

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA**

IN RE: AQUEOUS FILM-FORMING FOAMS PRODUCTS LIABILITY LITIGATION	MDL No. 2-18-mn-2873-RMG This Document Relates to: <i>City of Camden, et al. v. 3M Company,</i> Case No. 2:23-cv-03147-RMG
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SOVEREIGNS' MOTION TO INTERVENE

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Arizona, California, Colorado, Connecticut, Hawaii, Maine, Maryland, Massachusetts, Minnesota, New Hampshire, New Jersey, New Mexico, New York, Ohio, Pennsylvania, Rhode Island, Tennessee, Texas, Vermont, Wisconsin, as well as the District of Columbia, Puerto Rico, and the Commonwealth of the Northern Mariana Islands (collectively, the “Sovereigns”), by and through their respective Attorneys General and/or their respective counsel, will and hereby do move this Court, for the reasons set forth in their Memorandum of Law in Support of this Motion, for leave to intervene as of right in this action pursuant to Fed. R. Civ. P. 24(a). In the alternative, the Sovereigns seek permissive intervention pursuant to Fed. R. Civ. P. 24(b).

The grounds for this motion are as follows:

1. The Sovereigns satisfy each requirement to intervene as of right under Rule 24(a)(2). The motion is timely, the Sovereigns have significant protectable interests in this action, denial of the Motion would impair the Sovereigns’ ability to protect those interests, and the Sovereigns’ interests are not adequately protected by the parties to *City of Camden, et al. v. 3M Company*, No. 2:23-cv-03147-RMG.
2. In the alternative, the Sovereigns should be granted permissive intervention pursuant to Rule 24(b) because the Motion is timely, the Sovereigns’ claims share common questions of law and fact with Plaintiffs’ claims in this action, and intervention will not result in undue delay or prejudice to the parties to *City of Camden, et al. v. 3M Company*, No. 2:23-cv-03147-RMG.

Dated: July 26, 2023

Respectfully submitted,

STATE OF ARIZONA
KRISTIN K. MAYES
Arizona Attorney General

State of Arizona

/s/ Curtis Cox

Curtis Cox

Assistant Attorney General

2005 N. Central Avenue

Phoenix, Arizona 85004

Telephone: (602) 542-7781

Environmental@azag.gov

THE PEOPLE OF THE STATE OF CALIFORNIA
ROB BONTA

Attorney General of California

EDWARD H. OCHOA (SBN 144842)

Senior Assistant Attorney General

JEREMY M. BROWN (SBN 269159)

Supervising Deputy Attorney General

NICHOLAS G. CAMPINS (SBN 238022)

BRENDAN J. HUGHES (SBN 333690)

Deputy Attorneys General

1515 Clay Street, 20th Floor

Oakland, CA 94612

Telephone: (510) 879-0801

Fax: (510) 622-2270

Email: Nicholas.Campins@doj.ca.gov

/s/ Nicholas G. Campins

NICHOLAS G. CAMPINS

Deputy Attorney General

Attorneys for the People of the State of California, ex rel.

