UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF LOUISIANA

Jamal Vaughn v. American Commercial Barge Line, LLC

Civil Action No. 18-7735, Section J(2) · No. Civil Action No. 18-7735; 2:18-cv-07735 · Decided March 17, 2026

SUMMARY

On remand from the Fifth Circuit, the United States District Court for the Eastern District of Louisiana recalculated Jamal Vaughn's future lost wage damages under the methodology required by Culver v. Slater Boat Co. The court reduced the prior future wage-loss award from $750,000 to $600,000, using a 33.04-year work-life estimate, a projected annual post-injury income of $28,733.12, and a 1.3% below-market discount rate. The court also held that post-judgment interest on the amended future wage-loss award accrued from the date of the initial judgment, June 22, 2023.

CASE DETAILS

COURT	United States District Court for the Eastern District of Louisiana
WRITING FOR THE COURT	Carl J. Barbier
JURISDICTION	United States District Court for the Eastern District of Louisiana
DECIDED	March 17, 2026
DOCKET	Civil Action No. 18-7735; 2:18-cv-07735
DISPOSITION	other
PROCEDURAL POSTURE	On remand from the United States Court of Appeals for the Fifth Circuit after the appellate court affirmed the district court's judgment except for the award of future wage loss, which it vacated and remanded for reconsideration.
STANDARD OF REVIEW	The court applied the Fifth Circuit's remand instructions and reviewed the damages calculation under the governing legal standards for future lost earnings and post-judgment interest.
PRECEDENTIAL VALUE	unpublished district court order; persuasive authority only
PARTIES	American Commercial Barge Line, LLC, Jamal Vaughn v. Jamal Vaughn, American Commercial Barge Line, LLC

TOPICS

admiralty damages appellate procedure remedies

PRACTICE AREAS

admiralty maritime personal injury damages post-judgment interest appellate remand

QUESTIONS PRESENTED

1. What amount of future lost earnings should be awarded on remand under the four-step methodology required by Culver II?
2. Whether post-judgment interest on the recalculated future lost-wage award accrued from the date of the original judgment or the date of the judgment entered on remand.

HOLDINGS

1. Applying Culver II, the court reduced the prior future-wage-loss award from $750,000 to $600,000. The court used a 33.04-year remaining work life, treated Vaughn's injury-time earnings as the base, used $28,733.12 as his expected post-injury annual earnings, and applied a 1.3% below-market discount rate without adding speculative wage increases attributable to factors other than inflation.
2. Post-judgment interest on the amended $600,000 future lost-wage award accrued from the date of the original judgment, June 22, 2023, because the Fifth Circuit substantially affirmed the original judgment and remanded only for recalculation of one component of damages.

KEY QUOTATIONS

> *"Calculating a plaintiff's future lost earnings "involves four steps: estimating the loss of work life resulting from the injury . . ., calculating the lost income stream, computing the total damage, and discounting that amount to its present value.""* (at 2-3)

> *"the fact-finder does not attempt to predict the wage increases the particular plaintiff would have received as a result of price inflation,"* (at 3)

> *"a plaintiff should not be allowed to "'double-dip' on his future wage loss claim,""* (at 4)

> *"the primary consideration is the degree to which the original judgment is ultimately upheld or invalidated, not the characterization of the district court's labors on remand."* (at 13)

FACTUAL BACKGROUND

ACBL employed Jamal Vaughn as a deckhand when, on January 19, 2018, the M/V Safety Explorer allided with another vessel on the Mississippi River, throwing Vaughn around the galley and injuring his head, neck, back, and shoulder. Medical and vocational evidence established that Vaughn could no longer perform the physical labor required of a deckhand and would instead be limited to light or medium physical labor at substantially lower wages. The district court used a 33.04-year remaining work-life estimate, a projected post-injury annual salary of $28,733.12, and a 1.3% below-market discount rate to calculate future wage loss.

PROCEDURAL HISTORY

Vaughn sued ACBL for injuries sustained in a vessel allision and sought, among other damages, past and future lost wages. After a June 2023 bench trial, the district court entered judgment awarding $750,000 for future lost earnings as part of a $1,879,298 total damages award. The Fifth Circuit affirmed the judgment on all issues except future wage loss, vacated that portion, and remanded with instructions to apply the Culver II calculation steps and explain the evidentiary basis for each step. On remand, the district court reduced future lost wages to $600,000 and ruled that post-judgment interest on that award accrued from the date of the original judgment.

DISPOSITION

other

REMAND INSTRUCTIONS

The court amended its prior judgment by reducing the future lost-wage award from $750,000 to $600,000 and ordered that post-judgment interest on the amended award accrue from June 22, 2023, the date of the first judgment.

CASES CITED

- Vaughn v. American Commercial Barge Line, L.L.C., No. 23-30494, 2025 WL 2945812, at *3-4 (5th Cir. Oct. 17, 2025)
- Culver v. Slater Boat Co. (Culver II), 722 F.2d 114, 117-22 (5th Cir. 1983)
- Sanders v. Weeks Marine, Inc., No. 23-7317, 2024 WL 4346515, at *7 (E.D. La. Sept. 30, 2024)
- ExxonMobil Corp. v. Electrical Reliability Services, Inc., 868 F.3d 408, 419-20 (5th Cir. 2017)
- Brooks v. United States, 757 F.2d 734, 740-41 (5th Cir. 1985)
- Vickers v. Chiles Drilling Co. (Vickers I), 822 F.2d 535, 540-41 (5th Cir. 1987)
- Vickers v. Chiles Drilling Co. (Vickers II), 882 F.2d 158, 159 (5th Cir. 1989)
- Masinter v. Tenneco Oil Co., 929 F.2d 191, 195 (5th Cir. 1991)
- Masinter v. Tenneco Oil Co., 934 F.2d 67, 68 (5th Cir. 1991)
- Masinter v. Marlin Drilling Co., Inc., 938 F.2d 536 (5th Cir. 1991)
- Masinter v. Tenneco Oil Co., No. 85-1919, 1991 WL 197154, at *1 (E.D. La. Sept. 11, 1991)