

MDL2179

JUDICIAL PANEL ON
MULTIDISTRICT LITIGATION

MAY - 6 2010

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**BEFORE THE JUDICIAL PANEL ON
MULTIDISTRICT LITIGATION**

MDL DOCKET NO.-

In Re: Gulf of Mexico Oil Contamination :

**MOTION OF PLAINTIFFS FOR TRANSFER OF ACTIONS TO THE EASTERN
DISTRICT OF LOUISIANA PURSUANT TO US 28 U.S.C. §1407 FOR COORDINATED
OR CONSOLIDATED PRETRIAL PROCEEDINGS**

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Pursuant to 28 U.S.C. §1407 and Rule 7.2 of the Rules of Procedure of the Judicial Panel on MultiDistrict Litigation, plaintiffs in the action captioned *Acy J. Cooper and Ronnie Louis Anderson, individually and on behalf of themselves and all other similarly situated, Plaintiffs, v. BP, plc, BP Products North America, Inc., BP America, Transocean, Ltd., Transocean Offshore Deepwater Drilling, Inc., Transocean Deepwater, Inc., Inc. Halliburton Energy Services, Inc., and Cameron International Corporation f/k/a Cooper-Cameron Corporation, any and all additional related actions that may be brought to the attention of the Panel against similar defendants, to the United States District Court for the Eastern District of Louisiana before the Honorable Judge Ivan L.R. Lemelle.*

As set forth below and in the accompanying Memorandum, Movants believe the actions listed on the accompanying Schedule of Actions (attached as Exhibit "A" to Plaintiffs' Memorandum of Law in Support of Motion for Transfer and Coordination or Consolidation

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IMAGED MAY - 6 2010

under 28 U.S.C. §1407) satisfy the requirements for consolidation and coordination because they concern common questions of fact and law and consolidation or coordination will serve the interest of efficiency and convenience.

In support of this Motion, Movants state as follows:

Movants are the named plaintiffs in the following action:

Acy J. Cooper and Ronnie Louis Anderson, individually and on behalf of themselves and all other similarly situated Plaintiffs, v. BP, plc, BP Products North America, Inc., BP America, Inc., Transocean, Ltd., Transocean Offshore Deepwater Drilling, Inc., Transocean Deepwater, Inc., Halliburton Energy Services, Inc., and Cameron International Corporation f/k/a Cooper-Cameron Corporation,

Movants bring this action against defendants based on the defendants' design, maintenance, and use of products and devices that allowed the contamination of the Gulf of Mexico, its adjoining coastal and marine environments, and subsequent damages to the marine industry.

Counsel for Movants are aware of the following other federal action containing virtually identical allegations and seeking similar relief against similar defendants. See Schedule of Actions.

For the foregoing reasons, Movants respectfully move this Panel for an order transferring all pending actions against defendants and any other additional related actions that may be brought to the attention of the Panel, to the United States District Court for the Eastern District of Louisiana before the Honorable Ivan L.R. Lemelle or, alternatively, Chief Judge Sarah S. Vance or Honorable Mary Ann Vial Lemmon.

Date: April 30, 2010

Respectfully submitted,

s/ Daniel E. Becnel, Jr.

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