

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
LOUISIANA, LAKE CHARLES DIVISION

Travis Franklin v. Seacor Marine, LLC

Civil Action No. 24-0969 (W.D. La. Mar. 24, 2026) · No. 2:24-cv-00969 · Decided March 24, 2026

SUMMARY

The United States District Court for the Western District of Louisiana considers Seacor Marine, LLC’s motion for summary judgment in Travis Franklin’s maritime injury action. The court holds that the L/B Robert was not a vessel in navigation when Franklin became ill during extensive repairs, so Franklin did not qualify as a Jones Act seaman and could not pursue Jones Act, unseaworthiness, or maintenance-and-cure claims. The ruling also addresses the exclusivity of the Longshore and Harbor Workers’ Compensation Act for claims against an employer.

CASE DETAILS

COURT	United States District Court for the Western District of Louisiana, Lake Charles Division
WRITING FOR THE COURT	Alexander C. Van Hook
JURISDICTION	United States District Court for the Western District of Louisiana, Lake Charles Division
DECIDED	March 24, 2026
DOCKET	2:24-cv-00969
DISPOSITION	other
PROCEDURAL POSTURE	Defendant moved for summary judgment in a maritime personal-injury action. Because neither party demanded a jury, the court applied the bench-trial summary-judgment standard and granted the motion.
STANDARD OF REVIEW	Summary judgment under Federal Rule of Civil Procedure 56(a). In a bench-trial setting, the court may draw inferences from incontrovertibly proven facts and determine that the evidence could not produce a different result at trial, but may not resolve genuine disputes concerning witness credibility or disputed material facts.
PRECEDENTIAL VALUE	unpublished

TOPICS

- jones act
- admiralty
- summary judgment
- unseaworthiness
- maintenance and cure

PRACTICE AREAS

admiralty

maritime personal injury

employment law

civil procedure

summary judgment

QUESTIONS PRESENTED

1. Whether the L/B Robert was a vessel in navigation when Franklin became ill, such that Franklin qualified as a Jones Act seaman.
2. Whether the L/B Robert had reentered navigation during repairs under a capable-of-navigation or intended-purpose test.
3. Whether Franklin could maintain claims for Jones Act negligence, unseaworthiness, and maintenance and cure if he was not a seaman.
4. Whether Franklin could pursue negligence claims against his employer under 33 U.S.C. § 905(b), Louisiana law, or general maritime law despite the LHWCA's exclusivity provision.

HOLDINGS

1. The L/B Robert was not a vessel in navigation when Franklin became ill. Its extensive repairs, year-long out-of-service period, substantial repair cost, transfer of repair control to shore-based contractors, and prolonged layup removed it from navigation.
2. The intended-purpose analysis is the proper test for determining when a vessel that has left navigation during repairs reenters navigation.
3. Because Franklin was not a Jones Act seaman, his Jones Act negligence, unseaworthiness, and maintenance-and-cure claims failed as a matter of law.
4. The LHWCA's exclusivity provision barred Franklin's negligence claims against Seacor under Louisiana law and general maritime law, and Franklin could not proceed under 33 U.S.C. § 905(b) because Seacor was his employer and operator, not the vessel owner.

KEY QUOTATIONS

“The Court finds that Franklin does not qualify as a seaman under the Jones Act because the L/B Robert was no longer a vessel “in navigation.””

“This Court finds the reasoning of Dufrene persuasive and holds the intended purpose analysis is the correct test for determining when a vessel has reentered navigation.”

“Because Franklin does not qualify as a seaman for purposes of the Jones Act, his exclusive remedy is the compensation scheme of the LHWCA.”

FACTUAL BACKGROUND

The L/B Robert, a liftboat operated by Seacor, sustained severe storm damage, including bent legs, extensive hull and structural damage, and damage to a stern thruster and engine. The vessel was towed to shipyards, placed under a Coast Guard no-sail order, and subjected to approximately one year of repairs costing more than \$30 million, or about 55 percent of its value; shore-based contractors performed the repairs while Seacor employees

performed maintenance. Franklin, a Seacor employee who remained aboard as a maintenance worker, experienced stroke-like symptoms on July 30, 2023, while the vessel remained under repair, without an operational stern thruster, and under the no-sail order.

PROCEDURAL HISTORY

Franklin filed claims against his employer, Seacor Marine, alleging Jones Act negligence, unseaworthiness, maintenance and cure, and alternative negligence claims under the LHWCA, Louisiana law, and general maritime law. Seacor moved for summary judgment, arguing that the vessel was not in navigation when Franklin became ill and that Franklin's exclusive remedy was under the LHWCA. The district court granted summary judgment for Seacor on all claims.

DISPOSITION

other

CASES CITED

- Celotex Corp. v. Catrett, 477 U.S. 317, 322 (1986)
- Little v. Liquid Air Corp., 37 F.3d 1069, 1075 (5th Cir. 1994)
- Honore v. Douglas, 833 F.2d 565, 567 (5th Cir. 1987)
- Jones v. United States, 936 F.3d 318, 321 (5th Cir. 2019)
- In re Placid Oil, 932 F.2d 394, 397-98 (5th Cir. 1991)
- Mason Gulf LLC v. Modern American Recycling Service, 878 F.3d 130, 132 (5th Cir. 2017)
- Cain v. Transocean Offshore USA, Inc., 518 F.3d 295, 298, 302 (5th Cir. 2008)
- Becker v. Tidewater, Inc., 335 F.3d 376, 380, 387 (5th Cir. 2003)
- Chandris, Inc. v. Latsis, 515 U.S. 347, 363, 373-74 (1995)
- Wixom v. Boland Marine & Manufacturing Co., 614 F.2d 956-57 (5th Cir. 1980)
- Warwick v. Huthnance Division, Grace Offshore Co., 760 F. Supp. 571, 573-74 (W.D. La. 1991)
- Thomas v. Dual Marine Drilling Co., No. 95-0863, 1996 WL 20846, at *3 (E.D. La. Jan. 17, 1996)
- Newsom v. Jantran, Inc., No. 12-150, 2013 WL 12178166, at *1-2 (N.D. Miss. Dec. 9, 2013)
- Aguilar v. Bollinger Shipyards, Inc., 833 F. Supp. 2d 582, 590 (E.D. La. 2011)
- Dufrene v. Hospitality Enterprises, Inc., 523 F. Supp. 3d 913, 919-26 (E.D. La. 2021)
- Hall v. Diamond M Co., 732 F.2d 1246, 1248 (5th Cir. 1984)
- In re Ingram Barge Co., No. 22-30577, 2023 WL 6123107, at *2 (5th Cir. Sept. 19, 2023)