Rob Bonta, Attorney General of California

STATE OF COLORADO

PHILIP J. WEISER

ATTORNEY GENERAL

/s/ Heather Kelly

PHILIP J. WEISER, Attorney General

LESLIE EATON

HEATHER KELLY

CARRIE NOTEBOOM

First Assistant Attorneys General

Ralph L. Carr Judicial Center

1300 Broadway, 10th Floor
Denver, CO 80203
Telephone: (720) 508-6000
FAX: (720) 508-6040
*Counsel of Record

STATE OF CONNECTICUT

WILLIAM TONG

Attorney General

/s/ Matthew I. Levine

Matthew I. Levine

Deputy Associate Attorney General

Christopher Patrick Kelly

Assistant Attorney General

165 Capitol Avenue

Hartford, CT 06106

Telephone: 860-808-5052

Email: Matthew.Levine@ct.gov

Christopher.Kelly@ct.gov

DISTRICT OF COLUMBIA

BRIAN L. SCHWALB

Attorney General for the District of Columbia

JENNIFER C. JONES

Deputy Attorney General

Public Advocacy Division

ARGATONIA D. WEATHERINGTON

Chief, Social Justice Section

By: /s/ Wesley Rosenfeld

WESLEY ROSENFELD

Assistant Attorney General

LAUREN CULLUM

Special Assistant Attorney General

Office of the Attorney General for the District of Columbia

400 Sixth Street NW, 10th Floor

Washington, D.C. 20001

Tel: 202.368.2569

wesley.rosenfeld1@dc.gov

lauren.cullum@dc.gov

EDELSON PC

By: /s/ Jimmy Rock

JIMMY ROCK

1255 Union St NE, 7th Floor

Washington, D.C. 20002

Tel: 202.270.4777

jrock@edelson.com

STATE OF HAWAII

ANNE E. LOPEZ

Attorney General

/s/ Wade H. Hargrove III

WADE H. HARGROVE, III

Deputy Attorney General

465 S. King Street, #200

Honolulu, Hawaii 96813

(808) 587-3050

Wade.H.Hargrove@hawaii.gov

STATE OF MAINE

AARON M. FREY

ATTORNEY GENERAL

s/ Matthew F. Pawa

Matthew F. Pawa

Benjamin A. Krass

Seeger Weiss LLP

1280 Centre Street, Suite 230

Newton Centre, MA 02459

(617) 641-9550

MPawa@seegerweiss.com

BKrass@seegerweiss.com

Scott Boak

Robert Martin

Assistant Attorneys General

6 State House Station

Augusta, Maine 04333

(207) 626-8566

(207) 626-8897

Scott.Boak@maine.gov

Robert.Martin@maine.gov

Kyle J. McGee

Viola Vetter

Jason H. Wilson

Grant & Eisenhofer, P.A.

123 Justison Street

Wilmington, DE 19801

(302) 622-7000

kmcgee@gelaw.com

vvetter@gelaw.com

STATE OF MARYLAND
ANTHONY G. BROWN
Attorney General of Maryland

/s/ Patricia V. Tipon

PATRICIA V. TIPON

Attorney No. 0806170244

JULIE KUSPA

Attorney No. 0912160009

MATTHEW ZIMMERMAN

Attorney No. 8005010219

Assistant Attorneys General

Office of the Attorney General

1800 Washington Boulevard, Suite 6048

Baltimore, Maryland 21230

patricia.tipon@maryland.gov

matthew.zimmerman@maryland.gov

julie.kuspa@maryland.gov

(410) 537-3061

(410) 537-3943 (facsimile)

ADAM D. SNYDER

Attorney No. 9706250439

Assistant Attorney General

Office of the Attorney General

301 West Preston Street, Suite 1101

Baltimore, Maryland 21201

adam.snyder1@maryland.gov

(410) 767-1409

COMMONWEALTH OF MASSACHUSETTS

ANDREA JOY CAMPBELL

Attorney General

/s/ Nancy E. Harper

NANCY E. HARPER

**Assistant Attorney General and Chief, Environmental
Protection Division**

I. ANDREW GOLDBERG

LOUIS DUNDIN

JILLIAN RILEY

Assistant Attorneys General

OFFICE OF THE ATTORNEY GENERAL

One Ashburton Place, 18th Floor

Boston, Massachusetts 02108

(617) 727-2200

(617) 727-9665 (facsimile)

betsy.harper@mass.gov

andy.goldberg@mass.gov
louis.dundin@mass.gov
jillian.riley@mass.gov
Attorneys for Plaintiff Commonwealth of Massachusetts

**STATE OF MINNESOTA
OFFICE OF THE ATTORNEY GENERAL
KEITH ELLISON, ATTORNEY GENERAL**

/s/ Peter N. Surdo
Special Assistant Attorney General
Office of the Minnesota Attorney General
445 Minnesota Street
Suite 1400
St. Paul, Minnesota 55101
peter.surdo@ag.state.mn.us
Phone: (651) 757-1061

STATE OF NEW HAMPSHIRE

By its attorney,
JOHN M. FORMELLA,
ATTORNEY GENERAL
/s/ Christopher G. Aslin
Christopher G. Aslin, NH Bar #18285
Senior Assistant Attorney General
Environmental Protection Bureau
NEW HAMPSHIRE DEPT. OF JUSTICE
33 Capitol Street
Concord, NH 03301
Tel: (603) 271-3650
christopher.g.aslin@doj.nh.gov

**STATE OF NEW JERSEY
MATTHEW J. PLATKIN**

Attorney General
By: */s/ Gwen Farley*
GWEN FARLEY
Deputy Attorney General
Division of Law
Environmental Enforcement &
Environmental Justice Section
Hughes Justice Complex
25 Market Street, 7th Floor
P.O. Box 093
Trenton, NJ 08625-0093
Telephone: (609) 376-2740
Gwen.Farley@law.njoag.gov

**STATE OF NEW MEXICO
RAÚL TORREZ
ATTORNEY GENERAL**

/s/ William Grantham

William Grantham
Assistant Attorney General
408 Galisteo Street
Santa Fe, NM 87501
wgrantham@nmag.gov
Phone: (505) 717-3520

**STATE OF NEW YORK
LETITIA JAMES
ATTORNEY GENERAL**

/s/ Muhammad Umair Khan

Muhammad Umair Khan
Senior Advisor & Special Counsel
Umair.Khan@ag.ny.gov
Philip Bein
Mihir Desai
Assistant Attorneys General
Philip.Bein@ag.ny.gov
Mihir.Desai@ag.ny.gov
Office of the New York Attorney General
28 Liberty St.
New York, NY 10005
(212) 416-6685

**OFFICE OF THE ATTORNEY GENERAL
COMMONWEALTH OF THE NORTHERN
MARIANA ISLANDS**

/s/ Keisha Blaise

Keisha Blaise
Assistant Attorney General
keisha_blaise@cnmioag.org
Hon. Juan A. Sablan Memorial Bid., Fl. 2
Caller Box 10007, Capitol Hill
Saipan, MP 96950
Telephone: (670) 237-7500

