

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
LOUISIANA

Jerry LeJeune v. Taylor-Seidenbach, Inc., et al.

No. 23-2477 (E.D. La. Feb. 11, 2026) · No. No. 23-2477 · Decided February 11, 2026

SUMMARY

The United States District Court for the Eastern District of Louisiana denied Nabors Drilling Technologies USA, Inc.’s motion for summary judgment in an asbestos-liability action. The court held that the defendant had not shown that the dissolution of a predecessor entity, successor-liability principles, or the predecessor’s Chapter 11 bankruptcy and alleged discharge barred the plaintiffs’ claims. The court emphasized the absence of the bankruptcy reorganization plan and confirmation order from the summary-judgment record.

CASE DETAILS

COURT	United States District Court for the Eastern District of Louisiana
WRITING FOR THE COURT	Brandon S. Long
JURISDICTION	United States District Court for the Eastern District of Louisiana
DECIDED	February 11, 2026
DOCKET	No. 23-2477
DISPOSITION	other
PROCEDURAL POSTURE	Defendant Nabors Drilling Technologies USA, Inc. moved for summary judgment in an asbestos-liability action, arguing that corporate dissolution, lack of successor liability, and the bankruptcy of Loffland Brothers barred the plaintiffs' claims.
STANDARD OF REVIEW	Summary judgment is appropriate when the movant shows that there is no genuine dispute of material fact and that it is entitled to judgment as a matter of law. The court must draw reasonable inferences for the nonmoving party, may not weigh evidence or make credibility determinations, and must require the movant to support dispositive arguments with competent evidence.
PRECEDENTIAL VALUE	Unknown; district court order and reasons with no reported citation.

PARTIES

Jerry LeJeune, Tammy LeJeune, Anna LeJeune Clement, Hayden LeJeune v. Taylor-Seidenbach, Inc., et al., Nabors Drilling Technologies USA, Inc.

TOPICS

summary judgment

bankruptcy

civil procedure

commercial litigation

commercial

PRACTICE AREAS

civil procedure

bankruptcy

corporate law

asbestos litigation

successor liability

QUESTIONS PRESENTED

1. Whether the dissolution of Nabors Loffland Drilling Company barred plaintiffs' claims against NDUSA under Texas Business Organizations Code section 11.356.
2. Whether NDUSA established on summary judgment that it was not a successor corporation liable for claims arising from Loffland Brothers' operations.
3. Whether Loffland Brothers' Chapter 11 bankruptcy and alleged discharge barred plaintiffs' asbestos claims without production and analysis of the reorganization plan and confirmation order.

HOLDINGS

1. NDUSA failed to show that Texas's three-year post-dissolution limitation on suits against a dissolved corporation insulated the surviving successor entity from suit.
2. NDUSA failed to carry its summary-judgment burden to establish that it was not a successor corporation or that it did not assume liability for the claims.
3. NDUSA was not entitled to summary judgment on its bankruptcy-discharge defense because it failed to produce the reorganization plan and confirmation order and could not establish that plaintiffs' claims were discharged.

KEY QUOTATIONS

“Accordingly, IT IS ORDERED that Defendant NDUSA’s motion®? for summary judgment DENIED.”
(Section IV)

“In other words, the discharge of the entity’s debts is contingent on the terms of both the plan and the confirmation order; it is not an automatic, statutory discharge of all debts.” (Section III.C)

“Without the Reorganization Plan and Confirmation Order—which Plaintiffs requested in discovery and have long sought—the Court has insufficient summary- judgment evidence that Plaintiffs’ claims were discharged in bankruptcy.” (Section III.C)

FACTUAL BACKGROUND

Jerry LeJeune alleged asbestos exposure through his father's work for Loffland Brothers beginning in 1955 and his own work for the company from 1973 to 1980. Loffland Brothers entered Chapter 11 bankruptcy in 1985, and subsequent mergers and acquisitions ultimately resulted in Nabors Drilling Technologies USA, Inc. Plaintiff was diagnosed with mesothelioma in 2023 and died from the disease in 2025. NDUSA sought summary judgment based on corporate dissolution, lack of successor liability, and the alleged discharge of Loffland Brothers' liabilities, but did not produce the reorganization plan or confirmation order on which its bankruptcy argument depended.

PROCEDURAL HISTORY

Plaintiff sued NDUSA and other defendants in state court, and the action was removed to the Eastern District of Louisiana in July 2023. After Plaintiff Jerry LeJeune died, his heirs were substituted as plaintiffs. NDUSA moved for summary judgment without producing the bankruptcy plan or confirmation order. The court denied the motion because NDUSA failed to carry its summary-judgment burden and its evidence created genuine disputes concerning successor liability and bankruptcy discharge.

DISPOSITION

other

CASES CITED

- Celotex Corp. v. Catrett, 477 U.S. 317, 322-23 (1986)
- Vote.Org v. Callanen, 89 F.4th 459, 469 (5th Cir. 2023)
- Reeves v. Sanderson Plumbing Prods., Inc., 530 U.S. 133, 150 (2000)
- Antoine v. First Student, Inc., 713 F.3d 824, 830 (5th Cir. 2013)
- Boudreaux v. Swift Transp. Co., 402 F.3d 536, 540 (5th Cir. 2005)
- Int'l Shortstop, Inc. v. Rally's, Inc., 939 F.2d 1257, 1264-65 (5th Cir. 1991)
- In re La. Crawfish Producers, 852 F.3d 456, 462 (5th Cir. 2017)
- Lindsey v. Sears Roebuck & Co., 16 F.3d 616, 618 (5th Cir. 1994)
- Guillot ex rel. T.A.G. v. Russell, 59 F.4th 743, 750 (5th Cir. 2023)
- Cutting Underwater Techs. USA, Inc. v. Eni U.S. Operating Co., 671 F.3d 512, 517 (5th Cir. 2012)
- Altec Integrated Sols., Ltd. v. Poseidon Prods., Inc., 2025 WL 3096494, at *4 (E.D. Tex. May 27, 2025)
- Eubanks v. F.D.I.C., 977 F.2d 166, 170 (5th Cir. 1992)
- Integon Life Ins. Corp. v. Mableton–Booper Assocs. (In re Mableton–Booper Assocs.), 127 B.R. 941, 943 (Bankr. N.D. Ga. 1991)
- United Refining Co. v. Dorrior, 688 F. Supp. 3d 558, 561, 566 (S.D. Tex. Aug. 23, 2023)
- In re United Ref. Co., 2021 WL 160433, at *2, *7
- In re Chemtura Corp., 2016 WL 11651714, at *8 (Bankr. S.D.N.Y. Nov. 23, 2016)
- FCC v. NextWave Pers. Communs. Inc., 537 U.S. 293, 303 (2003)

