROBERTS
of Counsel for
Humble Oil & Refining Co.

PROOF OF SERVICE

The undersigned, of counsel for HUMBLE OIL AND REFINING COMPANY, and a member of the Bar of the Supreme Court of the United States, does hereby certify that on the 1 day of July, 1963, he served copies of the foregoing Response of Humble Oil and Refining Company by depositing the same in the United States Post Office with first class postage prepaid, addressed to:

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