

FILED  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA  
2010 JUN -9 PM 4:40  
LORETTA G. WHYTE  
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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

**HORNBECK OFFSHORE SERVICES,  
L.L.C.,**

**Plaintiff**

\* **CIVIL ACTION NO. 10-1663(F)(2)**

**VERSUS**

\* **SECTION F**

**KENNETH LEE "KEN" SALAZAR, IN HIS  
OFFICIAL CAPACITY AS SECRETARY,  
UNITED STATES DEPARTMENT OF THE  
INTERIOR; UNITED STATES**

**DEPARTMENT OF THE INTERIOR;  
ROBERT "BOB" ABBEY, IN HIS OFFICIAL  
CAPACITY AS ACTING DIRECTOR,  
MINERALS MANAGEMENT SERVICE;  
AND MINERALS MANAGEMENT SERVICE,**

\* **JUDGE FELDMAN**

\* **MAGISTRATE 2  
MAGISTRATE WILKINSON**

**Defendants**

\* \* \* \* \*

**BOLLINGER AND CHOUEST ENTITIES' MOTION FOR PRELIMINARY  
INJUNCTION AND TO ADOPT GROUNDS FOR PRELIMINARY INJUNCTION AS  
SET FORTH IN HORNBECK'S MOTION FOR PRELIMINARY INJUNCTION**


NOW COME Plaintiffs, Bollinger Shipyards, Inc., Bollinger Shipyards Lockport, L.L.C.,  
Bollinger Algiers, L.L.C., Bollinger Amelia Repair, L.L.C., Bollinger Calcasieu, L.L.C.,  
Bollinger Fourchon, L.L.C., Bollinger Larose, L.L.C., Bollinger Marine Fabricators, L.L.C.,  
Bollinger Morgan City, L.L.C., Bollinger Quick Repair, L.L.C., Bollinger Texas City, L.P.,  
Bollinger Gretna, L.L.C., Bee Mar LLC, Bee Mar Crews LLC, Bee Mar – Honey Bee LLC, Bee  
Mar – Worker Bee LLC, Bee Mar – Bayou Bee LLC, Bee Mar – Bumble Bee LLC, Bee Mar –

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Busy Bee LLC, Bee Mar – Bee Sting LLC, Bee Mar – Queen Bee LLC, and Bee Mar – Bee Hive LLC, (collectively, the “Bollinger Entities”); and Martin Holdings, L.L.C, C-Port, L.L.C., C-Port 2, L.L.C., Offshore Support Services, L.L.C., Fourchon Heavy Lift, L.L.C., Clean Tank, L.L.C., Sea Fluids, L.L.C., C-Innovation, L.L.C., Alpha Marine Services, L.L.C., Nautical Solutions, L.L.C., Nautical Ventures, L.L.C., Reel Pipe, L.L.C., North American Fabricators, L.L.C., North American Shipbuilding, L.L.C., Gulf Ship, L.L.C. and Tampa Ship, L.L.C. (collectively, the “Chouest Entities”) who hereby move for a preliminary injunction and further move to adopt the arguments supporting a preliminary injunction as set forth in the Motion for Preliminary Injunction and Memorandum in Support of Motion for Preliminary Injunction filed by Hornbeck Offshore Services, L.L.C., on June 9, 2010. The accompanying memorandum further supports entry of a preliminary injunction.

WHEREFORE, the Bollinger and Chouest Entities respectfully request that this Court enter a preliminary injunction enjoining the Moratorium and NTL as applied to all drilling in water at depths of greater than 500 feet.

Respectfully submitted,



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AND

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**Attorneys for Plaintiffs,  
Bollinger and Chouest Entities.**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing pleading has been served upon all parties by hand, email, or overnight mail this 9th day of June 2010.

  
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