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## **RECENT DEVELOPMENTS IN ADMIRALTY AND MARITIME LAW AT THE NATIONAL LEVEL AND IN THE FIFTH AND ELEVENTH CIRCUITS**

**Michael F. Sturley**  
Fannie Coplin Regents Chair in Law  
University of Texas at Austin

**Matthew H. Ammerman**  
Law Office of Matthew H. Ammerman, P.C.

Author Contact Information:

Michael F. Sturley  
University of Texas School of Law  
[msturley@law.utexas.edu](mailto:msturley@law.utexas.edu)  
512-232-1350

Matthew H. Ammerman  
Law Office of Matthew H. Ammerman,  
P.C.  
[mha@MaritimeDefense.net](mailto:mha@MaritimeDefense.net)  
713-227-1404

**RECENT DEVELOPMENTS IN ADMIRALTY AND MARITIME LAW AT THE  
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<b><u>I. INTRODUCTION</u></b> .....	1
<b><u>II. LEGISLATION</u></b> .....	3
<b>A. Limitation Act Amendment</b> .....	3
<b>B. Jones Act Amendment</b> .....	5
<b><u>III. THE WORK OF THE SUPREME COURT</u></b> .....	6
<b>A. Overtime Pay Under the Fair Labor Standards Act</b> .....	6
<i>Helix Energy Solutions Group, Inc. v. Hewitt</i>	
<b>B. “Waters of the United States” Under the Clean Water Act</b> .....	8
<i>Sackett v. Environmental Protection Agency</i>	
<b>C. Grants of Certiorari</b> .....	9
<b>1. Marine Insurance</b> .....	9
<i>Great Lakes Insurance SE v. Raiders Retreat Realty Co., LLC</i>	
<b>2. Agency Adjudication</b> .....	9
<i>Securities and Exchange Commission v. Jarkesy</i>	
<b>3. Federal Regulatory Authority</b> .....	10
<i>Loper Bright Enterprises, Inc. v. Raimondo</i>	
<i>Relentless, Inc. v. Department of Commerce</i>	
<b>4. Arbitration</b> .....	11
<i>Bissonnette v. LePage Bakeries Park St., LLC</i>	
<i>Smith v. Spizzirri</i>	
<b>D. Denials of Certiorari</b> .....	13
<i>Newbauer v. Carnival Corp.</i>	
<i>Douglass v. Nippon Yusen Kabushiki Kaisha</i>	
<i>Newbold v. Kinder Morgan SNG Operator L.L.C.</i>	
<i>Barrosse v. Huntington Ingalls, Inc</i>	
<b><u>IV. SELECTED DECISIONS FROM AROUND THE COUNTRY</u></b> .....	14
<b>A. Subject-Matter Jurisdiction in Maritime Cases</b> .....	14
<b>1. Admiralty Jurisdiction in Tort Cases</b> .....	14
<b>a. The location test</b> .....	15
<i>ST Engineering Marine, Ltd. v. Thompson, Maccoll &amp; Bass, LLC, P.A.</i>	
<i>Baltimore Gas &amp; Electric Co. v. Coastline Commercial Contracting, Inc.</i>	

<b>b. The potential-to-disrupt-maritime-commerce test</b> .....	18
<i>In re DeGeorge</i>	
<i>Baltimore Gas &amp; Electric Co. v. Coastline Commercial Contracting, Inc.</i>	
<i>In re Demore’s Montana LLC</i>	
<b>c. The substantial-relationship-to-traditional-maritime activity test</b> .....	20
<i>Baltimore Gas &amp; Electric Co. v. Coastline Commercial Contracting, Inc.</i>	
<b>2. Admiralty Jurisdiction in Contract Cases</b> .....	20
<i>Finney v. Howey</i>	
<b>B. The Rights of Seamen</b> .....	21
<b>1. Maintenance and Cure</b> .....	21
<i>Aadland v. Boat Santa Rita II Inc.</i>	
<b>2. Jones Act Preemption of Title VII Claims</b> .....	23
<i>Christie v. Ingram Barge Co., LLC</i>	
<b>C. Carriage of Goods</b> .....	24
<b>1. Package Limitation</b> .....	24
<i>Hercules OEM Group v. Zim Integrated Shipping Services Ltd.</i>	
<b>2. Restraint of Princes</b> .....	26
<i>Saray Dokum ve Madeni Aksam Sanayi Turizm A.S. v. MTS Logistics, Inc.</i>	
<b>3. Shippers’ Liability to Carriers</b> .....	27
<i>In re M/V MSC Flaminia</i>	
<b>4. The Fair Opportunity Requirement</b> .....	29
<i>Beaumont v. Vanguard Logistics Services (USA), Inc.</i>	
<b>D. Marine Insurance</b> .....	29
<b>1. Choice-of-Law Clauses</b> .....	29
<i>Great Lakes Insurance SE v. Andersson</i>	
<i>Great Lakes Insurance SE v. Raiders Retreat Realty Co., LLC</i>	
<b>2. P&amp;I Policy’s “As Owner” and Automatic-Acquisition Clauses</b> .....	30
<i>Stevanna Towing, Inc. v. Atlantic Speciality Insurance Co.</i>	
<b>3. The Evidentiary Standard for Lost Policy Cases</b> .....	31
<i>Cosmopolitan Shipping Co. v. Continental Insurance Co.</i>	
<b>E. Longshore and Harbor Workers’ Compensation Act (LHWCA)</b> .....	32
<i>Smith v. Crouse Corp</i>	
<i>Owen v. Signal Mutual Indemnity Association, Ltd</i>	
<i>K &amp; R Contractors, LLC v. Keene</i>	

