

NINETEENTH JUDICIAL DISTRICT COURT  
EAST BATON ROUGE PARISH  
STATE OF LOUISIANA

NUMBER: \_\_\_\_\_

DIVISION: \_\_\_\_\_

LOUISIANA DEPARTMENT OF  
TRANSPORTATION & DEVELOPMENT

VS

CHRIS JORDAN AND FLORIDA  
MARINE TRANSPORTERS, LLC

FILED: \_\_\_\_\_

\_\_\_\_\_DY CLERK

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PETITION

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The Department of Transportation and Development a body politic, domiciled in East Baton Rouge Parish, Louisiana respectfully represents:

1.

Made defendants herein are:

- A. **Chris Jordan**, (“Jordan”) a natural person of the full age of majority, who was the Captain of the M/V Kristy Dutch at the time of the incident complained of herein; and,
- B. **Florida Marine Transporters, LLC** , (“Florida Marine”) a Delaware limited liability company that owned the Kristy Dutch, and employed Chris Jordan at the time of the incident complained of herein that can be served through its registered agent Tim Burns at 2360 5<sup>th</sup> St., Mandeville, LA 70471

2.

Plaintiff owns and is responsible for the administration, maintenance and repair of the Grand Lake Pontoon Bridge, (“bridge”), which provides highway access to Big Lake Island via Louisiana Highway 384 in Cameron Parish, Louisiana.

3.

On May 14, 2023, the bridge was operated in compliance with all applicable state and federal regulations and while, open and stationary, the Kristy Dutch allided with the bridge, at approximately 3:00 AM while towing barges in the Intercoastal Waterway.

**4.**

Jordan was in control of, and navigating the Kristy Dutch, at the time of the allision, which resulted in substantial damage the bridge its whalers, fender system, closing cable, pivot arm, and pontoon.

**5.**

The accident and damages were solely caused by the fault and neglect of Jordan, and Florida Marine, in the following particulars, among others, which will be shown at the trial of this matter:

- a) The unseaworthiness of the vessel;
- b) the inattentiveness of Jordan, and the crew of the Kristy Dutch;
- c) operation of the Kristy Dutch at an unsafe speed for the prevailing circumstances and conditions;
- d) the failure to use all available means to avoid the allision;
- e) the failure to take positive actions as required by the Inland Rules of the Road;
- f) the failure to alter The vessel's course to avoid the allision; the
- g) the failure to steer the vessel as necessary to avoid the allision;
- h) the failure to maintain control of the vessel;
- i) failure to take corrective actions when they knew or should have known the allision was eminent;
- j) the failure to maintain a proper lookout; and
- k) navigation in a negligent manner.

**7.**

Jordan's actions and inactions occurred "in the course" and "arose out of" of his employment with Florida Marine.

**8.**

Venue is proper under Louisiana Revised Statute 13:3203 and Louisiana Code of Civil Procedure Article 73.

**9.**

Plaintiff is entitled to file and prosecute this action without the payment of court costs in advance, or as they accrue under La. RS. 13:4521.

WHEREFORE, The State of Louisiana Through Its Department of Transportation and Development prays that the defendants be served and cited with process as required by law and after due proceedings are had, for entry of a judgment in its favor and against Chris Jordan and Florida Marine Transportation, LLC for all damages together with interest cost and attorneys fees as allowed by law.

Plaintiff prays for all other relief that is appropriate under the circumstances considered.

Respectfully Submitted,

**LOUISIANA DEPARTMENT OF  
TRANSPORTATION AND DEVELOPMENT**



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**PLEASE SERVE**

**Florida Marine Transporters, LLC  
Through Tim Burns  
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Mandeville, LA 70471**