

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
LOUISIANA, ALEXANDRIA DIVISION

**Garrett Deglandon v. Judge Edwards, Rasallen Management Corp.,
and Magistrate Judge Perez-Montes**

Deglandon · No. 1:25-CV-00465 · Decided February 5, 2026

SUMMARY

The United States District Court for the Western District of Louisiana granted Rasallen Management Corporation’s motion for leave to file a third-party complaint against Data Furnishing Technologies LLC and Cameron Thompson. The court concluded that the proposed indemnification, breach of contract, and fraudulent misrepresentation claims fell within the scope of Federal Rule of Civil Procedure 14(a) and that the relevant impleader factors supported allowing the claims.

CASE DETAILS

COURT	United States District Court for the Western District of Louisiana, Alexandria Division
WRITING FOR THE COURT	Joseph H.L. Perez-Montes
JURISDICTION	United States District Court for the Western District of Louisiana
DECIDED	February 5, 2026
DOCKET	1:25-CV-00465
DISPOSITION	other
PROCEDURAL POSTURE	Defendant Rasallen Management Corporation moved for leave to file a third-party complaint against Data Furnishing Technologies LLC d/b/a The Income Agency and Cameron Thompson. The district court granted the motion and ordered the proposed third-party complaint filed as of August 28, 2025.
STANDARD OF REVIEW	A district court has wide discretion in deciding whether to grant leave to file a third-party complaint under Federal Rule of Civil Procedure 14(a)(1), subject to whether the proposed claim falls within Rule 14's scope and whether the relevant impleader factors favor permission.
PRECEDENTIAL VALUE	Unknown; memorandum order from a federal district court

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QUESTIONS PRESENTED

1. Whether Rasallen's proposed claims against TIA and Thompson fell within the scope of Federal Rule of Civil Procedure 14(a) because the third-party defendants might be liable to Rasallen for all or part of Deglandon's claims.
2. Whether the discretionary factors governing leave to implead favored permitting Rasallen to file its third-party complaint.

HOLDINGS

1. Rasallen's proposed indemnification, breach-of-contract, and fraudulent-misrepresentation claims against TIA and Thompson were sufficiently dependent on Deglandon's claims against Rasallen to qualify for impleader under Rule 14(a).
2. Leave to file the third-party complaint should be granted because the relevant factors favored impleader: there was no undue delay or prejudice, the claims did not appear substantively lacking, resolving the related claims together would promote judicial efficiency, and any additional complexity was outweighed by those benefits.

KEY QUOTATIONS

"The Court thus finds that the factors weigh in favor of impleader." (II. Law and Analysis)

"Because the balance of factors supports impleader, Rasallen's Motion for Leave to File Third-Party Complaint is GRANTED." (Conclusion)

FACTUAL BACKGROUND

Deglandon sued Rasallen for breach of contract arising from a Memorandum of Understanding concerning a credit line. Rasallen alleged that it contracted with TIA for services, paid TIA, and that TIA and Thompson failed to provide those services, thereby preventing Rasallen from providing the credit line to Deglandon. Rasallen sought indemnification if it were held liable to Deglandon, along with contract and tort damages, fees, costs, and losses associated with Deglandon's lawsuit.

PROCEDURAL HISTORY

Deglandon filed breach-of-contract claims in Louisiana state court on March 5, 2025. Rasallen removed the action to the Western District of Louisiana and later sought leave under Federal Rule of Civil Procedure 14(a) to implead TIA and Thompson on claims for indemnification, breach of contract, and fraudulent misrepresentation. The court granted leave after finding that the proposed claims were derivative of Deglandon's claims and that the relevant discretionary factors favored impleader.

DISPOSITION

other

CASES CITED

- 574 F.2d 848, 849-50 (5th Cir. 1978)
- 2014 WL 1788711, at *2 (W.D. La. 2014)
- 430 Fed. App'x 332, 335-36 (5th Cir. 2011)
- 2016 WL 8261711, at *1 (W.D. La. June 28, 2016)
- 734 F.2d 182, 184 (5th Cir. 1984)
- 2015 WL 5083617, at *1 (E.D. La. 2015)

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