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TO: Clerk of Court, Iberia Parish

FAX NUMBER: (337) 365-0737

FROM: Kathy C. Arnaud with Blake R. David

B & D File: Genee Romero

DATE: December 3, 2021

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COMMENTS:

Please see attached Petition for Damages. Please file and fax our office confirmation of receipt along with the cost of filing same. Thank you.

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**GENEE BABINEAUX ROMERO,
INDIVIDUALLY AND
ON BEHALF OF B.R. ROMERO**

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DOCKET NUMBER:

16TH JUDICIAL DISTRICT COURT

VERSUS

**ABC INSURANCE COMPANY,
CARGILL, INCORPORATED,
CARGILL DEICING TECHNOLOGY,
AVERY ISLAND INC., WEEKS
ISLAND RENTAL, L.L.C., AMERICAN
MINING SERVICES LLC dba
AMERICAN MINING SERVICES,
LANE ALAN LANCASTER, and
DEAN ANTHONY PONTIFF**

PARISH OF IBERIA

STATE OF LOUISIANA

PETITION

NOW INTO COURT, through undersigned counsel, come GENEÉ BABINEAUX ROMERO, individually and on behalf of B.R. ROMERO (minor child of Rene Joseph Romero, Jr. and Geneé Romero), a resident of the full age of majority, living in the State of Louisiana, Parish of Iberia, who with respect represents:

1.

Made Defendants herein are:

- A. **ABC INSURANCE COMPANY**, upon information and belief, a foreign insurer licensed to do and doing business in the state of Louisiana, which at all times relevant herein provided coverage for the liabilities, faults and acts of CARGILL and its officers, managers, and employees (including but not limited to DEAN ANTHONY PONTIFF and LANE ALAN LANCASTER) ;
- B. **CARGILL, INCORPORATED** (“CARGILL”), upon information and belief, a foreign corporation, domiciled in Wilmington, Delaware incorporated in the laws of the State of Delaware, with its principal business office in Wayzata, Minnesota, licensed to do business in Louisiana, with its principal place of business in Louisiana in Avery Island and whose registered office in Louisiana is located in New Iberia, who at all times pertinent hereto was vicariously liable for the intentional acts of its employees, management and officers;
- C. **CARGILL DEICING TECHNOLOGY** (“CARGILL DEICING”), upon information and belief, a division of Cargill, Incorporated, incorporated in the laws of the State of Delaware and headquartered in North Olmsted, Ohio, who at all times pertinent hereto operated its salt mining operations at Avery Island and was vicariously liable for the intentional acts of its employees, management and officers;
- D. **AVERY ISLAND, INC.** (“AVERY ISLAND”), upon information and belief a foreign corporation, domiciled in Wilmington, Delaware, incorporated under the laws of the State of Delaware, with its principal place of business and its registered office in Avery Island, Louisiana, who at all times leased the Avery Island Salt Mine (16-00509) to CARGILL for its salt mining operations;

- E. **WEEKS ISLAND RENTAL, L.L.C.** (“WEEKS”), upon information and belief, a domestic limited liability company, domiciled in New Iberia, Louisiana, who at all times pertinent hereto provided and dumped dirt and/or other heavy materials on top of the sinkhole at Froggy Bottom that was over the intersection of H-13 and room H-14 where the roof of the mine collapsed;
- F. **AMERICAN MINING SERVICES LLC dba AMERICAN MINING SERVICES** (“AMS), upon information and belief, a foreign corporation, headquartered in Salt Lake City, Utah, a third-party contractor with CARGILL responsible for supplying drilling and blasting consumable products to the mining industry;
- G. **LANE ALAN LANCASTER**, a person of the full age of majority and resident of the Parish of Lafayette, State of Louisiana, who at all times pertinent hereto was in the course and scope of his employment with CARGILL (upon information and belief with the title of General Mine Supervisor); and
- H. **DEAN ANTHONY PONTIFF**, a person of the full age of majority and resident of the Parish of Iberia, State of Louisiana, who at all times pertinent hereto was in the course and scope of his employment with CARGILL (upon information and belief with the title of Grouting Crew Supervisor).

2.

On or about December 14, 2020, Lance Begnaud, age 27, and Rene Romero Jr., age 41, were ordered to enter a known hazardous and barricaded area of the mine (due to past and pending roof collapses) to address flowing water through the roof while in the course and scope of his employment with CARGILL, INCORPORATED and/or CARGILL DEICING TECHNOLOGY at the intersection of H-13 and room H-14 on or around the 700 level of the Avery Island salt mine owned by CARGILL, INCORPORATED and/or CARGILL DEICING TECHNOLOGY at Avery Island in the Parish of Iberia, State of Louisiana, when, as anticipated, the mine roof collapsed on Lance Begnaud and Rene Romero Jr. causing severe and fatal injury to both miners.

3.

The above-described incident occurred at the CARGILL Avery Island salt mine, located at Highway 329 S, Avery Island, Parish of Iberia, State of Louisiana, and is owned and operated by CARGILL.

