



David P. Bruchhaus
Chad E. Mudd
M. Keith Prudhomme
Matthew P. Keating
Wesley A. Romero
Jamie C. Gary

422 E. College St., Suite B | Lake Charles | LA 70605
Phone: (337) 562-2327
Fax: (337) 562-2391
Web: www.lakecharleslawfirm.com

July 15, 2022

VIA HAND DELIVERY

Jeff Davis Parish Clerk of Court
31st Judicial District Court
P.O. Box 799
Jennings, LA 70546

Re: *Castex Development, LLC v. Anadarko Petroleum Corp., et al*
31st JDC, Jefferson Davis Parish, Louisiana

Dear Mr. Arceneaux:

In connection with the above captioned matter, please find an original and three (3) copies of an Unopposed Motion for Leave to File First Supplemental and Amending Petition, Order and First Supplemental and Amending Petition For Damages. Please present the original to Judge Gunnell for signing, file same into the record of these proceedings and return a conformed copy of same to me. Please certify the remaining copies and serve same upon defendants as directed in the Petition.

Also enclosed is a copy of Plaintiff's Original Petition For Damages. Please certify same and serve along with the First Supplemental and Amending Petition For Damages as directed in the Petition.

Please find enclosed our firm check in the amount of \$300.00 representing payment of filing and \$40.44 for service fees.

Thanking you and with kind regards, I remain

Sincerely,

MATTHEW P. KEATING

MPK/dsb
Enclosures

cc: John H. Carmouche/Christopher Martin (*via email*)
William Lampton/Justin Marocco/W. Thomas McCall/Tiffany Dupree/
Christoffer C. Friend/Meghan E. Smith (*via email*)
George Arceneaux/Court VanTassell/Brittain Bush/Emily Borgen/John Troutman/
Ranee Iles/Denice Redd-Robinette (*via email*)
Eric Jarrell/Robert Burvant/Michael Cerniglia/Patrick Isacks/Brent Burns (*via email*)
Charles "Trey" McCowan, III (*via email*)
James Lapeze/Cristian Solar/Jamie Rhymes (*via email*)

31st JUDICIAL DISTRICT COURT FOR THE PARISH OF JEFFERSON DAVIS

STATE OF LOUISIANA

DOCKET NO. 502-20

DIVISION: C

CASTEX DEVELOPMENT, LLC

VERSUS

ANADARKO PETROLEUM CORPORATION, ET AL.

FILED: _____

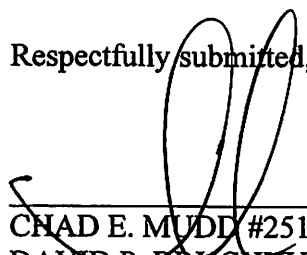
DEPUTY CLERK

**UNOPPOSED MOTION FOR LEAVE TO FILE
FIRST SUPPLEMENTAL AND AMENDING PETITION**

NOW INTO COURT, through undersigned counsel, comes Plaintiff, Castex Development, LLC, and respectfully requests leave of this Honorable Court to file the attached First Supplemental and Amending Petition for Damages. Undersigned counsel for plaintiff has conferred with counsel for defendants, and defendants are unopposed to plaintiff's filing of this motion and the Court's granting of same.

WHEREFORE, Plaintiff, Castex Development, LLC prays that leave be granted to file the First Supplemental and Amending Petition for Damages and that the First Supplemental and Amending for Damages be filed.

Respectfully submitted,



CHAD E. MUDD #25188
DAVID P. BRUCHHAUS #24326
MATTHEW P. KEATING #30911
WESLEY A. ROMERO #33344
MUDD BRUCHHAUS & KEATING, L.L.C.
422 E. College Street, Suite B
Lake Charles, LA 70605
Telephone: (337) 562-2327
Facsimile: (337) 562-2391

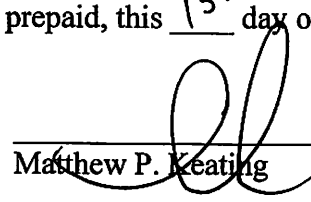
and

JOHN H. CARMOUCHE #22294
CHRISTOPHER D. MARTIN #30613
TALBOT CARMOUCHE MARCELLO
17405 Perkins Rd.
Baton Rouge, LA 70810
Telephone: 225-400-991
Facsimile: 225-448-2568

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the above and foregoing pleading has been served upon all counsel of record by electronic mail, facsimile transmission and/or by placing same in the United States mail, properly addressed and postage prepaid, this 15th day of July, 2022.



