

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
LOUISIANA

Monica S. Ramsey, et al. v. Independent Specialty Insurance
Company, et al.

Ramsey · No. No. 23-632 · Decided April 29, 2026

SUMMARY

The United States District Court for the Eastern District of Louisiana denied former counsel’s motion to intervene in a settled insurance dispute. The court held that the proposed intervenors, two limited liability law firms seeking attorney fees, failed to establish subject-matter jurisdiction because they did not allege the citizenship of their members or otherwise demonstrate complete diversity and the amount-in-controversy requirement. The motion was denied without oral argument.

CASE DETAILS

COURT	United States District Court for the Eastern District of Louisiana
WRITING FOR THE COURT	Donna Phillips Currault
JURISDICTION	United States District Court for the Eastern District of Louisiana
DECIDED	April 29, 2026
DOCKET	No. 23-632
DISPOSITION	other
PROCEDURAL POSTURE	Former counsel for the plaintiffs moved to intervene as of right under Federal Rule of Civil Procedure 24(a) after the plaintiffs and insurer resolved the remaining dispute. The district court denied the motion for lack of adequately established subject-matter jurisdiction.
STANDARD OF REVIEW	The court independently examined subject-matter jurisdiction sua sponte.
PRECEDENTIAL VALUE	nonprecedential district court order
PARTIES	Robinson Law Offices, LLC, Laporte Law Office, LLC v. Monica S. Ramsey, Roger Ramsey, Independent Specialty Insurance Company, Sedgwick Claims Management Services, Inc.

TOPICS

intervention

subject matter jurisdiction

civil procedure

insurance

attorney fees

PRACTICE AREAS

civil procedure

insurance

federal jurisdiction

attorney fees

QUESTIONS PRESENTED

1. Whether the former counsel could intervene as plaintiffs under Federal Rule of Civil Procedure 24(a) after the underlying dispute had been resolved.
2. Whether the court had subject-matter jurisdiction over the proposed intervention when the underlying action was based solely on diversity jurisdiction and the proposed intervenors failed to allege the citizenship of each member of their limited liability companies.
3. Whether supplemental jurisdiction under 28 U.S.C. § 1367 could support the proposed intervention despite the limitations in § 1367(b) concerning nondiverse persons seeking to intervene as plaintiffs in a diversity action.

HOLDINGS

1. A party seeking to intervene as a plaintiff in a civil action founded solely on diversity jurisdiction must establish the requirements of 28 U.S.C. § 1332, including complete diversity and the amount-in-controversy requirement, when supplemental jurisdiction under § 1367(b) would otherwise be inconsistent with § 1332.
2. A limited liability company seeking to intervene must specifically allege the citizenship of every one of its members, tracing citizenship through organizational layers as necessary; failure to do so prevents the court from determining whether complete diversity exists.

KEY QUOTATIONS

“Although the Court generally has the authority to grant a motion as unopposed, it is not required to do so.”
(at 2)

“Thus, a party seeking to intervene as plaintiff, such as Movants in this case, must meet both of § 1332(a)’s requirements for diversity of citizenship and amount in controversy.” (at 3)

“Movants ‘must specifically allege the citizenship of every member of every LLC.’” (at 3)

“Absent distinct and affirmative allegations of their own citizenship, it is impossible for the Court to determine whether the diversity exists.” (at 4)

FACTUAL BACKGROUND

Monica and Dale Ramsey sued their insurer and its third-party claims administrator for damages related to Hurricane Ida. After Sedgwick was dismissed, the Ramseys and Independent Specialty Insurance Company resolved the remaining dispute. Their former counsel asserted that the Ramseys had terminated a contingency-

fee relationship after approximately 20 months of services and costs, and sought intervention to recover fees and expenses.

PROCEDURAL HISTORY

Plaintiffs filed a diversity action against Independent Specialty Insurance Company and Sedgwick Claims Management Services, Inc. concerning Hurricane Ida-related contractual and extra-contractual damages. The court dismissed Sedgwick on January 7, 2026, and entered a conditional dismissal order on March 23, 2026, after the plaintiffs and ISIC resolved the remaining dispute. On April 13, 2026, the plaintiffs' former law firms moved to intervene to pursue attorney fees and costs allegedly arising from their contingency-fee representation.

DISPOSITION

other

CASES CITED

- Edward H. Bohlin Co., Inc. v. Banning Co., 6 F.3d 350, 356 (5th Cir. 1993)
- Villareal v. Smith, 201 F. App'x 192, 193 (5th Cir. 2006)
- United States v. Hays, 515 U.S. 737 (1995)
- Marshalls v. Gibson's Prods., Inc., 584 F.2d 667, 672 (5th Cir. 1978)
- Burciaga v. Deutsche Bank Nat'l Tr. Co., 871 F.3d 380, 384 n.4 (5th Cir. 2017)
- Adam Joseph Res. v. CNA Metals Ltd., 919 F.3d 856, 864 (5th Cir. 2019)
- Griffin v. Lee, 621 F.3d 380, 386-88 (5th Cir. 2010)
- Chambers Med. Found. v. Chambers, 236 F.R.D. 299, 302 (W.D. La. 2006), *aff'd sub nom. Chambers Med. Found. v. Petrie*, 221 F. App'x 349 (5th Cir. 2007)
- Samuels v. Twin City, 602 F. App'x 209, 211 (5th Cir. 2015)
- Vogt v. Wendy's Company, No. 23-1091, 2025 WL 445340, at *2-3 (E.D. La. Feb. 10, 2025)
- Causey v. State Farm, No. 16-9660, 2018 WL 2980066, at *2-3 (E.D. La. June 14, 2018)
- Lincoln Prop. Co. v. Roche, 546 U.S. 81, 89 (2005)
- McLaurin v. ABC Ins. Co., No. 24-2302, 2024 WL 4948692, at *2-3 (E.D. La. Dec. 3, 2024)
- Harvey v. Grey Wolf Drilling Co., 542 F.3d 1077, 1080 (5th Cir. 2008)
- Americold Realty Trust v. Conagra Foods, Inc., 577 U.S. 378, 381 (2016)
- Carden v. Arkoma Assocs., 494 U.S. 185, 195-96 (1990)
- Settlement Funding, L.L.C. v. Rapid Settlements, Ltd., 851 F.3d 530, 536 (5th Cir. 2017)
- Am. Motorists Ins. Co. v. Am. Emp. Ins. Co., 600 F.2d 15, 16 (5th Cir. 1979)
- Howery v. Allstate Ins. Co., 243 F.3d 912, 919 (5th Cir. 2001)
- Mullins v. TestAmerica, Inc., 564 F.3d 386, 397-98 (5th Cir. 2009)
- White v. New Orleans & Gulf Coast Ry. Co., No. 19-10389, 2021 WL 5387665, at *1 (E.D. La. Nov. 18, 2021)

- *Tolliver v. U-Haul Co. of Tex.*, No. 09-313, 2017 WL 9565856, at *2 (W.D. La. June 8, 2017), R&R adopted, 2018 WL 3040754 (W.D. La. June 19, 2018)
- *Getty Oil Corp. v. Ins. Co. of N. Am.*, 841 F.2d 1254, 1259 (5th Cir. 1988)
- *Exxon Mobil Corp. v. Allapattah Servs. Inc.*, 545 U.S. 546, 567 (2005)
- *State Nat'l Ins. Co. v. Yates*, 391 F.3d 577, 581 (5th Cir. 2004)

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