<b>F. Collisions</b> .....	33
<i>Ly v. Lesenskyj</i>	
<b>G. Suits in Admiralty Act and Public Vessels Act</b> .....	35
<i>Hoblick v. United States</i>	
<i>Bingham v. Shaver Transportation Co.</i>	
<b>H. Vessel Owner’s Limitation of Liability</b> .....	37
<i>In re G&amp;J Fisheries, Inc.</i>	
<b>I. Maritime Liens</b> .....	38
<i>Praxis Energy Agents Pte Ltd. v. M/V Pebble Beach</i>	
<b>J. General Maritime Tort Law</b> .....	39
<i>Ranger v. Alamitos Bay Yacht Club</i>	
<b><u>V. THE WORK OF THE COURTS IN THE FIFTH AND ELEVENTH CIRCUITS</u></b> .....	40
<b>A. Jurisdiction in Maritime Cases</b> .....	40
<b>1. Admiralty Jurisdiction in Tort Cases</b> .....	40
<i>Newbold v. Kinder Morgan SNG Operator L.L.C.</i>	
<b>2. Personal Jurisdiction</b> .....	41
<i>Marquette Transportation Co., LLC v. Simon</i>	
<i>Weeks Marine, Inc. v. Carlos</i>	
<i>Seville v. Maersk Line, Ltd.</i>	
<b>B. The Rights of Seamen</b> .....	44
<b>1. Seaman Status</b> .....	44
<b>a. The Substantial-in-Duration Element of Substantial Connection</b> .....	46
<i>Johnson v. Cooper T. Smith Stevedoring Co., Inc.</i>	
<i>Cole v. Oceaneering International, Inc.</i>	
<i>Edwards v. Intermoor Inc.</i>	
<i>Patterson v. Gulf Inland Contractors, Inc.</i>	
<b>b. The Substantial-in-Nature Element of Substantial Connection</b> .....	50
<i>In re Ingram Barge Co., L.L.C. [Ratliff]</i>	
<i>Bouton v. Manson Construction Co.</i>	
<i>Johnson v. Cooper T. Smith</i>	
<i>Burton v. Weeks Marine, Inc.</i>	
<b>2. Maintenance and Cure</b> .....	54
<b>a. Forfeiture for Seaman’s Willful Rejection of Cure</b> .....	54
<i>Theriot v. REC Marine Logistics, LLC</i>	

<b>b. <i>McCorpen</i> defense</b> .....	56
<i>Clark v. Offshore Marine Contractors, Inc.</i>	
<b>c. Punitive Damages for Failure to Pay Maintenance and Cure</b> .....	58
<i>Griffin v. REC Marine Logistics, LLC</i>	
<i>Kenai Ironclad Corp. v. CP Marine Services, LLC</i>	
<i>Gonzales v. Weeks Marine Co., LLC</i>	
<b>d. Entitlement to Maintenance and Cure for Late-Claimed Injuries</b> .....	59
<i>Moran v. Signet Maritime Corp.</i>	
<b>e. Employer’s Declaratory-Judgment Actions on Maintenance and Cure</b> .....	62
<i>Maintenance Dredging I, LLC v. Billiot</i>	
<i>Parker Drilling Offshore USA, LLC v. Painter</i>	
<b>f. Maximum Cure</b> .....	66
<i>Vaughan v. American Commercial Barge Line, LLC</i>	
<b>g. Medicare or Medicaid as a Cure Substitute</b> .....	67
<i>Ambo v. Turn Services, LLC</i>	
<b>h. Contractual Indemnity for Maintenance and Cure</b> .....	69
<i>Enterprise Marine Services, LLC v. Motion Industries, Inc.</i>	
<b>3. Jones Act and Unseaworthiness Litigation</b> .....	70
<b>a. Scope of Employment</b> .....	70
<i>In re Yazoo River Towing, Inc.</i>	
<b>b. Damages</b> .....	71
<i>Vaughan v. American Commercial Barge Line, LLC</i>	
<i>Griffin v. REC Marine Logistics, LLC</i>	
<b>c. Unseaworthiness</b> .....	73
<i>Ayala v. Work Boat Electrical Services, LLC</i>	
<b>d. Proportionate Responsibility</b> .....	73
<i>In re Flamenco</i>	
<b>4. Discovery</b> .....	75
<i>All Coast, LLC v. Shore Offshore Services, LLC</i>	
<b>C. Carriage of Goods</b> .....	76
<i>Jeanty v. Antillean Marine Shipping Corp.</i>	
<i>Ochi Farms, LLC v. King Ocean Services, Ltd.</i>	

