

Highlights of the 2024-2025 Edition

The Law of Seaman, 5th, is now in a two-volume softbound format to enhance ease of use. This format replaces the binders and loose-leaf pages and will be updated annually with replacement volumes.

- In a case not cited in this treatise, but important to Maritime practitioners, the Supreme Court has held that a choice of law provision in a marine insurance contract is presumptively valid. *Great Lakes Insurance SE v. Raiders Retreat Realty Co., LLC*, 601 U.S. 65, 144 S. Ct. 637 (2024).
- Employment contracts that selected Liberian Law controlled plaintiff's contract claims. *Ganpat v. Eastern Pacific Shipping PTE, Limited*, 100 F.4th 584 (5th Cir. 2024).
- The doctrine of equitable estoppel may not be invoked by parties who are not parties to the employment agreement where plaintiffs did not sue under the employment agreements. *USME v. CMI Leisure Management, Inc.*, 106 F.4th 1079 (11th Cir. 2024). Cf. *Chemaly v. Lampert*, 2024 WL 663654 (S.D. Fla. 2024).
- An arbitration agreement not subject to the Federal Arbitration Act may be enforced under state law. *Rodgers-Rouzier v. American Queen Steamboat Operating Company, LLC*, 104 F.4th 978 (7th Cir. 2024).
- In decisions previously cited in this treatise, the court had denied defendants contention that *Meaux* did not satisfy the *Sanchez* criteria for seaman status. After trial, however, the court held that *Meaux* did not satisfy the *Sanchez* criteria. *Meaux v. Cooper Consolidated, LLC*, 601 F. Supp. 3d 38 (E.D. La. 2022).
- ROV operator aboard a vessel does not satisfy the *Sanchez* criteria. *Santee v. Oceaneering International, Incorporated*, 95 F.4th 917 (5th Cir. 2024). Also see, *Rak v. C-Innovation, L.L.C.*, 2024 WL 2252723 (E.D. La. 2024).
- An unexplained explosion of ship's equipment renders the vessel unseaworthy. *Ayala v. Work Boat Electrical Services, LLC*, 2023 WL 8622145 (E.D. La. 2023), citing *Johnson v. Donjon Marine Co.*, 2006 WL 3240730 (E.D. N.Y. 2006).
- The Court of Appeals for the Sixth Circuit has held that the Pennsylvania Rule does not apply in Jones Act cases. *Adkins v. Marathon Petroleum Company, LP*, 105 F.4th 841 (6th Cir. 2024).