

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF LOUISIANA**

**WILLIAM D. GREGOIRE, VERONICA
G. STELLY AND TOBY J. STELLY**

CIVIL ACTION NUMBER 2:10-CV-01351

VERSUS

JUDGE KURT D. ENGELHARDT

TRANSOCEAN, LTD., ET AL.

MAGISTRATE JUDGE ALMA CHASEZ

**PLAINTIFFS' MOTION TO CONSOLIDATE AND TRANSFER CASE
PURSUANT TO LOCAL RULES 3.1 & 3.1.E**

NOW INTO COURT, through undersigned counsel, come Plaintiffs, William D. Gregoire, *et al.*, who, for the reasons set forth in the attached memorandum in support, respectfully request that this proceeding be consolidated with a previously filed civil action herein, *Troy Wetzel, et al. vs. Transocean Ltd., et al.*, 2:10-cv-01222; Sec. J(5)(E.D. La.), pursuant to Local Rules 3.1 & 3.1.E. Counsel of record herein for the Defendants who have made an appearance, BP Exploration & Production, Inc., BP Products North America, Inc., Transocean Deepwater, Inc., and Transocean Offshore Deepwater Drilling, Inc., were asked by undersigned counsel via email on the morning of June 7, 2010, to state whether Defendants consent or oppose this requested consolidation; to date, opposing counsel has not responded to Plaintiffs' email request in any way.

Respectfully submitted:

s/Michael C. Palmintier

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CERTIFICATE

I HEREBY CERTIFY that on this 8th day of June, 2010, the foregoing document was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record by operation of the court's electronic filing system.

s/J.E.Cullens, Jr.
J.E.Cullens, Jr.