UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF LOUISIANA

ExxonMobil Oil Corporation, et al. v. Mars Oil Pipeline Company, LLC, et al.

ExxonMobil v. Mars Oil Pipeline · No. No. 25-2001 · Decided February 4, 2026

SUMMARY

The United States District Court for the Eastern District of Louisiana grants ExxonMobil Oil Corporation and Exxon Mobil Corporation leave under Federal Rule of Civil Procedure 15(a)(2) to file a first amended complaint. The court concludes that the motion was not untimely, that the proposed amendment would not cause undue prejudice, and that the futility issue should be addressed in connection with pending motions to dismiss. The amendment adds Halliburton Company, Halliburton Energy Services, Inc., and Wood Group USA, Inc., and modifies allegations concerning existing claims.

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	February 4, 2026
DOCKET	No. 25-2001
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiffs moved under Federal Rule of Civil Procedure 15(a)(2) for leave to file a first amended complaint adding defendants and clarifying allegations while defendants' Rule 12(b)(6) motions were pending.
STANDARD OF REVIEW	Leave to amend under Rule 15(a)(2) should be freely given when justice so requires; denial is reviewed for abuse of discretion. A court may deny leave for a substantial reason, including undue delay, bad faith, repeated failure to cure deficiencies, undue prejudice, or futility.
PRECEDENTIAL VALUE	unpublished district court order
PARTIES	ExxonMobil Oil Corporation, Exxon Mobil Corporation v. Mars Oil Pipeline Company, LLC, Shell Pipeline Company, LP, Amberjack

Pipeline Company, LOCAP LLC, Chevron U.S.A. Inc., TotalEnergies E&P USA, Inc., SLB OneSubsea, LOOP LLC

TOPICS

motion to amend | civil procedure | pleadings | motions to dismiss | commercial litigation

PRACTICE AREAS

civil procedure | commercial litigation | contracts | torts | products liability

QUESTIONS PRESENTED

1. Whether plaintiffs' motion for leave to amend was untimely because it was filed three days after the 21-day period for amendment as of right.
2. Whether a reply memorandum to a pending Rule 12(b)(6) motion could serve as an avenue for asserting new allegations or amending the complaint.
3. Whether defendants established a substantial reason under Rule 15(a)(2) to deny leave to amend based on undue delay, bad faith, repeated failure to cure deficiencies, undue prejudice, or futility.

HOLDINGS

1. The motion was not untimely under Rule 15(a)(2). The expiration of the 21-day period for amendment as of right merely required plaintiffs to obtain leave of court; because no scheduling order had established an amendment deadline, Rule 16(b)'s good-cause standard did not apply.
2. A reply memorandum is not an appropriate means to raise new allegations or amend a complaint; its scope is limited to addressing issues raised in the opposition.
3. Defendants did not establish a substantial reason to deny leave to amend. The proposed amendment involved no undue delay, bad faith, repeated failure to cure deficiencies, or undue prejudice, and the court would defer the disputed futility questions to the pending Rule 12(b)(6) proceedings.

KEY QUOTATIONS

> *"The scope of a reply memorandum, however, is limited to addressing issues raised in the opposition. Accordingly, a reply memorandum is not an appropriate avenue to raise new allegations or amend a complaint."* (Section II.B)

> *"For the foregoing reasons, the Court finds it lacks a substantial reason to deny Plaintiffs' request for leave to amend."* (Conclusion)

FACTUAL BACKGROUND

ExxonMobil sued entities involved in a pipeline system after receiving allegedly contaminated crude oil, asserting redhibition, Louisiana Products Liability Act, negligence, and breach-of-contract claims. Plaintiffs later learned that Halliburton entities, rather than Transocean Ltd., performed relevant well-completion services and that Wood Group USA, Inc., rather than John Wood Group plc, was the proper entity to name. Plaintiffs voluntarily dismissed the originally named entities and sought leave to add the proper entities and clarify allegations before a scheduling order had issued.

