FILED

MAY 31 1962

JOHN F. DAVIS, CLERK

IN THE

## Supreme Court of the United States

October Term, 1961.

No. 13 Original.

STATE OF TEXAS,

Plaintiff,

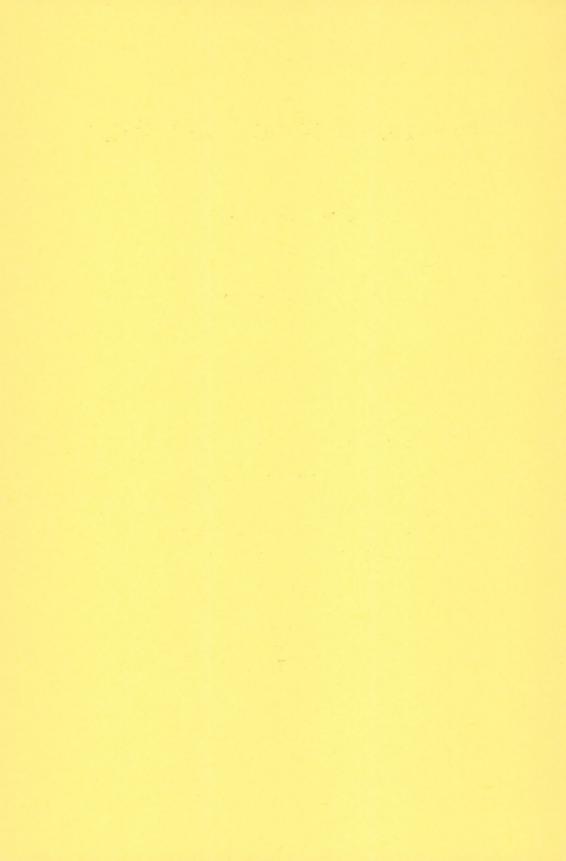
v.

STATE OF NEW JERSEY, ET AL.,

Defendants.

RESPONSE OF DEFENDANT, SUN OIL COMPANY, TO PLAINTIFF'S MOTION FOR LEAVE TO FILE BILL OF COMPLAINT.

Henry A. Frye,
Pepper, Hamilton & Scheetz,
2001 Fidelity-Philadelphia Trust Bldg.,
Philadelphia 9, Penna.,
Attorney for Defendant, Sun Oil
Company, 1608 Walnut Street,
Philadelphia 3, Penna.



## Supreme Court of the United States.

OCTOBER TERM, 1961.

No. 13 Original.

STATE OF TEXAS,

Plaintiff,

v.

STATE OF NEW JERSEY, ET AL.,

Defendants.

## RESPONSE OF DEFENDANT, SUN OIL COMPANY TO PLAINTIFF'S MOTION FOR LEAVE TO FILE BILL OF COMPLAINT.

In accordance with the order of the Court entered May 14, 1962, Defendant, Sun Oil Company, by its attorney, respectfully responds to the prayer for temporary injunction contained in subparagraph (4) of Paragraph XIX of the Complaint attached to Plaintiff's Motion for Leave to File Bill of Complaint, as follows:

(4) Defendant, Sun Oil Company, joins in the prayer of Plaintiff that a temporary injunction be issued restraining Defendant, Sun Oil Company, from paying, delivering or in any manner relinquishing the property identified in Plaintiff's Complaint or any other property to the Defendants, the State of New Jersey, the Attorney General of New Jersey, the State of Pennsylvania and the Attorney General of Pennsylvania or to any other person or entity, including Plaintiff, pending further orders of this Court.

Henry A. Frye,
Attorney for Defendant,
Sun Oil Company.

## PROOF OF SERVICE.

- I, Henry A. Frye, attorney for Defendant, Sun Oil Company, and a member of the Bar of the Supreme Court of the United States, hereby certify that on the Andrew day of May, 1962, I served copies of the foregoing Response of Defendant, Sun Oil Company, to Plaintiff's Motion for Leave to File Bill of Complaint on each of the other parties to this action by depositing copies in a United States post office or mail box, as certified mail with first class postage or air mail postage prepaid, and addressed to:
  - (1) Honorable Price Daniel Governor of Texas State Capitol Austin, Texas
  - (2) Honorable Will Wilson Attorney General of Texas Courts Building Austin 11, Texas
  - (3) Honorable Richard J. Hughes Governor of New Jersey State Capitol Trenton, New Jersey
  - (4) Honorable David D. Furman Attorney General of New Jersey State Capitol Trenton, New Jersey
  - (5) Honorable David L. Lawrence Governor of Pennsylvania State Capitol Harrisburg, Pennsylvania
  - (6) Honorable David Stahl Attorney General of Pennsylvania State Capitol Harrisburg, Pennsylvania

It is further certified that copies of the Response of Defendant, Sun Oil Company, to plaintiff's Motion for Leave to File Bill of Complaint have been served on the states named in Paragraph VI of Plaintiff's Complaint by depositing copies in a United States post office or mail box, as certified mail with first class postage or air mail postage prepaid and addressed to the Governors and Attorneys General of each of such states.

Henry A. Frye,

Attorney for Defendant,

Sun Oil Company.

