

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

**IN RE: AQUEOUS FILM-FORMING
FOAMS PRODUCTS LIABILITY
LITIGATION**

MDL No. 2873

Master Docket No. 2:18-mn-2873

This Document Relates to:

*The People of the State of California, ex rel.
Rob Bonta, Attorney General of California
v. 3M Company et al.*

Case No. 2:23-cv-01531-RMG

**STATEMENT IN SUPPORT OF THE PEOPLE OF CALIFORNIA’S
MOTION FOR TEMPORARY RESTRAINING ORDER
AND FOR PRELIMINARY INJUNCTION**

We, the States of Arizona, Arkansas, Colorado, Connecticut, Hawai’i, Maine, Maryland, Massachusetts, Minnesota, New Hampshire, New Mexico, Oregon, Pennsylvania, Rhode Island, South Carolina, Vermont, Washington, Wisconsin; the District of Columbia; the Commonwealth of Puerto Rico; the Counties of Los Angeles, California, Santa Clara, California, and King County, Washington; the City and County of San Francisco, California; and the Cities of Fresno, Los Angeles, and San Diego, California, Denver, Colorado, and Philadelphia, Pennsylvania by and through their respective attorneys general, county counsels, and city attorneys (collectively, “Supporting Plaintiffs”), hereby support the Motion for Temporary Restraining Order and for Preliminary Injunction (“Motion”) brought by the People of the State of California (“California”) against the DuPont Defendants.¹

¹ The DuPont Defendants include Corteva, Inc., E.I. du Pont de Nemours and Company (a/k/a EIDP, Inc. and referred to in California’s Motion as “Old DuPont”), the Chemours Company, the Chemours Company FC, LLC (“Chemours”), and DuPont de Nemours, Inc. (f/k/a DowDuPont Inc. and referred to in California’s Motion as “New DuPont”).

All the Supporting Plaintiffs have brought similar claims to those brought by California, and some also bring claims for fraudulent transfer.² California's Motion will benefit all MDL plaintiffs, including the undersigned Supporting Plaintiffs, by preventing Corteva from continuing the DuPont Defendants' continuous efforts to remove valuable assets from the reach of creditors and diminish the financial resources available to address PFAS-related harms. The Motion will preserve the availability of potential relief for the Supporting Plaintiffs' claims (and all plaintiffs' claims), including the availability of future abatement of toxic PFAS contamination across the United States, and protect public health and the environment.

We therefore support California's request that this Court, at a minimum (1) issue a temporary restraining order to restrain Corteva from effectuating the October 1 closing of the Vylor Spinoff, including pausing any asset transfers away from Corteva and forbidding any distributions, share repurchases, or other disposition of assets related to the Vylor Spinoff; and (2) issue an asset-freezing injunction for the duration of this MDL covering at least the estimated diminution in total assets Corteva will likely realize immediately following the Vylor Spinoff (roughly \$22 billion).³

² Minnesota supports the relief requested (although it has no pending claims against the DuPont entities addressed in California's Motion) to ensure assets remain available to Minnesota plaintiffs with claims.

³ By supporting California's Motion, the Supporting Plaintiffs do not assert affirmative relief and do not waive or otherwise limit any of their own claims, defenses, or rights with respect to the Vylor Spinoff or any other transaction or asset transfer by the DuPont Defendants, and expressly reserve all such rights, including the right to file separate claims and seek additional or different relief.

Respectfully submitted on this 14th day of September, 2026.

