

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
LOUISIANA

Erica Dandry Constanza, et al. v. Sparta Insurance Company, et al.

Constanza · No. Civil Action No. 24-871 · Decided February 11, 2026

SUMMARY

The United States District Court for the Eastern District of Louisiana granted Huntington Ingalls Incorporated’s motion requiring plaintiffs to disclose the identities of all parties with whom they had settled. The court held that disclosure of settlement identities was appropriate to facilitate potential virile-share credits and reduce jury confusion, while the settlement amounts and contents remained subject to evidentiary limitations under Federal Rule of Evidence 408.

CASE DETAILS

COURT	United States District Court for the Eastern District of Louisiana
WRITING FOR THE COURT	Nannette Jolivet Brown
JURISDICTION	United States District Court for the Eastern District of Louisiana
DECIDED	February 11, 2026
DOCKET	Civil Action No. 24-871
DISPOSITION	other
PROCEDURAL POSTURE	Defendant Huntington Ingalls Incorporated, formerly known as Avondale, moved in limine for an order requiring plaintiffs to disclose the identities of all parties with whom they had entered into settlements. Liberty Mutual Insurance Company joined the motion. The district court granted the motion.
STANDARD OF REVIEW	The court recognized that whether settlement evidence may be admitted for a purpose other than proving or disproving the validity or amount of a disputed claim is within the trial court's discretion.
PRECEDENTIAL VALUE	nonprecedential

TOPICS

- discovery dispute
- motion in limine
- evidence
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the court should require plaintiffs to disclose the identities of all parties with whom they had entered into settlements in the action.
2. Whether Federal Rule of Evidence 408 barred the requested disclosure of the existence and identities of settlements.

HOLDINGS

1. Plaintiffs must immediately disclose to defendants the identities of all parties with whom they entered into settlements from the inception of the action through the conclusion of trial.
2. Rule 408 did not preclude an order requiring disclosure of the identities of settling parties because the motion did not seek to introduce settlement evidence to prove or disprove the validity or amount of the claim.

KEY QUOTATIONS

“Plaintiffs shall immediately disclose to Defendants the identities of all parties with whom Plaintiffs have entered into settlement at any time from the inception of the instant action through the conclusion of trial.”

“The instant motion is not evidentiary in nature. Instead, the motion seeks an order compelling production of certain information and documents.”

FACTUAL BACKGROUND

Plaintiffs allege that Michael P. Dandry, Jr. was exposed to asbestos and asbestos-containing products while employed by Avondale from June 1, 1971, through August 16, 1971. They contend that the exposure caused mesothelioma and other health effects, ultimately resulting in his death. Plaintiffs sued Avondale, insurers, and numerous manufacturers, sellers, and distributors of asbestos-containing products. Trial was scheduled to begin on March 9, 2026.

PROCEDURAL HISTORY

Plaintiffs brought an asbestos-exposure and mesothelioma wrongful-death action against Avondale and numerous other defendants. Before trial, Avondale moved to compel disclosure of all settlements with parties to the action; plaintiffs did not object to identifying settling parties but argued that settlement evidence was inadmissible under Federal Rule of Evidence 408. The court treated the motion as seeking production of information rather than admission of settlement evidence and ordered disclosure of the identities of all settling parties through the conclusion of trial.

DISPOSITION

other

CASES CITED

- Romano v. Metropolitan Life Insurance Co., 2016-0954 (La. App. 4 Cir. 5/24/17), 221 So. 3d 176, 181
- Latiolais v. Cravins, 574 F. App'x 429, 435 (5th Cir. 2014)
- Branch v. Fidelity & Casualty Co. of New York, 783 F.2d 1289, 1294 (5th Cir. 1986)

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