

STATE OF MINNESOTA  
COUNTY OF HENNEPIN

DISTRICT COURT  
FOURTH JUDICIAL DISTRICT

State of Minnesota, by its Attorney General,  
Lori Swanson, its Commissioner of Pollution  
Control, John Linc Stine, and its Commissioner  
of Natural Resources, Tom Landwehr,

Case Type: Other Civil  
Judge Kevin S. Burke  
Court File No. 27-CV-10-28862

Plaintiff,

vs.

3M Company,

Defendant.

**PLAINTIFF STATE OF MINNESOTA'S  
NOTICE OF MOTION  
AND MOTION  
TO AMEND COMPLAINT**

**TO ALL COUNSEL OF RECORD:**

**PLEASE TAKE NOTICE** that on December 1, 2017, before the Honorable Kevin S. Burke, in courtroom GC-C1059, at the Hennepin County District Court, 110 S 4th Street, Minneapolis, Minnesota, at 9:00 a.m., or as soon thereafter as counsel may be heard, Plaintiff State of Minnesota will bring the following motion.

**MOTION**

The State, through its undersigned counsel, hereby moves the Court for an order allowing the State to amend its complaint to assert punitive damages for the conduct alleged in the State's claims for negligence, trespass, and nuisance. In support of this motion, the State relies on its accompanying Memorandum, the supporting Affidavit of Christian J. Pistilli and exhibits thereto, and the files and pleadings on the record in this matter.

This motion is brought pursuant to Minn. R. Civ. P. 15.01 and is based upon all the files, records, and proceedings herein, including the memorandum of law to be filed and served in accordance with Minn. Gen. R. Prac. 115.04.

DATED: November \_\_, 2017

Respectfully submitted,

LORI SWANSON

Attorney General  
State of Minnesota

/s/

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ATTORNEYS FOR PLAINTIFF  
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**MINN. STAT § 549.211  
ACKNOWLEDGMENT**

The party on whose behalf the attached document is served acknowledges through the undersigned counsel that sanctions may be imposed pursuant to Minn. Stat § 549.211 (2010).

DATED: November \_\_\_\_, 2017

/s/ ALETHEA M. HUYSER  
ALETHEA M. HUYSER  
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**CERTIFICATE OF COMPLIANCE WITH  
MINN. GENERAL RULE OF PRACTICE 115.10**

In accordance with Minn. General Rule of Practice 115.10, Plaintiff State of Minnesota hereby certifies that counsel for Plaintiff State of Minnesota conferred orally and in writing with counsel for Defendant 3M Company in an attempt to resolve the dispute without the need for Court action.

DATED: November \_\_\_\_, 2017

/s/ ALETHEA M. HUYSER

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