

STATE OF RHODE ISLAND
PROVIDENCE, SC

SUPERIOR COURT

STATE OF RHODE ISLAND,

Plaintiff

v.

CHEVRON CORP.; CHEVRON USA, INC.; EXXON MOBIL CORP.; BP, PLC; BP AMERICA, INC.; BP PRODUCTS NORTH AMERICA, INC.; ROYAL DUTCH SHELL, PLC; MOTIVA ENTERPRISES, LLC; SHELL OIL PRODUCTS COMPANY, LLC; CITGO PETROLEUM CORP.; CONOCOPHILLIPS; CONOCOPHILLIPS COMPANY; PHILLIPS 66; MARATHON PETROLEUM CORP.; MARATHON PETROLEUM COMPANY, LP; SPEEDWAY, LLC; HESS CORP.; MARATHON OIL COMPANY; MARATHON OIL CORPORATION; LUKOIL PAN AMERICAS, LLC; GETTY PETROLEUM MARKETING, INC.; AND DOES 1 through 100, inclusive

Defendants.

C.A. No. PC-2018-4716

DEFENDANTS' JOINT MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION PURSUANT TO R.I. R. CIV. P. 12(b)(2)

Pursuant to R.I. R. Civ. P. 12(b)(2), Defendants¹ Chevron Corporation; Chevron U.S.A., Inc.; Exxon Mobil Corporation; BP Products North America Inc.; BP P.L.C.; BP America Inc.; Royal Dutch Shell, PLC; Motiva Enterprises, LLC; Shell Oil Products Company LLC; CITGO Petroleum Corporation; ConocoPhillips; ConocoPhillips Company; Phillips 66; Marathon Petroleum Corporation; Marathon Petroleum Company LP; Speedway, LLC; Hess Corp.; Marathon Oil Company; and Marathon Oil Corporation collectively move this Court to dismiss Plaintiff's complaint with prejudice for lack of personal jurisdiction. Defendants rely upon the

¹ All Defendants join this motion except Lukoil Pan Americas, LLC, which Plaintiff dismissed from this lawsuit, *see* Notice of Voluntary Dismissal, *Rhode Island v. Chevron Corp. et al.*, PC-2018-4716 (R.I. Super. Ct. Dec. 6, 2019), and Getty Petroleum Marketing, Inc., which filed bankruptcy years before Plaintiff filed this lawsuit and has never responded to the Complaint.

contemporaneously filed Memorandum of Law in Support of Defendants' Joint Motion to Dismiss for Lack of Personal Jurisdiction.

Dated: January 13, 2020

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CERTIFICATE OF SERVICE

I hereby certify that on January 13, 2020, I filed and served this document through the Rhode Island Judiciary's Electronic Filing System on all counsel who are registered for e-service. This document electronically served is available for viewing and/or downloading from the Rhode Island Judiciary's Electronic Filing System.

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