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

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**RECENT DEVELOPMENTS IN ADMIRALTY AND MARITIME LAW AT THE  
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<b>I. INTRODUCTION</b> .....	1
<b>II. THE WORK OF THE SUPREME COURT</b> .....	3
A. Asbestos .....	3
<i>Air and Liquid Systems Corp. v. DeVries</i>	
B. Punitive Damages .....	4
<i>Dutra Group v. Batterton</i>	
C. The Outer Continental Shelf Lands Act (OCSLA) .....	10
<i>Parker Drilling Management Services, Ltd. v. Newton</i>	
D. Sovereign Immunity .....	14
<i>Thacker v. Tennessee Valley Authority</i>	
E. Pending Charterparty Case .....	15
<i>Citgo Asphalt Refining Co. v. Frescati Shipping Co.</i>	
F. Denials of Certiorari .....	15
<i>Liberty Mutual Insurance Co. v. Carrizo Oil &amp; Gas, Inc.</i>	
<i>Davis v. Valsamis, Inc.</i>	
<b>III. SELECTED DECISIONS FROM AROUND THE COUNTRY</b> .....	16
A. Subject-Matter Jurisdiction in Maritime Cases .....	16
1. Admiralty Jurisdiction in Contract Cases .....	16
<i>Dimond Rigging Co., LLC v. BDP International, Inc.</i>	
<i>National Union Fire Insurance Company of Pittsburgh, PA. v.</i> <i>Garpo Marine Services, Inc.</i>	
2. Admiralty Jurisdiction in Tort Cases .....	17
<i>Adamson v. Port of Bellingham</i>	
<i>Walker v. Blackmer Pump Co.</i>	
B. The Rights of Seamen .....	19
<i>Castro v. Tri Marine Fish Company, LLC</i>	
C. Carriage of Goods .....	22
1. The COGSA § 4(5) Package Definition and Customary Freight Units .....	22
<i>Bristow US LLC v. Wallenius Wilhelmsen Logistics, AS</i>	
2. Identifying the Governing Law .....	23
<i>Caddell Construction Co. (DE), LLC v. Danmar Lines, Ltd.</i>	

3. Time-for-Suit Provisions .....	23
<i>Dimond Rigging Co., LLC v. BDP International, Inc.</i>	
<i>Vesuvius USA Corp. v. American Commercial Lines LLC</i>	
D. Marine Insurance .....	24
<i>Starr Indemnity &amp; Liability Co. v. Water Quality Insurance Syndicate</i>	
E. Longshore and Harbor Workers' Compensation Act (LHWCA) .....	25
<i>Muhammad v. Norfolk Southern Railway Co.</i>	
<i>Grimm v. Vortex Marine Construction</i>	
<i>Cruz v. National Steel &amp; Shipbuilding Co.</i>	
<i>Pena-Garcia v. Director, OWCP</i>	
F. Maritime Liens .....	32
1. Bunker-Fuel Cases .....	32
<i>Clearlake Shipping Pte Ltd. v. NuStar Energy Services, Inc.</i>	
<i>Nippon Kaisha Line Ltd. v. Nustar Energy Services, Inc.</i>	
<i>U.S. Oil Trading LLC v. M/V Vienna Express</i>	
<i>Praxis Energy Agents Pte Ltd v. M/V Pebble Beach</i>	
2. General Maritime Law Tort Liens .....	35
<i>Barnes v. Sea Hawaii Rafting, LLC (2018)</i>	
<i>Barnes v. Sea Hawaii Rafting, LLC (2019)</i>	
G. Collision .....	36
<i>Dakota, Minnesota &amp; Eastern Railroad Corp. v. Ingram Barge Co.</i>	
H. Vessel Owner's Limitation of Liability .....	38
<i>In re Williams Sports Rentals Inc. [Williams II]</i>	
I. The Oil Pollution Act of 1990 .....	40
<i>Power Authority of New York v. Tug M/V Ellen S. Bouchard</i>	
<u>IV. THE WORK OF THE COURTS IN THE FIFTH AND ELEVENTH CIRCUITS</u> .....	42
A. Subject-Matter Jurisdiction in Maritime Cases .....	42
1. Diversity Jurisdiction .....	42
<i>Caron v. NCL (Bahamas), Ltd.</i>	
2. Admiralty Jurisdiction in Tort Cases .....	43
<i>Caron v. NCL (Bahamas), Ltd.</i>	
B. Personal Jurisdiction .....	43
<i>Carmona v. Leo Ship Management</i>	

