No. 22O158

Supreme Court of the United States

STATE OF ALABAMA, STATE OF ALASKA,
STATE OF FLORIDA, STATE OF GEORGIA,
STATE OF IDAHO, STATE OF IOWA, STATE OF KANSAS,
STATE OF MISSISSIPPI, STATE OF MISSOURI,
STATE OF MONTANA, STATE OF NEBRASKA,
STATE OF NEW HAMPSHIRE, STATE OF NORTH DAKOTA,
STATE OF OKLAHOMA, STATE OF SOUTH CAROLINA,
STATE OF SOUTH DAKOTA, STATE OF UTAH,
STATE OF WEST VIRGINIA, AND STATE OF WYOMING
Plaintiffs,

v.

STATE OF CALIFORNIA, STATE OF CONNECTICUT,
STATE OF MINNESOTA, STATE OF NEW JERSEY, AND
STATE OF RHODE ISLAND

REPLY BRIEF IN SUPPORT OF MOTION FOR LEAVE TO FILE BILL OF COMPLAINT

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REPLY BRIEF

California's "modest" (BIO.20) and "tradition[al]" (BIO.1) lawsuit blames many of America's largest oil companies for "global warming," demands billions of dollars in past and future damages, and aims to force them "to abate the massive public nuisance" and "mitigate future harm to the environment." App.6a-10a. Connecticut, Minnesota, New Jersey, and Rhode Island purport to wield similar powers.

There is no "misunderstanding" (BIO.19) the nature of these actions. Defendants claim their state laws can remedy "global warming" by taxing and regulating the traditional energy industry. It is simply not true that companies "can produce and sell as much fossil fuel as they [want] without incurring any additional liability." *Id.* Each suit advances a theory of harm that makes complete relief *impossible* without remedies that would reduce global emissions. Take California at its word: "What we're asking the court to do" is "[p]rohibit oil companies from engaging in further pollution."[1]

Defendants are free to seek a zero-carbon future within their borders, but "forcible abatement" beyond their borders is constitutionally "impossible." *Georgia v. Tenn. Copper Co.*, 206 U.S. 230, 237-38 (1907). For this reason, the Court has always viewed interstate emissions as a federal issue that demands federal resolution. *Illinois v. City of Milwaukee*, 406 U.S. 91, 104-07 (1972). Defendants call it a "zombie theory" (BIO.31), but reports of the death of federal common

[1] Governor Gavin Newsom, *People of the State of California v. Big Oil* (Sept. 16, 2023), https://perma.cc/DU9F-K22R/; *accord, e.g.*, App.201a-202a.

law were greatly exaggerated. *See Am. Elec. Power Co. v. Connecticut*, 564 U.S. 410, 420-23 (2011) (*AEP*). Tellingly, Defendants never explain how the displacement of federal common law by federal statutory law could grant them new powers to regulate interstate emissions under state law.

The Court should hear the claims of 19 States that allege imminent threats to their sovereignty and to their basic way of life. 19 States should not be left to wait and see what a judicially imposed "transition to alternative energy sources" might entail. BIO.5. The longer Defendants exercise such power, the greater the risks of severe harm to the energy industry, higher prices across the country, and lasting damage to every major sector of the economy for which energy is a crucial input. Compl. ¶¶12-34, 41-69. These are not the "personal claims of private entities." BIO.21.

19 States do not lightly invoke this Court's original jurisdiction; they do so because the threats are real, the constitutional violations are serious, and, having surrendered to this Court the power to settle their controversies, they have no other option.

I. The 19 Plaintiff States bring claims of the utmost "seriousness and dignity."

It is undisputed that Defendants demand damages and equitable relief for the alleged effects of global warming; that Defendants blame interstate emissions for global warming; and that Defendants blame traditional energy sources like coal, oil, and natural gas for causing such emissions. BIO.18-19. The sum of these propositions is a legal theory that assigns liability for wholly extraterritorial acts, including the sale and use of traditional energy products. By trying to collect on

that theory, Defendants assert the novel power to tax and regulate interstate emissions under state law. *See* Br.7-10; *accord* BIO.26 (conceding that California seeks relief for conduct in "California *and elsewhere*").