<b>D. General Maritime Tort Law</b> .....	78
<b>1. Cruise Ship Cases</b> .....	78
<i>Holland v. Carnival Corp.</i> ,	
<i>Wiegand v. Royal Caribbean Cruises Ltd.</i>	
<b>2. The Causation Element of Negligence</b> .....	81
<i>Willis v. Royal Caribbean Cruises, Ltd.</i>	
<i>Banks v. Alliance Offshore, L.L.C.</i>	
<i>In re Aries Marine Corp.</i>	
<i>In Re Yazoo River Towing, Inc.</i>	
<b>3. Wharfinger’s Liability</b> .....	85
<i>In re Plimsoll Marine, Inc.</i>	
<b>4. Vessel Status</b> .....	86
<i>In re Ingram Barge Company, L.L.C.</i>	
<i>Burton v. Weeks Marine, Inc.</i>	
<b>5. Punitive Damages</b> .....	88
<i>Kenai Ironclad Corp. v. CP Marine Services, LLC</i>	
<b>6. Borrowed Employee Defense to Vicarious Liability</b> .....	89
<i>Garner v. Pontchartrain Partners, L.L.C.</i> ,	
<b>E. Marine Insurance</b> .....	91
<b>1. Forum-Selection Clauses</b> .....	91
<i>Noble House, L.L.C. v. Certain Underwriters at Lloyd’s, London</i>	
<i>Eads v. Spheric Assurance Co., Ltd.</i>	
<b>2. Wilburn Boat and Anti-Technical Provisions Under State Law</b> .....	92
<i>Travelers Property Casualty Co. of America v. Ocean Reef Charters, LLC</i>	
<b>3. Equitable Estoppel</b> .....	93
<i>Diamond Services Corp. v. Travelers Casualty &amp; Surety Co. of America</i>	
<b>F. Longshore and Harbor Workers’ Compensation Act (LHWCA)</b> .....	94
<b>1. Statutory Interpretation</b> .....	94
<i>Huntington Ingalls, Inc. v. Director, OWCP</i>	
<b>2. LHWCA § 5(a)’s Exclusive Remedy Provision in the Twilight Zone</b> .....	97
<i>Barrosse v. Huntington Ingalls, Inc</i>	
<i>Robichaux v. Huntington Ingalls Inc</i>	
<i>Cadiere v. Huntington Ingalls, Inc.</i>	
<i>Hotard v. Avondale Industries, Inc.</i>	

