

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
LOUISIANA

In re LabMar Inland LLC, et al.

In re LabMar · No. No. 25-1049 · Decided April 27, 2026

SUMMARY

The Eastern District of Louisiana grants in part a motion to bifurcate proceedings in a maritime limitation action arising from an airboat allision with the M/V MANDY WHIPPLE. The court orders that limitation, liability, and allocation of fault be tried to the bench, while damages will be tried simultaneously to a jury in federal court. The court rejects bifurcation that would have required separate state-court trials because of overlapping evidence, inefficiency, delay, and the risk of inconsistent judgments.

CASE DETAILS

COURT	United States District Court for the Eastern District of Louisiana
WRITING FOR THE COURT	Jane Triche Milazzo
JURISDICTION	United States District Court for the Eastern District of Louisiana
DECIDED	April 27, 2026
DOCKET	No. 25-1049
DISPOSITION	other
PROCEDURAL POSTURE	Four claimants moved under Federal Rule of Civil Procedure 42(b) to bifurcate a maritime limitation action, asking the Court to try limitation and petitioners' liability in federal court and send damages and allocation of fault to state court. The Court granted the motion in part but rejected the requested federal/state division of proceedings.
STANDARD OF REVIEW	Abuse-of-discretion principles govern bifurcation under Federal Rule of Civil Procedure 42(b). The Court must determine whether separate trials would promote convenience, avoid prejudice, or expedite and economize, while ensuring that the separately tried issue is sufficiently distinct and separable to avoid injustice and preserving federal jury-trial rights.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Claimants Dell Jamora, Nicole Brockman, Richard Santos, and Deborah Santos v. LabMar Inland, LLC, American Inland Marine,

TOPICS

limitation of liability admiralty civil procedure injunctions

PRACTICE AREAS

admiralty civil procedure limitation of liability remedies

QUESTIONS PRESENTED

1. Whether the limitation action should be bifurcated so that limitation and petitioners' liability would be tried in federal court and damages and allocation of fault would be tried in state court.
2. Whether bifurcation of limitation, liability, allocation of fault, and damages would promote convenience, expedite and economize the proceedings, or avoid prejudice under Rule 42(b).
3. Whether the Court should instead separate limitation, liability, and allocation of fault from damages and try both phases in federal court, with the first phase to the bench and the damages phase to a jury.

HOLDINGS

1. The requested bifurcation was not appropriate because the limitation, liability, allocation-of-fault, and damages issues substantially overlap and separating them would create duplication, delay, expense, and a risk of inconsistent judgments.
2. The Court bifurcated limitation, liability, and allocation of fault from damages. The first group of issues will be tried to the bench, and damages will be tried simultaneously to a jury in this Court.
3. The petitioners' Rule 14(c) tender properly placed the claimants' claims against Airboat Adventures and Captain Helmer before the Court for adjudication.

KEY QUOTATIONS

“issue to be tried [separately] must be so distinct and separable from the others that a trial of it alone may be had without injustice.” (3)

“Courts have generally recognized that when issues [of limitation and the extent of damages] are intertwined and may require the same evidence, bifurcation of these issues . . . is not an appropriate remedy.” (4)

“Tension exists between the saving to suitors clause and the Limitation Act because the former affords suitors a choice of remedies, while the latter gives shipowners the right to seek limitation of their liability exclusively in federal court.” (6)

FACTUAL BACKGROUND

An airboat owned by Airboat Adventures, LLC and piloted by Captain Kevin Helmer struck the mooring line securing the M/V MANDY WHIPPLE to a tree on the bank of an intercoastal waterway. Passengers asserted negligence and unseaworthiness claims against the vessel owners, including claims arising from the death of

Carol Jean Jamora, severe injuries to Captain Helmer, and emotional damages suffered by other claimants. Airboat Adventures and Captain Helmer also filed claims in the limitation action, and the petitioners asserted claims against them and tendered them to the claimants under Rule 14(c).

PROCEDURAL HISTORY

LabMar Inland, LLC and American Inland Marine, LLC filed a limitation action arising from an allision involving the M/V MANDY WHIPPLE and an airboat. Claimants filed claims in the limitation action, while two claimant groups filed related state-court actions that were stayed pending resolution of the federal limitation proceeding. The Court considered the motion to bifurcate after briefing and oral argument on April 9, 2026, and ordered a different bifurcation procedure.

DISPOSITION

other

REMAND INSTRUCTIONS

The Court did not remand any claims to state court. It ordered that limitation, liability, and allocation of fault be tried to the bench, with damages tried simultaneously to a jury in the federal court.

CASES CITED

- Swofford v. B&W, Inc., 336 F.2d 406, 415 (5th Cir. 1964)
- Laitram Corp. v. Hewlett Packard Co., 791 F. Supp. 113, 115 (E.D. La. 1992)
- Willemijn Houdstermaatschaap BV v. Apollo Computer Inc., 707 F. Supp. 1429, 1433 (D. Del. 1989)
- In re Texas Petroleum Investment Co., No. CV 24-2344, 2026 WL 32230, at *3 (E.D. La. Jan. 6, 2026)
- In re Cooper Marine, Inc., No. CV 24-2778, 2025 WL 3022214, at *3-*4 (E.D. La. Oct. 29, 2025)
- In re Hedron Holdings, LLC, No. CV 21-2295, 2023 WL 6382609, at *2 (E.D. La. Sept. 29, 2023)
- In re Bertucci Contracting Co., No. 12-664, 2015 WL 114174, at *3 (E.D. La. Jan. 8, 2015)
- In re Tetra Applied Technologies L.P., 362 F.3d 338, 340 (5th Cir. 2004)
- Odeco Oil & Gas Co., Drilling Div. v. Bonnette, 74 F.3d 671, 674 (5th Cir. 1996)
- In re the Matter of Marquette Transportation Co. Gulf-Inland, LLC, No. 13-6351, 2014 WL 6389978, at *5 (E.D. La. Nov. 13, 2014)
- Langnes v. Green, 282 U.S. 531, 541 (1931)
- Lewis v. Lewis & Clark Marine, Inc., 531 U.S. 438 (2001)
- Brister v. A.W.I., Inc., 946 F.2d 350, 353 (5th Cir. 1991)

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