

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
LOUISIANA

Quanda Edmond v. Venture Global LNG, Inc., et al.

Edmond · No. 25-1394 · Decided February 11, 2026

SUMMARY

The United States District Court for the Eastern District of Louisiana grants Quanda Edmond’s unopposed motion to modify the scheduling order and obtain leave to file a third amended complaint. Applying Federal Rules of Civil Procedure 16(b) and 15(a), the court finds good cause to permit the amendment after the scheduling deadline.

CASE DETAILS

COURT	United States District Court for the Eastern District of Louisiana
WRITING FOR THE COURT	Sarah S. Vance
JURISDICTION	United States District Court for the Eastern District of Louisiana
DECIDED	February 11, 2026
DOCKET	25-1394
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved unopposed to modify the scheduling order and obtain leave to file a third amended complaint after the amendment deadline had expired.
STANDARD OF REVIEW	When the scheduling-order amendment deadline has expired, the movant must first demonstrate good cause under Federal Rule of Civil Procedure 16(b); only then does the more liberal Rule 15(a) standard govern leave to amend.
PRECEDENTIAL VALUE	Unpublished district court order; precedential status unknown
PARTIES	Quanda Edmond v. Venture Global LNG, Inc., et al.

TOPICS

- motion to amend
- pleadings
- civil procedure
- commercial litigation

PRACTICE AREAS

- civil procedure
- commercial litigation

QUESTIONS PRESENTED

1. Whether the scheduling order should be modified under Federal Rule of Civil Procedure 16(b) to permit amendment after the deadline.
2. Whether plaintiff should be granted leave under Federal Rule of Civil Procedure 15(a) to file a third amended complaint.

HOLDINGS

1. When the deadline for amending pleadings has expired, a party must demonstrate good cause under Federal Rule of Civil Procedure 16(b) before the court applies the more liberal Rule 15(a) standard.
2. After finding good cause to modify the scheduling order, the court granted leave under the permissive standard of Federal Rule of Civil Procedure 15(a).

KEY QUOTATIONS

“If the deadline for amending pleadings in a case management order has expired, the movant must demonstrate good cause to modify the scheduling order under Federal Rule of Civil Procedure 16(b) before the more liberal standard of Federal Rule of Civil Procedure 15(a) applies to the court’s decision to grant or deny leave.”

“(1) the explanation for the failure to timely move for leave to amend; (2) the importance of the amendment; (3) potential prejudice in allowing the amendment; and (4) the availability of a continuance to cure such prejudice.”

FACTUAL BACKGROUND

The plaintiff sought to file a third amended complaint after the deadline for amending pleadings in the scheduling order had passed. The motion to modify the scheduling order and for leave to amend was unopposed. The court considered the explanation for the delay, the importance of the amendment, potential prejudice, and the availability of a continuance, and found good cause.

PROCEDURAL HISTORY

The case was pending in the Eastern District of Louisiana. After the scheduling-order deadline for amending pleadings expired, Edmond moved to modify the scheduling order and for leave to file a third amended complaint. The court found good cause under Rule 16(b), applied Rule 15(a)'s more liberal amendment standard, and granted the motion.

DISPOSITION

other

CASES CITED

- Shaw v. Restoration Hardware, Inc., 93 F.4th 284, 292 (5th Cir. 2024)
- Filgueira v. U.S. Bank Nat Ass'n, 734 F.3d 420, 422 (5th Cir.)

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