

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
LOUISIANA

Bourgeois v. Huntington Ingalls Incorporated, et al.

Civil Action No. 25-526, Section "G"(5) (E.D. La. June 8, 2026) · No. Civil Action No. 25-526 · Decided June 9, 2026

SUMMARY

The United States District Court for the Eastern District of Louisiana reviewed Plaintiffs’ objections to a magistrate judge’s order concerning production of employment records in an asbestos-exposure and mesothelioma action. The court found that limiting production to an employee personnel card was clearly erroneous because the card did not contain the relevant work-location information. The court granted the motion for review, reversed the limitation to the personnel card, and ordered production of documents reflecting the employee’s work locations and other relevant information, subject to the existing protective order.

CASE DETAILS

COURT	United States District Court for the Eastern District of Louisiana
WRITING FOR THE COURT	Nannette Jolivet Brown
JURISDICTION	United States District Court for the Eastern District of Louisiana
DECIDED	June 9, 2026
DOCKET	Civil Action No. 25-526
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiffs sought district-judge review of and objected to a magistrate judge's nondispositive discovery order under Federal Rule of Civil Procedure 72(a).
STANDARD OF REVIEW	Under 28 U.S.C. § 636(b)(1)(A) and Federal Rule of Civil Procedure 72(a), a district court may reverse a magistrate judge's ruling on a nondispositive pretrial matter only if it is clearly erroneous or contrary to law. A finding is clearly erroneous when, considering the record as a whole, it is implausible or leaves the district court with the definite and firm conviction that a mistake has been committed.
PRECEDENTIAL VALUE	Unpublished district-court order; persuasive only and not binding precedent beyond the case.

PARTIES

Errol J. Bourgeois, Sr., Mary Anne Bourgeois Richardson v.
Huntington Ingalls Incorporated

TOPICS

discovery dispute civil procedure personal injury torts

PRACTICE AREAS

civil procedure torts asbestos litigation discovery

QUESTIONS PRESENTED

1. Whether the magistrate judge's limitation of discovery to relevant portions of Joseph Bourgeois's personnel card was clearly erroneous when the personnel card did not contain the work-location information the magistrate judge had found relevant.
2. Whether the district court should modify the magistrate judge's discovery order to require production of documents reflecting Joseph Bourgeois's work locations and other responsive information identified as relevant, subject to the existing protective order.

HOLDINGS

1. A district court may reverse a magistrate judge's ruling on a nondispositive pretrial matter only when the ruling is clearly erroneous or contrary to law.
2. The magistrate judge's order was clearly erroneous to the extent it limited production to the personnel card because the personnel card did not contain the work-location information the magistrate judge had determined was relevant.

KEY QUOTATIONS

“The district judge can only reverse the magistrate judge's ruling if it finds the ruling “is clearly erroneous or contrary to law.”” (at 9)

“Because it is undisputed that the personnel card itself does not contain Joseph’s work-location information, limiting production to that document would not provide Plaintiff with the information the Magistrate Judge deemed relevant.” (at 10)

“IT IS FURTHER ORDERED that the Magistrate Judge’s February 11, 2026 Order” is REVERSED to the extent it limits production to the personnel card, and judgment is rendered ordering Avondale to produce any documents in its possession that reflect Joseph’s work locations and any other responsive information identified as relevant in the Magistrate Judge’s February 11, 2026 Order, subject to the existing protective order.” (at 10)

FACTUAL BACKGROUND

The case concerns alleged asbestos exposure suffered by Emanuel J. Bourgeois during employment with Huntington Ingalls Incorporated, formerly known as Avondale, and alleged exposure through family members

who worked there. Plaintiffs sought employment records for Emanuel's brother, Joseph Bourgeois, Jr., who also worked for Avondale, because the records could identify work locations and other information relevant to asbestos exposure. The magistrate judge ordered production of relevant portions of Joseph's personnel card, but the parties agreed that the personnel card did not contain Joseph's work-location information.

PROCEDURAL HISTORY

Plaintiffs filed an asbestos-exposure and wrongful-death action in Louisiana state court, which was removed to federal court. Plaintiffs moved to compel production of Joseph Bourgeois's employment file or, alternatively, his personnel card. The magistrate judge granted the motion in part, ordering production of relevant portions of the personnel card but not the entire employment file. Plaintiffs objected and sought review; the district court granted the motion, reversed the order to the extent it limited production to the personnel card, and ordered production of documents reflecting Joseph's work locations and other information previously identified as relevant.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The magistrate judge's February 11, 2026 order is reversed to the extent it limits production to the personnel card. Huntington Ingalls Incorporated must produce documents in its possession reflecting Joseph Bourgeois's work locations and any other responsive information identified as relevant in the magistrate judge's order, subject to the existing protective order.

CASES CITED

- *Palmisano, LLC. v. N. Am. Capacity Ins. Co.*, No. 19-cv-12755, 2020 WL 1429857, at *1 (E.D. La. Mar. 24, 2020)
- *Moore v. Ford Motor Co.*, 755 F.3d 802, 808 n.11 (5th Cir. 2014)
- *United States v. U.S. Gypsum Co.*, 333 U.S. 364, 395 (1948)
- *Yelton v. PHI, Inc.*, 284 F.R.D. 374, 375 (E.D. La. 2012)
- *Shaidnagle v. Adams Cnty., Miss.*, No. 5:13-cv-112, 2015 WL 72161, at *2 (S.D. Miss. Jan. 6, 2015)
- *Easley v. Cromartie*, 532 U.S. 234, 242 (2001)