

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

COMMONWEALTH OF MASSACHUSETTS,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 19-12430-WGY
)	
EXXON MOBIL CORPORATION,)	
)	
Defendant.)	
)	

**PLAINTIFF COMMONWEALTH OF MASSACHUSETTS’S MOTION FOR REMAND
TO THE MASSACHUSETTS SUPERIOR COURT FOR SUFFOLK COUNTY**

Pursuant to 28 U.S.C. § 1447(c), the Plaintiff Commonwealth of Massachusetts (“Commonwealth”) respectfully moves the Court to enter an order remanding this action to the Massachusetts Superior Court for Suffolk County. As grounds for this motion, the Commonwealth states that removal was improper because the Commonwealth’s Complaint does not raise any federal claims and the Massachusetts state courts are the appropriate forum for adjudicating the Commonwealth’s exclusively state law claims. For the reasons set forth in the accompanying Memorandum of Law, the Commonwealth respectfully requests that the Court grant its Motion.

LOCAL RULE 7.1(A)(2) CERTIFICATION

Pursuant to Local Rule 7.1(a)(2), undersigned counsel for the Plaintiff Commonwealth certifies that counsel for the Commonwealth conferred with counsel for Defendant Exxon Mobil Corporation on December 20, 2019. Counsel for the Defendant represented that it does not consent to this Motion.

Respectfully Submitted,

COMMONWEALTH OF MASSACHUSETTS

By its attorneys,

MAURA HEALEY
ATTORNEY GENERAL

Christophe G. Courchesne,
BBO No. 660507
Chief, Environmental Protection Division
christophe.courchesne@mass.gov
Glenn Kaplan, BBO No. 567308
Chief, Insurance and Financial Services
Division
glenn.kaplan@mass.gov
Shennan Kavanagh, BBO No. 655174
Deputy Chief, Consumer Protection Division
shennan.kavanagh@mass.gov
I. Andrew Goldberg, BBO No. 560843
andy.goldberg@mass.gov
Timothy Reppucci, BBO No. 678629
timothy.reppucci@mass.gov
Assistant Attorneys General

/s/ Christophe G. Courchesne
Richard A. Johnston, BBO No. 253420
Chief Legal Counsel
richard.johnston@mass.gov
Melissa A. Hoffer, BBO No. 641667
Chief, Energy and Environment Bureau
melissa.hoffer@mass.gov
Matthew Q. Berge, BBO No. 560319
Senior Trial Counsel, Public Protection and
Advocacy Bureau
matthew.berge@mass.gov
James A. Sweeney, BBO No. 543636
State Trial Counsel
jim.sweeney@mass.gov

Dated: December 26, 2019

OFFICE OF THE ATTORNEY GENERAL
One Ashburton Place, 18th Floor
Boston, Massachusetts 02108
(617) 727-2200

CERTIFICATE OF SERVICE

I, Christophe G. Courchesne, certify that the foregoing document, which was filed on this day through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Christophe G. Courchesne
Christophe G. Courchesne