**STATE OF OHIO
ATTORNEY GENERAL DAVE YOST**

By: /s/ Kyle J. McGee

Kyle J. McGee
Viola Vetter

Jason Wilson
Grant & Eisenhofer P.A.
123 Justison Street
Wilmington, Delaware 19801
Tel.: (302) 622-7000
kmcgee@gelaw.com
vvetter@gelaw.com
jwilson@gelaw.com
Attorneys for State of Ohio

**COMMONWEALTH OF PENNSYLVANIA
MICHELLE A. HENRY
ATTORNEY GENERAL**

/s/ James A. Donahue, III

James A. Donahue, III
First Deputy Attorney General
Pennsylvania Office of Attorney General
Strawberry Square
Harrisburg, PA 17120
717-787-3391
jdonahue@attorneygeneral.gov

***FOR THE COMMONWEALTH OF PUERTO RICO*
DOMINGO EMANUELLI HERNÁNDEZ
SECRETARY OF JUSTICE**

DEPARTMENT OF JUSTICE OF PUERTO RICO

By: /s/ Guarionex Diaz Martinez
GUARIONEX DÍAZ MARTÍNEZ

Assistant Secretary
Department of Justice
PO Box 9020192
San Juan, PR 00902-0192
Tel. 787.721.2900
gdiaz@justicia.pr.gov

**STATE OF RHODE ISLAND,
PETER F. NERONHA
ATTORNEY GENERAL**

By Its Attorneys,

/s/ Alison Hoffman

ADI GOLDSTEIN (Bar No. 6701)
MIRIAM WEIZENBAUM (Bar No. 5182)
SARAH W. RICE (Bar No. 10588)
ALISON HOFFMAN (Bar No. 9811)
DEPARTMENT OF THE ATTORNEY GENERAL
150 South Main Street

Providence, RI 02903
Tel. (401) 274-4400
agoldstein@riag.gov
mweizenbaum@riag.gov
srice@riag.gov
ahoffman@riag.gov

JONATHAN SKRMETTI (BPR No. 31551)
ATTORNEY GENERAL AND REPORTER
STATE OF TENNESSEE

/s/ Sohnia Hong

Sohnia W. Hong (BPR No. 17415)
Deputy Attorney General
Amanda E. Callihan (BPR No. 035960)
Senior Assistant Attorney General
Office of the Tennessee Attorney General
Environmental Division
P.O. Box 20207
Nashville, Tennessee 32707
Sohnia.Hong@ag.tn.gov
Amanda.Callihan@ag.tn.gov

STATE OF TEXAS
ANGELA COLMENERO
PROVISIONAL ATTORNEY GENERAL

/s/ Katie B. Hobson

KATIE B. HOBSON
Assistant Attorney General
State Bar No. 24082680
BRITTANY WRIGHT
Assistant Attorney General
State Bar No. 24130011
KELLIE E. BILLINGS-RAY
Deputy Chief
State Bar No. 24042447
Environmental Protection Division
P. O. Box 12548, MC-066
Austin, Texas 78711-2548
Tel: (512) 463-2012
Katie.Hobson@oag.texas.gov
Brittany.Wright@oag.texas.gov
Kellie.Billings-Ray@oag.texas.gov

STATE OF VERMONT
CHARITY R. CLARK
ATTORNEY GENERAL

/s/ Laura B. Murphy

Laura B. Murphy
Assistant Attorney General
109 State Street
Montpelier, VT 05609-1001
(802) 828-3186
laura.murphy@vermont.gov

Matthew F. Pawa
Benjamin A. Krass
Seeger Weiss LLP
1280 Centre Street, Suite 230
Newton Centre, MA 02459
(617) 641-9550
MPawa@seegerweiss.com
BKrass@seegerweiss.com

Kyle J. McGee
Viola Vetter
Jason H. Wilson
Grant & Eisenhofer, P.A.
123 Justison Street
Wilmington, DE 19801
(302) 622-7000
kmcgee@gelaw.com
vvetter@gelaw.com

STATE OF WISCONSIN
JOSHUA L. KAUL
Attorney General of Wisconsin
/s/ Bradley J. Motl
BRADLEY J. MOTL
Assistant Attorney General
State Bar #1074743
SARAH C. GEERS
Assistant Attorney General
State Bar #1066948
Wisconsin Department of Justice
Post Office Box 7857
Madison, Wisconsin 53707-7857
(608) 267-0505 (Motl)
(608) 266-3067 (Geers)
(608) 267-2778 (Fax)
motlbj@doj.state.wi.us
geerssc@doj.state.wi.us

CERTIFICATE OF SERVICE

I hereby certify that on July 26, 2023, I electronically filed the foregoing document with the Clerk of the Court using the Court's CM/ECF system, which shall send notice to all counsel of record.

Dated: July 26, 2023

/s/ Nicholas G. Campins
NICHOLAS G. CAMPINS