A. The assertion of such power creates an interstate controversy worthy of this Court's review. *Cf. Georgia*, 206 U.S. at 237-38. When Louisiana claimed the right to tax natural gas exports to offset its environmental costs, this Court decided claims brought by eight States. *Maryland v. Louisiana*, 451 U.S. 725 (1981). Likewise, when West Virginia sought to curtail natural gas exports, this Court heard two state suits and resolved them on the merits. *Pennsylvania v. West Virginia*, 262 U.S. 553 (1923).

Maryland and *Pennsylvania* should decide the motion at hand. *See* Br.2-3, 22-26. Defendants insist, "There is no similar threat here," BIO.17, and they might be right: In *Maryland*, the stakes were just millions of dollars; here, California alone threatens tens of *billions* of dollars in damages, App.182a. That's before "penalties, restitution, and disgorgement" and whatever it costs to "abate" and "mitigate" alleged global warming, which they say is accelerating. App.10a. The precise effects of such drastic relief may be "uncertain" (BIO.16), but it is basic economics that consumers, everyday Americans, will bear much of the burden. Compl. ¶¶48-50, 69 & n.56. Defendants argue these costs are not "direct" (BIO.16), but they are no less direct than the tax on companies in *Maryland*. 451 U.S. at 736. Defendants argue Plaintiffs are not "already suffering" (BIO.16), but *Pennsylvania* too involved "impending" harms, some of which would not be felt for "a few years," 262 U.S. at 593, 595.

B. Beyond the substantial economic harms to 19 States and their citizens, the Complaint raises three serious constitutional claims. Any state law that imposes liability and creates a remedy for *global* emissions and energy use violates horizontal federalism, the supremacy of federal law over interstate emissions, and the Commerce Clause.

Defendants disclaim such extraordinary powers, urging that their suits do not target emissions or the sale or use of traditional energy. *See, e.g.*, BIO.9, 18-20, 30. They accuse Plaintiffs of "cherry-picking" and constructing a "caricature" of their "modest" efforts to remedy "particular deception." BIO.19-20, 26. This argument is the crux of the opposition brief, and it fails.

These are not like "state lawsuits against tobacco companies." BIO.1. The alleged injuries have little to do with confusion felt by local consumers and everything to do with the global atmosphere: Defendants allege that emissions "accelerated climate change and exacerbated its harms," such as "weather events like wildfires, droughts, heat waves, and heavy rainstorms; sea-level rise and depleted fisheries; and worsened air quality." BIO.5. To be sure, Defendants allege local impacts too, but on their own telling, those impacts flow from *global* energy use, *global* emissions, and *global* warming: "Each state-court complaint at issue here seeks to impose liability … [for] conduct that reached that State and was intended to and did cause *increased consumption* of fossil fuel products, *thereby inflicting local harms* on that State." BIO.33 (emphasis added).

Indeed, each Defendant alleges injuries from global warming.[2] Each demands damages for the alleged effects of global warming,[3] and/or equitable relief, like abatement, restitution, and mitigation, to remedy the same.[4] Try as they might, Defendants cannot "hid[e] the obvious"; they seek "a global remedy for a global issue." *Minnesota v. Am. Petroleum Inst.*, 63 F.4th 703, 719 (8th Cir. 2023) (Stras, J., concurring); *see also City of New York v. Chevron*, 993 F.3d 81, 91-93 (2d Cir. 2021).

