

settle claim while determination by Kentucky court would be intrusive and could disrupt Ohio state tax administration, so dismissed on comity grounds).

D. Injunctions Against Extrastate Actions

[Add at the end of Note 4 on page 1077.]

See also In Re: Bair Hugger Forced Air Warming Devices Products Liab. Litig., 999 F.3d 534 (8th Cir. 2021) (applying relitigation exception of Anti-Injunction Act, which allows injunctions to prevent state litigation of a claim or issue previously decided by federal court).

End of Supplement