SUPREME COURT OF THE UNITED STATES

Chevron Oil Co. v. Huson

404 U.S. 97 (1971) · No. No. 70-11 · Decided December 6, 1971

SUMMARY

The Supreme Court held that the Outer Continental Shelf Lands Act requires application of the adjacent state's statute of limitations to personal-injury actions, rather than the admiralty doctrine of laches. It nevertheless affirmed the judgment remanding the case because the Louisiana one-year limitation, as required by Rodrigue v. Aetna Casualty & Surety Co., should not be applied retroactively to this pre-Rodrigue case. Justice Douglas concurred in the judgment but disagreed with the Court's reasoning.

CASE DETAILS

COURT	Supreme Court of the United States
WRITING FOR THE COURT	Justice Stewart; Justice Douglas
JURISDICTION	Federal
DECIDED	December 6, 1971
DOCKET	No. 70-11
DISPOSITION	affirmed
PROCEDURAL POSTURE	Huson brought a personal-injury action in federal district court under the Outer Continental Shelf Lands Act. The district court applied Louisiana's one-year statute of limitations and granted summary judgment to Chevron. The Fifth Circuit reversed and remanded for application of admiralty laches. The Supreme Court granted certiorari and affirmed the Fifth Circuit's judgment on the ground that Rodrigue v. Aetna Casualty & Surety Co. should not be applied retroactively to bar Huson's action.
STANDARD OF REVIEW	The Supreme Court reviewed the lower courts' construction of the Outer Continental Shelf Lands Act and the retroactive application of a judicial decision on certiorari.
PRECEDENTIAL VALUE	United States Supreme Court precedent; published majority opinion
PARTIES	Chevron Oil Co. v. Gaines Ted Huson

TOPICS

statutory interpretation | statute of limitations | admiralty | federalism | civil procedure

PRACTICE AREAS

admiralty | statutory interpretation | statute of limitations | civil procedure | federalism | personal injury

QUESTIONS PRESENTED

1. Whether the Outer Continental Shelf Lands Act requires application of the adjacent state's statute of limitations to a personal-injury action arising from an injury on a fixed structure on the Outer Continental Shelf.
2. Whether Rodrigue v. Aetna Casualty & Surety Co. should be applied retroactively to require application of Louisiana's one-year limitation period and thereby bar Huson's action.

HOLDINGS

1. Under the Outer Continental Shelf Lands Act as interpreted in Rodrigue, Louisiana's one-year statute of limitations applies to a personal-injury action arising on a fixed structure on the Outer Continental Shelf.
2. The Louisiana one-year statute of limitations, although applicable under Rodrigue, should not be applied retroactively to bar Huson's pre-Rodrigue action.

KEY QUOTATIONS

> *"Under § 1333 (a) (2) of the Act, "[s]tate law bec[omes] federal law federally enforced.""* (102)

> *"Congress specifically rejected national uniformity and specifically provided for the application of state remedies which demand state, not federal, statutes of limitation."* (105)

> *"We should not indulge in the fiction that the law now announced has always been the law and, therefore, that those who did not avail themselves of it waived their rights."* (107)

> *"Both a devotion to the underlying purpose of the Lands Act's absorption of state law and a weighing of the equities requires nonretroactive application of the state statute of limitations here."* (109)

FACTUAL BACKGROUND

Gaines Ted Huson suffered a back injury in December 1965 while working on an artificial island drilling rig owned and operated by Chevron Oil Co. on the Outer Continental Shelf off Louisiana. He allegedly did not discover the seriousness of the injury until several months later and filed suit in January 1968. At the time of the injury and filing, Fifth Circuit precedent treated admiralty law, including laches, as applicable under the Outer Continental Shelf Lands Act.

PROCEDURAL HISTORY

Huson was injured in December 1965 and filed suit in January 1968. The United States District Court for the Eastern District of Louisiana granted Chevron summary judgment after Rodrigue changed the governing interpretation of the Outer Continental Shelf Lands Act. The Fifth Circuit reversed and remanded, concluding that admiralty laches rather than Louisiana's statute of limitations governed. The Supreme Court affirmed the judgment, although it rejected the Fifth Circuit's construction of Rodrigue.

DISPOSITION

affirmed

REMAND INSTRUCTIONS

The case was left to proceed in the trial court without retroactive application of Louisiana's one-year statute of limitations.

CASES CITED

- Rodrigue v. Aetna Casualty & Surety Co., 395 U.S. 352 (1969)
- Pure Oil Co. v. Snipes, 293 F.2d 60 (5th Cir. 1961)
- Movible Offshore Co. v. Ousley, 346 F.2d 870 (5th Cir. 1965)
- Loffland Bros. Co. v. Roberts, 386 F.2d 540 (5th Cir. 1967)
- Auto Workers v. Hoosier Corp., 383 U.S. 696 (1966)
- Cope v. Anderson, 331 U.S. 461 (1947)
- Campbell v. Haverhill, 155 U.S. 610 (1895)
- Holmberg v. Armbrecht, 327 U.S. 392 (1946)
- McAllister v. Magnolia Petroleum Co., 357 U.S. 221 (1958)
- Linkletter v. Walker, 381 U.S. 618 (1965)
- Cipriano v. City of Houma, 395 U.S. 701 (1969)
- Allen v. State Board of Elections, 393 U.S. 544 (1969)
- England v. State Board of Medical Examiners, 375 U.S. 411 (1964)
- Levinson v. Deupree, 345 U.S. 648 (1953)
- Richards v. United States, 369 U.S. 1 (1962)
- Great Northern R. Co. v. Sunburst Oil & Refining Co., 287 U.S. 358 (1932)
- Mackey v. United States, 401 U.S. 667 (1971)
- Desist v. United States, 394 U.S. 244 (1969)