

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.*

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OCTOBER TERM, 1961.

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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 ~~29th~~ 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.