<b>3. Third-Party Settlements</b> .....	102
<i>In re Diamond Services Corp.</i>	
<b>4. Subrogation Rights of LHWCA Carriers</b> .....	103
<i>In re Aries Marine Corp.</i>	
<b>5. Vessel Negligence Actions through LHWCA § 5(b)</b> .....	106
<i>In re Ingram Barge Company, L.L.C.</i>	
<i>Santee v. Oceaneering International, Inc.</i>	
<b>6. Punitive Damages</b> .....	108
<i>Bass v. M/V Star Isfjord</i>	
<b>G. Collisions</b> .....	110
<b>1. Choice of Law</b> .....	110
<i>Marquette Transportation Co. Gulf-Inland, L.L.C. v. Navigation Maritime Bulgare JSC</i>	
<b>2. Contribution or Indemnity</b> .....	111
<i>Turn Services, LLC v. Gulf South Marine Transportation, Inc.</i>	
<b>3. Causation</b> .....	112
<i>In Re Yazoo River Towing, Inc.</i>	
<b>4. The Oregon and Louisiana Rules</b> .....	112
<i>In re Plimsoll Marine, Inc.</i>	
<b>H. Maritime Liens</b> .....	113
<i>Kenai Ironclad Corp. v. CP Marine Services, LLC</i>	
<b>I. Vessel Owner's Limitation of Liability</b> .....	113
<i>Skanska USA Civil Southeast, Inc. v. Bagelheads, Inc.</i>	
<i>In re Intrepid Marine Towing &amp; Salvage, Inc.</i>	
<i>In re Ferreira Construction Co.</i>	
<i>In re Third Coast Marine Service, Inc.</i>	
<b>J. Arbitration</b> .....	118
<b>1. Grounds for Vacating an Award</b> .....	118
<i>Corporación AIC, SA v. Hidroeléctrica Santa Rita S.A.</i>	
<b>2. Arbitration of Filipino Seamen's Claims</b> .....	120
<i>Llagas v. Sealift Holdings, Inc.</i>	
<b>K. Procedure</b> .....	121
<b>1. Appellate Procedure</b> .....	121
<i>Royal Caribbean Cruises Ltd. v. Ooi</i>	
<i>Keyes v. BP Exploration &amp; Production, Inc.</i>	

<b>2. Removal</b> .....	122
<b>a. Federal-Officer Removal</b> .....	122
<i>Port of Corpus Christi Authority v. Port of Corpus Christi L.P.</i>	
<b>b. Removal into Admiralty</b> .....	123
<i>Port of Corpus Christi Authority v. Port of Corpus Christi L.P.</i>	
<i>In re N&amp;W Marine Towing, L.L.C.</i>	
<b>c. Removal of the Climate-Change Cases</b> .....	126
<i>Plaquemines Parish v. Chevron USA, Inc.</i>	
<b>L. Oil Pollution Act of 1990</b> .....	127
<i>Munoz v. Intercontinental Terminals Co., L.L.C.</i>	
<b>M. Outer Continental Shelf Lands Act (OCSLA)</b> .....	128
<i>Ramirez v. Paloma Energy Consultants, L.P.</i>	
<b>N. The BP Gulf Oil Spill Litigation</b> .....	130
<i>Byrd v. BP Exploration &amp; Production, Inc.</i>	
<i>Prest v. BP Exploration &amp; Production, Inc.</i>	



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Michael F. Sturley  
Fannie Coplin Regents Chair in Law  
University of Texas  
727 East Dean Keeton Street, Austin, Texas 78705  
512/232-1350; Fax 512/471-6988  
[msturley@law.utexas.edu](mailto:msturley@law.utexas.edu)

Matthew H. Ammerman  
LAW OFFICE OF MATTHEW H. AMMERMAN, P.C.  
2040 North Loop West, Ste. 390, Houston, Texas 77018-8114  
713/227-1404; Fax 713/456-2634  
[mha@MaritimeDefense.net](mailto:mha@MaritimeDefense.net)

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**I. INTRODUCTION**

This is the twenty-third paper in a series of annual reports on U.S. admiralty and maritime law and practice.<sup>1</sup> In these papers, we try to call attention to significant national-

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<sup>1</sup> The preceding twenty-two papers are Michael F. Sturley & Matthew H. Ammerman, *Recent Developments in Admiralty and Maritime Law at the National Level and in the Fifth and Eleventh Circuits*, 47 TUL. MAR. L.J. 453 (2023) [hereinafter *2022 Recent Developments*]; Michael F. Sturley & Matthew H. Ammerman, *Recent Developments in Admiralty and Maritime Law at the National Level and in the Fifth and Eleventh Circuits*, 46 TUL. MAR. L.J. 531 (2022) [hereinafter *2021 Recent Developments*]; Michael F. Sturley & Matthew H. Ammerman, *Recent Developments in Admiralty and Maritime Law at the National Level and in the Fifth and Eleventh Circuits*, 45 TUL. MAR. L.J. 549 (2021) [hereinafter *2020 Recent Developments*]; Michael F. Sturley & Matthew H. Ammerman, *Recent Developments in Admiralty and Maritime Law at the National Level and in the Fifth and Eleventh Circuits*, 44 TUL. MAR. L.J. 513 (2020) [hereinafter *2019 Recent Developments*]; David W. Robertson, Michael F. Sturley & Matthew H. Ammerman, *Recent Developments in Admiralty and Maritime Law at the National Level and in the Fifth and Eleventh Circuits*, 43 TUL. MAR. L.J. 367 (2019) [hereinafter *2018 Recent Developments*]; David W. Robertson, Michael F. Sturley & Matthew H. Ammerman, *Recent Developments in Admiralty and Maritime Law at the National Level and in the Fifth and Eleventh Circuits*, 42 TUL. MAR. L.J. 373 (2018) [hereinafter *2017 Recent Developments*]; David W. Robertson & Michael F. Sturley, *Recent Developments in Admiralty and Maritime Law at the National Level and in the Fifth and Eleventh Circuits*, 41 TUL. MAR. L.J. 437 (2017) [hereinafter *2016 Recent Developments*]; David W. Robertson & Michael F. Sturley, *Recent Developments in Admiralty and Maritime Law at*