4.

This tragic loss of life was caused by all Defendants ignoring the known roof collapse hazards, mining regulations, and specifically imperiling the miners killed in a failed attempt to hurriedly and unsafely preserve profitable salt mining operations at the mine.

This December 14, 2020 roof collapse resulted directly from CARGILL's intentional decision to disregard dangerous and unprecedented water leaks and/or ground support system regulations and implement unsafe ground support system policies and procedures such that injury and/or death was inevitable and/or substantially certain to occur to at least one of its miners.

6.

These intentional acts include but are not limited to CARGILL, INCORPORATED and/or CARGILL DEICING TECHNOLOGY's (hereinafter "CARGILL") failing to monitor the ground support system, concealing other roof collapses from authorities, concealing the unprecedented, continuous flow of water in its mine, concealing a sink hole directly above ground at the site of the collapse, removing barricades that were placed to stop work in a dangerous area due to pending roof collapse, ordering overtime work in the hazardous and barricaded off area on the weekend when AMERICAN MINING SERVICES was scheduled to further inspect and address the ceiling collapse issues on the following Monday, and failing to document ground/roof control work.

7.

These intentional acts by CARGILL with respect to the ground control system were part of a greater intentional failure of CARGILL to provide for a safe mine as evidenced by the more than fifty safety violations issued by the Mine Safety and Health Administration (MSHA) to CARGILL in the eleven months preceding this roof collapse, at least fifteen of which were for serious safety violations. On December 3, CARGILL was given an MSHA citation for a "ground conditions" hazard at the mine.¹ At the time of this petition, the MSHA investigation into this fatal event is ongoing.

8.

In fact, the evidence suggests that CARGILL and its managers and officers were more concerned with contesting citations of violations rather than being concerned with mine safety and correcting the known safety deficiencies, making serious injury or death of its miners inevitable and/or substantially certain to occur.

9.

¹ The specific regulation MSNA cited at Avery Island on December 3 states: "Ground conditions that create a hazard to persons shall be taken down or supported before other work or travel is permitted in the affected area. Until corrective work is completed, the area shall be posted with a warning against entry and, when left unattended, a barrier shall be installed to impede unauthorized entry."

The above-described mine collapse and death of Rene Romero Jr. resulted from the intentional acts of CARGILL and of its employees, managers, and/or officers in the following non-exclusive particulars:

- A. Engaging in aggravated conduct constituting intentional acts in that CARGILL management knew that its ground support system was not properly designed, installed, and/or maintained and that said failure would inevitably lead to severe injury and/or death to one of the mine's inhabitants;
- B. Unwarrantable failure to comply with mandatory standards, policies, and regulations that created a workplace substantially certain and/or inevitable to cause severe injury and/or death to miners;
- C. Intentionally designing the ground support system in a manner that was substantially certain and/or inevitable to cause severe injury and/or death to miners;
- D. Intentionally maintaining the ground support system in a manner that was substantially certain and/or inevitable to cause severe injury and/or death to miners;
- E. Intentionally installing the ground support system in a manner that was substantially certain and/or inevitable to cause severe injury and/or death to miners;
- F. Intentionally and willfully failing to report and/or document mine roof collapses in an effort to avoid further citation from MSHA;
- G. Intentionally requiring its grouters/miners to work in areas where it was inevitable and substantially certain that severe injury or death would occur after actual notice of the inevitable and/or substantially certain roof collapses in its mine;
- H. Refusing to make changes after MSHA repeatedly put defendants on actual notice of dangerous ground support system and/or roof control practices;
- I. Ignoring safety concerns of its own management and/or employees who specifically barricaded off this area as unsafe due to past roof collapses and certain future roof collapses and specifically warned it employees not to enter the area due to an impending roof collapse, including but not limited to one miner who at a safety meeting before this incident informed CARGILL that the uncontrolled and increasing torrent of water at the intersection of H-13 and room H-14 was causing roof collapses and making it unsafe to work;
- J. Intentional falsification of records and falsifying roof bolting data;
- K. Intentionally failing to report roof collapses;
- L. In intentionally creating a dangerous workplace for Rene Romero Jr. such that it was substantially certain and/or inevitable that he would suffer severe injury and/or death;
- M. In intentionally failing to provide a safe workplace to Rene Romero Jr., such that it was substantially certain and/or inevitable that he would suffer severe injury and/or death; and

- N. In training and ordering its employees to carry out the above-mentioned intentional acts.

10.