/s/ Ashley B. Campbell

Ashley B. Campbell

SHER EDLING LLP

100 Montgomery Street, Suite 1410

San Francisco, 94104

ashley@sheredling.com

STATE OF WISCONSIN

JOSHUA L. KAUL

Attorney General of Wisconsin

/s/ Bradley J. Motl

BRADLEY J. MOTL

Assistant Attorney General

Wisconsin Department of Justice

Environmental Protection Unit

P.O. Box 7857

Madison, WI 53707-7857

Tel. 608-267-0505

bradley.motl@wisdoj.gov

FOR THE CITY OF DENVER

/s/ David Steinberger

David Steinberger

Assistant General Counsel

DEN Legal Section

City and County of Denver

210 W. Colfax Avenue, Dept. 1207

Denver, CO 80202-5332

Telephone: (720) 913-3256

Fax: (720) 913-3180

david.steinberger@denvergov.org

FOR THE CITY OF FRESNO

MILLER & AXLINE

/s/ Justin Massey

Justin Massey

1050 Fulton Ave Ste 100

Sacramento, CA 95825

(916) 488-6688

jmassey@milleraxline.com

FOR THE CITY OF LOS ANGELES/s/ Jessica B. Brown

Hydee Feldstein Soto, City Attorney
Michael J. Bostrom, Chief Assistant City Attorney
Jessica B. Brown, Assistant City Attorney
Office of the Los Angeles City Attorney
201 N. Figueroa St., 13th Floor
Los Angeles, CA 90012
Telephone: (213) 978-1864
Fax: (213) 978-8779
hydee.feldsteinsoto@lacity.org
michael.bostrom@lacity.org
jessica.brown@lacity.org

FOR THE CITY OF PHILADELPHIA/s/ Monique Myatt Galloway

Monique Myatt Galloway
Acting City Solicitor
City of Philadelphia Law Department
1515 Arch Street, 17th Floor
Philadelphia, PA 19102
(215) 683-5003
Monique.Galloway@Phila.gov

FOR THE CITY OF SAN DIEGO/s/ Eric Laguardia

HEATHER FERBERT
KEVIN KING (SBN 309397)
ERIC LAGUARDIA (SBN 272791)
1200 3rd Avenue, Suite 1100
San Diego, California 92101
Tel.: (619) 236-6220
KBKing@sandiego.gov
ELaGuardia@sandiego.gov

FOR THE CITY AND COUNTY OF SAN FRANCISCO/s/ Nancy E. Harris

DAVID CHIU (SBN 189542)
San Francisco City Attorney
YVONNE R. MERÉ (SBN 173594)
Chief Deputy City Attorney
SARA J. EISENBERG (SBN 269303)
Chief of Complex & Affirmative Litigation
RONALD H. LEE (SBN 238720)
Assistant Chief of Complex & Affirmative
Litigation

NANCY E. HARRIS (SBN 197042)
Deputy City Attorney
Fox Plaza
1390 Market Street, 6th Floor
San Francisco, CA 94102-5408
Tel.: (415) 554-4700
Email: nancy.harris@sfcityatty.org

FOR THE COUNTY OF LOS ANGELES**OFFICE OF THE COUNTY COUNSEL**

/s/ Scott Kuhn

DAWYN R. HARRISON
SCOTT KUHN (SBN 190517)
ANDREA ROSS (SBN 179398)
JENNIFER MALONE (SBN 151421)
500 W. Temple Street, Room 648
Los Angeles, CA 90012

FOR THE COUNTY OF SANTA CLARA**OFFICE OF THE COUNTY COUNSEL
COUNTY OF SANTA CLARA**

/s/ Tony LoPresti

Tony LoPresti (SBN 289269)
County Counsel
Kavita Narayan (SBN 264191)
Chief Assistant County Counsel
Rajiv Narayan (SBN 334511)
Deputy County Counsel
70 West Hedding Street
East Wing 9th floor
San Jose, CA 95110
Tel.: (408) 299-5927
Rajiv.narayan@cco.sccgov.org

FOR KING COUNTY

/s/ Ethan Rogers

Ethan Rogers, WSBA #21132
Senior Deputy Prosecuting Attorney
King County Prosecutor's Office, Civil Division
516 Third Avenue, Suite 400
Seattle, WA 98104
Phone: (206) 477-1957
Fax: (206) 296-0191