Defendants try to distinguish their "climate-deception litigation" from past litigation over emissions. BIO.23-25. The City of New York, for example, sought "compensation for local harms that result from fossil-fuel production." BIO.20 at n.8. But that is precisely the relief Defendants seek, *see supra* n.3, so they too must be seeking "to regulate green-house-gas emissions." BIO.20. It is Defendants who offer "a fundamental mischaracterization of the state-court actions." BIO.18. "Accurately understood," BIO.20, their actions violate the Constitution in three ways.

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[2] *See* App.150a-183a (California); App.246a-248a (Connecticut); App.336a-353a (Minnesota); App.380a-389a, 543a-566a (New Jersey); App.732a-751a (Rhode Island).

[3] *See, e.g.*, App.203a (California) (compensatory damages); App.605a (New Jersey) (compensatory and natural resource damages); App.780a (Rhode Island) (compensatory damages).

[4] *See, e.g.*, App.201a-02a (California) (abatement and other "equitable relief" to "prevent further pollution"); App.258a (Connecticut) (equitable relief including mitigation, adaptation, resiliency, and restitution); App.368a (Minnesota) (restitution and disgorgement); App.605a (New Jersey) (abatement and costs of abatement); App.780a (Rhode Island) (abatement).

1. Horizontal Separation of Powers

The horizontal separation of powers is fundamental tenet of our federalism. *See Nat'l Pork Producers Council v. Ross*, 598 U.S. 356, 376 (2023) (*NPPC*); Buckeye Inst. Amicus Br.3-7. Defendants castigate the principle as something "new and free-standing" (BIO.27), but the Constitution limits state power over "borders," "water rights," and "interstate compacts" through "implicit alterations" to State sovereignty. *Franchise Tax Bd. v. Hyatt*, 587 U.S. 230, 246 (2019). There is nothing "new" about the argument that interstate emissions are "inappropriate for state law to control" under the Constitution. *Id.*

Nevertheless, Defendants claim their laws *can* reach conduct "outside the State" that produces "injurious consequences within the State." *Id.* (quoting *Young v. Masci*, 289 U.S. 253, 258-59 (1933)). Applied to interstate gas emissions, this theory of state power is unlimited. Because gases "become well mixed in the atmosphere," *AEP*, 564 U.S. at 422, any person can be made liable for lightning in Minnesota. *Contra* BIO.18. This theory is wrong because it would make the limitation on a State's power over acts "outside [its] jurisdiction" quite trivial. *NPPC*, 598 U.S. at 375.

2. Exclusive Federal Authority Over Interstate Emissions

States cannot independently govern interstate gas emissions because the global atmosphere is shared. There must be a "uniform rule of decision." *Milwaukee,* 406 U.S. at 105 n.6, so the Court has applied federal law, not state law, to resolve the competing claims of states and private parties over shared resources. *See* Br.13-15.

Defendants again resort to denial, claiming to target "deceptive conduct," not "harms caused by interstate pollution." BIO.28. But the distinction makes no difference to the claim. Plaintiffs are not "free to pursue their own energy goals" (BIO.21) if their goals are effectively taxed and regulated by sister state laws. No amount of "artful pleading" can eliminate the "risk of conflict between states, which never 'agree[d] to submit'" to another's energy policy. *Minnesota*, 63 F.4th at 717, 718 (Stras, J., concurring). While Defendants say that protecting the public from "deceptive commercial conduct" is a "traditional state responsibility" (BIO.30), dictating the composition of the global atmosphere is not.

Defendants also suggest that they can regulate interstate emissions because federal common law in the area has been displaced by the Clean Air Act. BIO.29-31. This theory is badly mistaken, *see* Br.17-20, for the uniquely federal interests that call for federal law did not disappear "simply because Congress saw fit to displace a federal court-made standard with a legislative one." *City of New York*, 993 F.3d at 98.