C. The Rights of Seamen .....	45
1. Seaman Status .....	45
a. Vessel Status .....	45
<i>Superior Energy Services v. Partin</i>	
b. The 30% Guideline .....	46
<i>Lee v. Nacher Corp.</i>	
<i>Barrios v. Centaur, LLC</i>	
c. The Change-of-Assignment Rule .....	49
<i>Ross v. W&amp;T Offshore, Inc.</i>	
d. The “Nature” Requirement .....	49
<i>Sanchez v. Enterprise Offshore Drilling LLC</i>	
2. Maintenance and Cure .....	51
<i>Randle v. Crosby Tugs, L.L.C.</i>	
<i>In re 4-K Marine, L.L.C. v. Enterprise Marine Services, L.L.C.</i>	
3. Jones Act and Unseaworthiness Litigation .....	54
<i>Gowdy v. Marine Spill Response Corp.</i>	
<i>Jones v. United States</i>	
<i>Dean v. Sea Supply, Inc.</i>	
<i>Nazareth v. McDermott International, Inc.</i>	
D. General Maritime Contract Law .....	60
<i>Eni US Operating Co., Inc. v. Transocean Offshore Deepwater Drilling, Inc.</i>	
E. General Maritime Tort Law .....	61
<i>K.T. v. Royal Caribbean Cruises, Ltd.</i>	
<i>Sutton v. Royal Caribbean Cruises, Ltd.</i>	
F. Carriage of Goods .....	64
1. The COGSA § 4(5) Package Definition .....	64
<i>Global Oil Tools, Inc. v. Expeditors International of Washington, Inc.</i>	
2. The Fair Opportunity Requirement .....	65
<i>Global Oil Tools, Inc. v. Expeditors International of Washington, Inc.</i>	
3. <i>Forum Non Conveniens</i> and Forum Selection Clauses in Bills of Lading .....	65
<i>Global Oil Tools, Inc. v. Expeditors International of Washington, Inc.</i>	

4. Carriers' Actions Against Cargo Interests .....	68
<i>A.P. Moller - Maersk A/S v. Safewater Lines (I) Pvt., Ltd.</i>	
G. Marine Insurance .....	68
1. Additional Insurance and Waiver of Subrogation .....	68
<i>Lloyd's Syndicate 457 v. FloaTEC, L.L.C. (5th Cir.)</i>	
<i>Lloyd's Syndicate 457 v. FloaTEC, L.L.C. (S.D. Tex.)</i>	
2. <i>Wilburn Boat</i> .....	70
<i>Travelers Property Casualty Co. of America v.</i>	
<i>Ocean Reef Charters, LLC</i>	
3. Coverage of Attorney's Fees and Other Defense Costs .....	71
<i>Anadarko Petroleum Corp. v. Houston Casualty Co.</i>	
H. Longshore and Harbor Workers' Compensation Act (LHWCA) .....	72
1. Statutory Coverage of the LHWCA .....	72
<i>Wood Group Production Services v. Director, OWCP [Malta]</i>	
<i>Williams v. Director, OWCP</i>	
2. The Outer Continental Shelf Lands Act (OCSLA) Extension of LHWCA .....	77
<i>Mays v. Chevron Pipe Line Co.</i>	
<i>Gantt v. Seadrill Americas, Inc.</i>	
3. Negligence Actions Under LHWCA § 5(b) .....	81
<i>Manson Gulf, L.L.C. v. LaFleur</i>	
I. Maritime Liens .....	82
<i>NuStar Energy Services, Inc. v. M/V COSCO Auckland</i>	
J. Salvage .....	83
<i>Jupiter Wreck, Inc. v. Unidentified Wrecked &amp; Abandoned</i>	
<i>Sailing Vessel</i>	
K. Vessel Owner's Limitation of Liability .....	84
<i>Shell Offshore, Inc. v. Tesla Offshore, LLC</i>	
<i>Orion Marine Construction, Inc. v. Carroll</i>	
<i>In re: Brown</i>	
L. Appellate Procedure .....	89
1. Appellate Standing .....	89
<i>NuStar Energy Services, Inc. v. M/V COSCO Auckland</i>	

2. The Rule of Orderliness .....	90
<i>Eni US Operating Co., Inc. v. Transocean Offshore Deepwater Drilling, Inc.</i>	
M. Removal .....	90
<i>Sanchez v. Enterprise Offshore Drilling LLC</i>	
N. The Oil Pollution Act of 1990 .....	92
<i>United States v. Nature's Way Marine, L.L.C.</i>	
O. The BP Gulf Oil Spill Litigation .....	93
<i>Lake Eugenie Land &amp; Development, Inc. v. Halliburton Energy Services, Inc. (In re Deepwater Horizon)</i>	
<i>Claimant ID 100081155 v. BP Exploration &amp; Production</i>	
<i>BP Exploration &amp; Production v. Claimant ID 100094497</i>	
<i>Halliburton Co. v. Chubb Bermuda Insurance Ltd.</i>	

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**I. INTRODUCTION**

This is the nineteenth 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 the principal national-

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<sup>1</sup> The preceding eighteen papers are 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 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*,

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 Eleventh Circuits. We do not warrant full coverage, although with respect to the Fifth and Eleventh Circuit Courts of Appeals, we try to be fairly thorough.<sup>2</sup>

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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*].

<sup>2</sup> We make no attempt to be thorough respecting district court decisions, although we have included some for their information value. “A decision by a federal district judge is not binding precedent in either a different judicial district, the same judicial district, or even upon the same judge in a different case.” 18 MOORE’S FEDERAL PRACTICE § 134.02[1][d], p. 138-24.1 (3d ed. 2007). See also *American Electric Power Co. v. Connecticut*, 564 U.S. 410, 428 (2011) (“[F]ederal district judges, sitting as sole adjudicators, lack authority to render precedential decisions binding other judges, even members of the same court.”).



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