



UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**In re: Oil Spill by the Oil Rig  
“Deepwater Horizon” in the Gulf  
Of Mexico, on April 20, 2010**

**MDL 2179**

**SECTION: J(2)**

**JUDGE CARL J. BARBIER**

**Applies to:** 2:21-cv-237, Brian J. Donovan  
v. Carl J. Barbier; Stephen J.  
Herman; James P. Roy; Kenneth R.  
Feinberg; and Patrick A. Juneau

**MAG. JUDGE CURRAULT**

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**REPLY IN SUPPORT OF MOTION**  
**FOR INJUNCTIVE RELIEF AND CONSIDERATION OF SANCTIONS**

Defendant Patrick A. Juneau (“Mr. Juneau”), the Court-Appointed Claims Administrator of the Deepwater Horizon Court-Supervised Settlement Program, through undersigned counsel, hereby submits this reply in support of his motion for injunctive relief and consideration of sanctions in the above-referenced proceeding. (Rec. Doc. 27003). Despite Mr. Donovan’s opposition and voluminous exhibits (Rec. Docs. 27035, 27036), he has offered no legitimate reason for his unwarranted and repetitive filings and accusations. Indeed, the nature of the opposition serves to underscore why, unfortunately, the imposition of an injunction and/or sanctions may serve as the only effective means to deter future meritless litigation.<sup>1</sup> For the reasons previously stated in Mr. Juneau’s original memorandum, we respectfully urge the Court to consider an injunction and/or appropriate sanctions.

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<sup>1</sup> We note that this morning, April 28, 2021, Mr. Donovan filed a “Second Motion for Clarification” arguing the fortuity of service. The Court in its Order dated April 27, 2021 (Rec. Doc. 27070) already has addressed Mr. Donovan’s service complaint. We wish to add only that there is no basis to malign opposing parties or their counsel for following the Orders entered in this MDL proceeding for filing and service, or to ascribe an ill motive to them for reading and following those rules.

Respectfully submitted,

*/s/ Richard C. Stanley* \_\_\_\_\_

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capacity as Claims Administrator of the Deepwater  
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**CERTIFICATE OF SERVICE**

I hereby certify that the above and foregoing Reply has been served on All Counsel by electronically uploading the same to Lexis Nexis File & Serve in accordance with Pretrial Order No. 12, as amended, and that the foregoing was electronically filed with the Clerk of Court of the United States District Court for the Eastern District of Louisiana by using the CM/ECF System, which will send a notice of electronic filing in accordance with the procedures established in MDL 2179, on this 28th day of April, 2021.

*/s/ Kathryn W. Munson* \_\_\_\_\_