3. Commerce Clause

States may regulate in ways that affect interstate commerce, but this case is not about the "ripple effects" from "state laws regulating the in-state sale" of goods. *NPPC*, 598 at 380, 390 (plurality op.). Defendants *do* target wholly extraterritorial acts, and the "connection" between those acts and their territory is tenuous at best. *Compare* BIO.33 *with* BIO.26 (admitting to making liable acts performed "*elsewhere*"). They seek relief based on extraterritorial (indeed global) emissions. And their harms would be identical

if nothing unlawful ever occurred within their jurisdictions. If the Commerce Clause's "negative command" means anything, *Okla. Tax Comm'n v. Jefferson Lines, Inc.*, 514 U.S. 175, 179 (1995), Defendants cannot regulate interstate commerce based on the effects of untraceable gas molecules produced thousands of miles away.

C. Plaintiffs have standing to bring these claims on their own behalf and on behalf of their citizens. By asserting extraterritorial power, Defendants have already violated State sovereignty. Compl. ¶¶42-44. And their suits pose specific and concrete threats. Compl. ¶¶45-69. The Court has consistently recognized that "regulation of a third party" can cause "downstream … economic injuries to others in the chain, such as … customers." *FDA v. All. for Hippocratic Med.*, 602 U.S. 367, 385 (2024). In a highly "predictable chain of events" (*id.*), massive taxation and regulation of energy companies will increase the cost to make, sell, and buy energy. *Cf. City of New York*, 993 F.3d at 93. That will directly harm Plaintiffs and their citizens. *See* Compl. ¶¶45-46, 48, 51-59, 69.

Defendants call this "speculation" (BIO.25), but they never offer their own account of what happens after extracting tens or hundreds of billions of dollars from the energy industry. Defendants cannot predict the effects of their own actions, yet somehow they can trace global weather patterns to specific companies.

II. The 19 Plaintiff States have no alternative forum adequate to hear their claims.

The Constitution and Congress have provided only one forum to decide this case. U.S. Const. art. III, §2; 28 U.S.C. §1251(a). In exchange for surrendering

their sovereign powers of self-protection, the States were guaranteed a forum in this Court. *See North Dakota v. Minnesota*, 263 U.S. 365, 373 (1923). An attempt to curtail access to crucial energy resources would be *casus belli* among fully independent nations. *See* Br.24-25. Forcing a State into another forum in that circumstance would be an affront to its dignity. *See California v. Arizona*, 440 U.S. 59, 66 (1979).

Defendants do not suggest that their sister States could defend their rights by intervening in the five state suits. Their proposal (BIO.11-12) is even less dignified: Leave these matters of state sovereignty and federalism to be litigated by private companies.

The Court has rejected this argument. In *Arizona v. New Mexico*, a "pending state-court action" was "an adequate forum" to litigate "the issues tendered," so the Court declined to hear the case. 425 U.S. 794, 797 (1976). But as the Court later explained, it was crucial that one of the parties to the state-court case was a political subdivision of Arizona, so the State was "actually being represented by a name party." *Maryland*, 451 U.S. at 728. Even where private parties raise "identical constitutional issues" in state court, they do not "directly represent[]" the States. *Id.*; *contra* BIO.13-14. Here, the state-court defendants have corporate interests not necessarily shared by Plaintiff States, who seek to vindicate their own constitutional rights, advance their own unique policy goals, and protect the welfare of their citizens. Compl. ¶¶40-69.

Even if the energy companies can raise some of the same constitutional concerns, Defendants still fail to identify a forum with "jurisdiction over the named parties … and where appropriate relief may be had."

Maryland, 451 U.S. at 740. Plaintiffs seek not only the termination of ongoing litigation—to the extent it violates their rights—but also declaratory and permanent injunctive relief prohibiting any attempts to restrict traditional energy usage in Plaintiff States. Compl. ¶¶36-37. No single state court has jurisdiction to provide that relief. *Cf. Georgia. v. Pennsylvania R.R.*, 324 U.S. 439, 466 (1945). And dismissal of any one of the ongoing cases would not provide permanent relief to Plaintiffs. *Cf. Maryland*, 451 U.S. at 728 n.19 (state court was an "imperfect forum" because it did not provide for temporary injunctive relief). There is no alternative forum where Plaintiffs can represent themselves and achieve complete relief.