PROCEDURAL HISTORY

Plaintiffs filed claims arising from allegedly contaminated crude oil against entities involved in the design and operation of the pipeline system. After voluntarily dismissing Transocean, Ltd. and John Wood Group plc, plaintiffs sought to add Halliburton Company, Halliburton Energy Services, Inc., and Wood Group USA, Inc., and to amend certain allegations. Several defendants opposed the motion based on untimeliness, futility, prejudice, and the availability of reply briefing. The court granted leave to amend.

DISPOSITION

other

CASES CITED

- S&W Enters., L.L.C. v. SouthTrust Bank of Ala., NA, 315 F.3d 533, 535-36 (5th Cir. 2003)
- Magnolia Island Plantation, L.L.C. v. Whittington, 29 F.4th 246, 251-52 (5th Cir. 2022)
- Little Tchefuncte River Ass'n v. Artesian Util. Co., 155 F. Supp. 3d 637, 657 (E.D. La. 2015)
- Benefit Recovery, Inc. v. Donelon, 521 F.3d 326, 329 (5th Cir. 2008)
- Carroll v. Fort James Corp., 470 F.3d 1171, 1173-74 (5th Cir. 2006)
- Mayeaux v. La. Health Serv. & Indem. Co., 376 F.3d 420, 425, 427-28 (5th Cir. 2004)
- Stripling v. Jordan Prod. Co., 234 F.3d 863, 872-73 (5th Cir. 2000)
- United States ex rel. Spicer v. Westbrook, 751 F.3d 354, 367 (5th Cir. 2014)
- Gregory v. Mitchell, 634 F.2d 199, 203 (5th Cir. 1981)
- Avatar Expl., Inc. v. Chevron U.S.A., Inc., 933 F.2d 314, 320 (5th Cir. 1991)
- Smith v. EMC Corp., 393 F.3d 590, 594-96 (5th Cir. 2004)
- Foman v. Davis, 371 U.S. 178, 182 (1962)
- Carson v. Polley, 689 F.2d 562, 584 (5th Cir. 1982)
- Whitaker v. City of Hou., 963 F.2d 831, 836 (5th Cir. 1992)
- Parish v. Frazier, 195 F.3d 761, 763 (5th Cir. 1999) (per curiam)
- Price v. Pinnacle Brands, Inc., 138 F.3d 602, 607-08 (5th Cir. 1998)
- Neutron Depot, L.L.C. v. Bankrate, Inc., 798 F. App'x 803, 808 (5th Cir. 2020)
- St. Germain v. Howard, 556 F.3d 261, 264 (5th Cir. 2009)
- Torch Liquidating Tr. ex rel. Bridge Assocs. L.L.C. v. Stockstill, 561 F.3d 377, 391 (5th Cir. 2009)
- Herrmann Holdings Ltd. v. Lucent Techs. Inc., 302 F.3d 552, 566-67 (5th Cir. 2002)
- In re Am. Int'l Refinery, Inc., 676 F.3d 455, 467 & n.12 (5th Cir. 2012)
- C3PO Int'l, Ltd. v. DynCorp Int'l, L.L.C., 663 F. App'x 311, 314 (5th Cir. 2016)

- In re Vioxx Prods. Liab. Litig., No. 08-1633, 2008 WL 4681368, at *10 n.11 (E.D. La. Oct. 21, 2008), aff'd sub nom. Thanh Van Nguyen v. Hung Do, 579 F. App'x 284 (5th Cir. 2014)
- Ashcroft v. Iqbal, 556 U.S. 662, 678-79 (2009)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 555, 557, 570 (2007)
- Marucci Sports, L.L.C. v. Nat'l Collegiate Athletic Ass'n, 751 F.3d 368, 378 (5th Cir. 2014)
- City of Baton Rouge/E. Baton Rouge Par. v. Bank of Am., N.A., No. 19-725, 2020 WL 13033205, at *2-3 (M.D. La. Apr. 20, 2020)
- Medarc, LLC v. Aetna Health Inc., No. 20-3646, 2022 WL 743520, at *2 (N.D. Tex. Mar. 11, 2022)
- Landry v. Dep't of Child & Fam. Servs., No. 21-794, 2021 WL 2822344, at *2 (E.D. La. July 7, 2021)