**FOR THE COMMONWEALTH OF
MASSACHUSETTS**

**ANDREA JOY CAMPBELL
ATTORNEY GENERAL**

/s/ Louis Dundin

NANCY E. HARPER
Assistant Attorney General, Chief
LOUIS DUNDIN
Assistant Attorney General, Deputy Chief
I. ANDREW GOLDBERG
JILLIAN RILEY
Assistant Attorneys General
Environmental Protection Division
Office of the Attorney General
One Ashburton Place, 18th Floor
Boston, Massachusetts 02108
(617) 727-2200
betsy.harper@mass.gov
louis.dundin@mass.gov
andy.goldberg@mass.gov
jillian.riley@mass.gov

**FOR THE COMMONWEALTH OF
PENNSYLVANIA**

**OFFICE OF ATTORNEY GENERAL
DAVID W. SUNDAY, JR.
ATTORNEY GENERAL**

/s/ Cheryl P. Jacobs

Cheryl P. Jacobs
Senior Deputy Attorney General
Pennsylvania Office of Attorney General
1000 Madison Avenue Suite 310
Norristown, PA 19403
cjacobs@attorneygeneral.gov

**FOR THE COMMONWEALTH OF
PUERTO RICO**

/s/ Pablo Tufiño Soto

Pablo Tufiño Soto
Senior Assistant Attorney General
Office of Monopolistic Affairs
Department of Justice
P.O. Box 9020192
San Juan, PR 00902-0192
Tel. (787) 721-2900
ptufino@justicia.pr.gov

FOR THE DISTRICT OF COLUMBIA**BRIAN L. SCHWALB****Attorney General for the District of Columbia****COTY MONTAG****Deputy Attorney General****WILLIAM F. STEPHENS****Assistant Deputy Attorney General****JOANNA K. WASIK****Chief, Housing and Environmental Justice
Section***/s/ Wesley Rosenfeld*

WESLEY ROSENFELD [DC Bar# 1002428]

Assistant Attorney General

400 Sixth St. N.W.

Washington, D.C. 20001

(202) 368-2569 (phone)

Wesley.Rosenfeld1@dc.gov

FOR THE STATE OF ARIZONA**KRIS MAYES****Attorney General***/s/ Shelley D. Cutts*

SHELLEY D. CUTTS

Acting Section Chief Counsel

ALEXANDRIA GORDON

Assistant Attorney General

Environmental Enforcement Section

2005 N. Central Avenue

Phoenix, Arizona 85004

Telephone: (602) 542-8530

shelley.cutts@azag.gov

alexandria.gordon@azag.gov

FOR THE STATE OF ARKANSAS**TIM GRIFFIN****ATTORNEY GENERAL***/s/ Christine Cryer*

CHRISTINE CRYER

Deputy Attorney General

LYDIA H. HAMLET

Senior Assistant Attorney General

Consumer Protection Division

101 West Capitol Avenue

Little Rock, Arkansas 72201
(501) 682-2029
christine.cryer@arkansasag.gov
lydia.hamlet@arkansasag.gov

FOR THE STATE OF COLORADO

PHILIP J. WEISER, ATTORNEY GENERAL

/s/ Leslie A. Eaton

Leslie A. Eaton, Senior Counsel
Carrie Noteboom, Assistant Deputy Attorney
General
Heather Kelly, First Assistant
Attorney General
1300 Broadway, 10th Floor
Denver, CO 80203
Telephone: (720) 508-6000
FAX: (720) 508-6040
leslie.eaton@coag.gov carrie.noteboom@coag.gov
heather.kelly@coag.gov

FOR THE STATE OF CONNECTICUT

WILLIAM TONG
Attorney General

/s/ Matthew I. Levine

MATTHEW I. LEVINE
Deputy Associate Attorney General
Christopher P. Kelly
Michael W. Lynch
Kaelah M. Smith
Assistant Attorneys General
Office of the Attorney General
165 Capitol Avenue
Hartford, CT 06106
Tel. (860) 808-5250
matthew.levine@ct.gov

FOR THE 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
Tel. (808) 587-3050
Wade.H.Hargrove@hawaii.gov