III. There are no obstacles to the Court's exercise of original jurisdiction.

The abstention doctrine of *Younger v. Harris*, 401 U.S. 37 (1971), and the Anti-Injunction Act are not "knotty threshold issues" (BIO.23) in this case. Both *Younger* and the Anti-Injunction Act embody respect for States by permitting their courts to decide certain matters first. *Cf. Mitchum v. Foster*, 407 U.S. 225, 232-33, 243 (1972). But federal respect for States in controversies *among* States led the Framers "to open and keep open" this Court to resolve such disputes "in the first instance." *California*, 440 U.S. at 66. For that reason, this Court may exercise original jurisdiction in cases like this one.

A. Under the *Younger* doctrine, if a state forum provides "an adequate opportunity" to litigate federal claims, "proper respect for state functions" may require federal courts to abstain. *Sprint Commc'ns, Inc. v. Jacobs*, 571 U.S. 69, 77 (2013). But for disputes that

"would amount to *casus belli* if the States were fully sovereign," *Texas v. New Mexico*, 462 U.S. 554, 571 n.18 (1983), this Court is the proper forum, and it would disrespect a sovereign State to leave its fate in the hands of a potentially hostile co-equal. *See Chisholm v. Georgia*, 2 U.S. 419, 474 (1793) (rejecting the notion that States might "acquiesce in the measure of justice which another State might yield"). The States surrendered their political powers of war and diplomacy; the only dignified substitute was to open this Tribunal for judicial resolution of interstate conflicts. *See* Br.3-4, 24; *South Carolina v. Regan,* 465 U.S. 367, 396-99 (1984) (O'Connor, J., concurring).

Because States submitted to this Court's power to settle their disputes, *Younger*'s non-interference rationale is inapt. Moreover, *Younger* presumes a competent state forum, which does not exist for a case that satisfies this Court's standard for original jurisdiction. Finally, *Younger*'s application to original actions would permit States to evade judicial review by abusing sister States through judicial rather than executive or legislative means. Defendants here should not be effectively immune from Plaintiffs' claims because they first asserted extraordinary new powers in their state courts.

B. Similarly, the Anti-Injunction Act is no bar. Although this Court's "appellate jurisdiction is … subject to 'such Exceptions, and such Regulations as the Congress shall make,'" its "original jurisdiction is not." *Kansas v. Colorado*, 556 U.S. 98, 109-10 (2009) (Roberts, C.J., concurring). Congress's instruction not to grant an injunction to stay state-court proceedings cannot bar this Court from hearing a case the Constitution empowers it to decide. *Id.*; *Regan*, 465 U.S. at

397 (O'Connor, J., concurring) (collecting cases). By declining to apply the Act to restrict the Court's original jurisdiction, the Court can avoid placing its constitutionality in doubt. *See Gomez v. United States*, 490 U.S. 858, 864 (1989).

The Court has refused to apply the statute to bar injunctive relief sought by the United States on the ground that general language "divest[ing] pre-existing rights or privileges will not be applied to the sovereign without express words to that effect." *Leiter Minerals, Inc. v. United States*, 352 U.S. 220, 224 (1957). So too the Court should not divest the States of their preexisting right to seek complete relief in this Court. *See* U.S. Const. art. III, §2.

The Anti-Injunction Act also does not apply when injunctions are "expressly authorized." 28 U.S.C. §2283. That exception is satisfied by a "specific and uniquely federal right or remedy." *Mitchum*, 407 U.S. at 237. Congress and the Constitution created such a remedy by vesting this Court with exclusive jurisdiction over disputes among States. *See* Br.1, 26-27.

CONCLUSION

The Court should grant the motion.

Respectfully submitted,

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