Matthew P. Keating

31st JUDICIAL DISTRICT COURT FOR THE PARISH OF JEFFERSON DAVIS

STATE OF LOUISIANA

DOCKET NO. 502-20

DIVISION: C

CASTEX DEVELOPMENT, LLC

VERSUS

ANADARKO PETROLEUM CORPORATION, ET AL.

FILED: _____

**_____
DEPUTY CLERK**

ORDER

Considering the foregoing motion,

IT IS HEREBY ORDERED that Plaintiff's First Supplemental and Amending Petition for Damages be and is hereby filed and the Clerk of Court is directed to accept and file same.

THUS DONE AND SIGNED on this ____ day of _____, 2022, at Jennings, Louisiana.

**_____
HONORABLE STEVE GUNNELL
JUDGE, 31ST JUDICIAL DISTRICT COURT**

31st JUDICIAL DISTRICT COURT FOR THE PARISH OF JEFFERSON DAVIS

STATE OF LOUISIANA

DOCKET NO. 502-20

DIVISION: C

CASTEX DEVELOPMENT, LLC

VERSUS

ANADARKO PETROLEUM CORPORATION, ET AL.

FILED: _____

**_____
DEPUTY CLERK**

FIRST SUPPLEMENTAL AND AMENDING PETITION FOR DAMAGES

COMES NOW, Plaintiff, Castex Development, LLC, to respectfully supplement and amend its original petition for damages, as follows:

I. Amendment to Paragraph 4

To correct the name of party defendant ExxonMobil Oil Corporation in Paragraph 4 of the Original Petition for Damages, and as referred to throughout said petition, to read as follows:

“G. **MOBIL PRODUCING TEXAS & NEW MEXICO, INC.**, a foreign corporation authorized to do business and doing business in the State of Louisiana, which may be served through its registered agent: Corporation Service Company, 501 Louisiana Avenue, Baton Rouge, LA 70802. Mobil Producing Texas & New Mexico, Inc. is named as successor to General Crude Oil Company.”

and

To add the following as an additional party defendant immediately following the list of party defendants labeled (A) – (H) in Paragraph 4 of the petition:

“I. **ENCO RESOURCES, INC.**, a foreign business corporation authorized to do business and doing business in the State of Louisiana, which may be served through its registered agent: Melvin Lopez, 112 Gotts Cove Rd., Iota, LA 70543.”

I. Incorporation of Prior Allegations and Claims

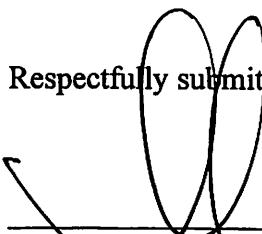
Plaintiff incorporates, reiterates and renews all of the allegations in the Original Petition for Damages, as if pled *in extenso* herein, except as otherwise previously dismissed in this matter.

II. Amendment to Caption

Plaintiffs hereby amend the caption of this matter to replace listed party defendant "ExxonMobil Oil Corporation" with "Mobil Producing Texas & New Mexico, Inc." and to add "Enco Resources, Inc." as a listed party defendant.

WHEREFORE, Plaintiff reiterates the prayer of its Original Petition for Damages and prays that there be judgment herein in its favor and against the defendants, *in solido*, for all damages as are reasonable in the premises together with all legal interest and costs.

Respectfully submitted,



CHAD E. MUDD #25188
DAVID P. BRUCHHUAS #24326
MATTHEW P. KEATING #30911
WESLEY A. ROMERO #33344
MUDD BRUCHHAUS & KEATING, L.L.C.
422 E. College Street, Suite B
Lake Charles, LA 70605
Telephone: (337) 562-2327
Facsimile: (337) 562-2391

and

JOHN H. CARMOUCHE #22294
CHRISTOPHER D. MARTIN #30613
TALBOT CARMOUCHE MARCELLO
17405 Perkins Rd.
Baton Rouge, LA 70810
Telephone: 225-400-991
Facsimile: 225-448-2568

Attorneys for Plaintiff

PLEASE SERVE with the Original and First Supplemental and Amending Petitions:

ENCO RESOURCES, INC., through its registered agent: Melvin Lopez, 112 Gotts Cove Rd., Iota, LA 70543.

MOBIL PRODUCING TEXAS & NEW MEXICO, INC., through its registered agent: Corporation Service Company, 501 Louisiana Avenue, Baton Rouge, LA 70802.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the above and foregoing pleading has been served upon all counsel of record by electronic mail, facsimile transmission and/or by placing same in the United States mail, properly addressed and postage prepaid, this 15th day of July, 2022.



Matthew P. Keating