FOR THE STATE OF MAINE**AARON M. FREY
ATTORNEY GENERAL***/s/ Matthew F. Pawa*

Matthew F. Pawa
Benjamin A. Krass
Pawa Law Group, P.C.
1280 Centre Street, Suite 230
Newton Centre, MA 02459
(617) 641-9550
Email: mp@pawalaw.com
bkrass@pawalaw.com

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

FOR THE 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
Tel. (410) 537-3061
Fax. (410) 537-3943
patricia.tipon@maryland.gov
matthew.zimmerman@maryland.gov
julie.kuspa@maryland.gov
ADAM D. SNYDER
Attorney No. 9706250439
Assistant Attorney General

Office of the Attorney General
301 West Preston Street, Suite 1101
Baltimore, Maryland 21201
Tel. (410) 767-1409
adam.snyder1@maryland.gov

FOR THE STATE OF MINNESOTA

**MINNESOTA ATTORNEY GENERAL'S
OFFICE**

/s/ Peter H. Surdo

Peter N. Surdo (0339015)
Special Assistant Attorney General
445 Minnesota Street, Suite 600
Saint Paul, MN 55101
Phone: 651.300.6637
peter.surdo@ag.state.mn.us

FOR THE STATE OF NEW MEXICO

**RAÚL TORREZ
ATTORNEY GENERAL**

/s/ Ether C. Jamison

Esther C. Jamison
Assistant Attorney General
New Mexico Department of Justice
Environmental Protection Bureau
408 Galisteo Street
Santa Fe, NM 87501
(505) 627-3474
ejamison@nmdoj.gov

**FOR THE STATE OF NEW
HAMPSHIRE**

/s/ Christopher G. Aslin

Christopher G. Aslin, Senior Assistant Attorney
General
Chief, Environmental Protection Bureau
N.H. Dept. of Justice
1 Granite Place South
Concord, NH 03301
Phone (603) 271-3679
Fax (603) 271-2110
christopher.g.aslin@doj.nh.gov

FOR THE STATE OF OREGON**DAN RAYFIELD**
Attorney General*/s/ Paul Garrahan*

PAUL GARRAHAN
Sr. Assistant Attorney General
Oregon Department of Justice
1162 Court Street NE
Salem, Oregon 97301-4096
(503) 947-4540
Paul.Garrahan@doj.oregon.gov

STATE OF RHODE ISLAND**PETER F. NERONHA**
Attorney General*/s/ Sarah W. Rice*

SARAH W. RICE
ALISON CARNEY
**DEPARTMENT OF THE ATTORNEY
GENERAL**
150 South Main Street
Providence, RI 02903
Tel. (401) 274-4400
srice@riag.gov
acarney@riag.gov

STATE OF SOUTH CAROLINA*/s/ Alan M. Wilson*

ALAN M. WILSON, Fed. ID# 10457
Attorney General of South Carolina
W. JEFFREY YOUNG, Fed ID# 6122
Chief Deputy Attorney General
C. HAVIRD JONES, JR., Fed. ID# 2227
Senior Assistant Deputy Attorney General
JARED Q. LIBET, Fed. ID# 9882
Assistant Deputy Attorney General
KRISTIN M. SIMONS, Fed. ID# 10167
Senior Assistant Attorney General

**OFFICE OF THE ATTORNEY GENERAL
OF SOUTH CAROLINA**

P.O. Box 11549
Columbia, South Carolina 29211
(803) 734-8044
SJones@scag.gov

KSimons@scag.gov

STATE OF VERMONT

CHARITY R. CLARK
Vermont Attorney General

/s/ Laura B. Murphy

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

STATE OF WASHINGTON

ROBERT W. FERGUSON
Washington State Attorney General

/s/ Timothy E. Allen

/s/ Junine So

TIMOTHY E. ALLEN, WA Bar No. 29415
JUNINE SO, WA Bar No. 58779
Assistant Attorneys General
Washington State Attorney General's Office
Environmental Protection Division
800 Fifth Ave., Ste. 2000
Seattle, WA 98104
Tel. (206) 464-7744
timothy.allen@atg.wa.gov
junine.so@atg.wa.gov