level developments that bear on the work of admiralty judges, lawyers, and scholars, and we look more closely at the relevant work of the U.S. Courts of Appeals for the Fifth and

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*the National Level and in the Fifth and Eleventh Circuits*, 40 TUL. MAR. L.J. 343 (2016) [hereinafter *2015 Recent Developments*]; David W. Robertson & Michael F. Sturley, *Recent Developments in Admiralty and Maritime Law at the National Level and in the Fifth and Eleventh Circuits*, 39 TUL. MAR. L.J. 471 (2015) [hereinafter *2014 Recent Developments*]; David W. Robertson & Michael F. Sturley, *Recent Developments in Admiralty and Maritime Law at the National Level and in the Fifth and Eleventh Circuits*, 38 TUL. MAR. L.J. 419 (2014) [hereinafter *2013 Recent Developments*]; David W. Robertson & Michael F. Sturley, *Recent Developments in Admiralty and Maritime Law at the National Level and in the Fifth and Eleventh Circuits*, 37 TUL. MAR. L.J. 401 (2013) [hereinafter *2012 Recent Developments*]; David W. Robertson & Michael F. Sturley, *Recent Developments in Admiralty and Maritime Law at the National Level and in the Fifth and Eleventh Circuits*, 36 TUL. MAR. L.J. 425 (2012) [hereinafter *2011 Recent Developments*]; David W. Robertson & Michael F. Sturley, *Developments in Admiralty and Maritime Law at the National Level and in the Fifth and Eleventh Circuits*, 35 TUL. MAR. L.J. 493 (2011) [hereinafter *2010 Recent Developments*]; David W. Robertson & Michael F. Sturley, *Recent Developments in Admiralty and Maritime Law at the National Level and in the Fifth and Eleventh Circuits*, 34 TUL. MAR. L.J. 443 (2010) [hereinafter *2009 Recent Developments*]; David W. Robertson & Michael F. Sturley, *Recent Developments in Admiralty and Maritime Law at the National Level and in the Fifth and Eleventh Circuits*, 33 TUL. MAR. L.J. 381 (2009) [hereinafter *2008 Recent Developments*]; David W. Robertson & Michael F. Sturley, *Recent Developments in Admiralty and Maritime Law at the National Level and in the Fifth and Eleventh Circuits*, 32 TUL. MAR. L.J. 493 (2008) [hereinafter *2007 Recent Developments*]; David W. Robertson & Michael F. Sturley, *Recent Developments in Admiralty and Maritime Law at the National Level and in the Fifth and Eleventh Circuits*, 31 TUL. MAR. L.J. 463 (2007) [hereinafter *2006 Recent Developments*]; David W. Robertson & Michael F. Sturley, *Recent Developments in Admiralty and Maritime Law at the National Level and in the Fifth and Eleventh Circuits*, 30 TUL. MAR. L.J. 195 (2006) [hereinafter *2005 Recent Developments*]; David W. Robertson & Michael F. Sturley, *Recent Developments in Admiralty and Maritime Law at the National Level and in the Fifth and Eleventh Circuits*, 29 TUL. MAR. L.J. 369 (2005) [hereinafter *2004 Recent Developments*]; David W. Robertson & Michael F. Sturley, *Recent Developments in Admiralty and Maritime Law at the National Level and in the Fifth and Eleventh Circuits*, 16 U.S.F. MAR. L.J. 147 (2004) [hereinafter *2003 Recent Developments*]; David W. Robertson & Michael F. Sturley, *Recent Developments in Admiralty and Maritime Law at the National Level and in the Fifth and Eleventh Circuits*, 27 TUL. MAR. L.J. 495 (2003) [hereinafter *2002 Recent Developments*]; David W. Robertson & Michael F. Sturley, *Recent Developments in Admiralty and Maritime Law at the National Level and in the Fifth and Eleventh Circuits*, 26 TUL. MAR. L.J. 193 (2001) [hereinafter *2001 Recent Developments*].

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