The above-described mine collapse and death of Rene Romero Jr. resulted from the intentional acts of Lane Alan Lancaster, an engineer and General Mine Supervisor at CARGILL's Avery Island salt mine, in the following non-exclusive particulars:

- A. Engaging in aggravated conduct constituting intentional acts in that CARGILL management knew that its ground support system was not properly designed, installed, and/or maintained and that said failure would inevitably lead to severe injury and/or death of one of the mine's inhabitants;
- B. Unwarrantable failure to comply with mandatory standards, policies, and regulations that created a workplace substantially certain and/or inevitable to cause severe injury and/or death to miners;
- C. Intentionally designing the ground support system in a manner that was substantially certain and/or inevitable to cause severe injury and/or death to miners;
- D. Intentionally maintaining the ground support system in a manner that was substantially certain and/or inevitable to cause severe injury and/or death to miners;
- E. Intentionally installing the ground support system in a manner that was substantially certain and/or inevitable to cause severe injury and/or death to miners;
- F. Intentionally and willfully failing to report and/or document mine roof collapses in an effort to avoid further citation from MSHA;
- G. Intentionally requiring miners under his supervision to remove the barricades and ordering Rene Romero Jr. to work in areas where it was inevitable and substantially certain that severe injury or death would occur after actual notice of the inevitable and substantially certain roof collapses in CARGILL's mine;
- H. Refusing to make changes after MSHA repeatedly put defendants on actual notice of dangerous ground support system and/or roof control practices;
- I. Ignoring safety concern of its employee(s) who specifically warned of the imminence of a roof collapse but who was/were sent back down into the mine minutes before the December 14, 2020 roof collapse;
- J. Intentional misleading MSHA inspectors about the dangerous conditions of the Cargill Avery Island salt mine;
- K. Intentionally failing to report roof collapses;
- L. Ordering employees to not comment on and/or report roof collapses to authorities;
- M. Personally participating in all acts and/or omissions of CARGILL listed above;

- N. Intentionally ignoring the safety concerns and complaints of CARGILL miners;
- O. Intentionally and repeatedly misleading MSHA investigators about CARGILL practices, policies, procedures, and incidents, including but not limited to bolt installation and maintenance practices, roof collapses, roof control system, and the safe implementation of the ground control system;
- P. Failing to take corrective action after actual knowledge of improper equipment, improper bolting practices, lack of sag monitors, and improper ground support system; and
- Q. Training, supervising, monitoring, hiring and/or encouraging CARGILL employees to participate in all acts and/or omissions of CARGILL listed above.

11.

The above-described mine collapse and death of Rene Romero Jr. resulted from the intentional acts of DEAN ANTHONY PONTIFF, foreman of the grouting crew of which Rene Romero Jr. was a member, at CARGILL Avery Island salt mine, in the following non-exclusive particulars:

- A. Engaging in aggravated conduct constituting intentional acts in that CARGILL management knew that its ground support system was not properly designed, installed, and/or maintained and that said failure would inevitably lead to severe injury and/or death of one of the mine's inhabitants;
- B. Unwarrantable failure to comply with mandatory standards, policies, and regulations that created a workplace substantially certain and/or inevitable to cause severe injury and/or death to miners;
- C. Intentionally designing the ground support system in a manner that was substantially certain and/or inevitable to cause severe injury and/or death to miners;
- D. Intentionally maintaining the ground support system in a manner that was substantially certain and/or inevitable to cause severe injury and/or death to miners;
- E. Intentionally installing the ground support system in a manner that was substantially certain and/or inevitable to cause severe injury and/or death to miners;
- F. Intentionally and willfully failing to report and/or document mine roof collapses in an effort to avoid further citation from MSHA;
- G. Requiring miners under his supervision, including Rene Romero Jr., to work at the intersection of H-13 and room H-14 where he was specifically told by a Cargill employee at the pre-tower meeting it was inevitable and substantially certain that severe injury or death would occur if they kept working in the torrential leaking of water on December 14, 2020 in CARGILL's mine;
- H. Advising members of his crew shortly before the roof collapsed on December 14, 2020 to "run towards the berm" if this collapses;
- I. Refusing to make changes after MSHA repeatedly put defendants on actual notice of dangerous ground support system and/or roof control practices;

- J. Ignoring safety concern of its employees who specifically warned of the imminence of a roof collapse but who was sent back down into the mine minutes before the December 14, 2020 roof collapse;
- K. Intentional falsification of records;
- L. Intentionally failing to report roof collapses;
- M. Ordering employees to not comment on and/or report roof collapses to authorities;
- N. Personally participating in all acts and/or omissions of CARGILL listed above;
- O. Intentionally ignoring the safety concerns and complaints of CARGILL miners;
- P. Intentionally and repeatedly misleading MSHA investigators about CARGILL practices, policies, procedures, and incidents, including but not limited to bolt installation and maintenance practices, roof collapses, roof control system, and the safe implementation of the ground control system;
- Q. Failing to take corrective action after actual knowledge of improper equipment, improper bolting practices, lack of sag monitors, and improper ground support system; and
- R. Training, supervising, monitoring, hiring and/or encouraging CARGILL employees to participate in all acts and/or omissions of CARGILL listed above.

12.

CARGILL is vicariously and legally liable for any and all intentional acts and/or omissions committed by its employees, managers and/or supervisors in the course and scope of their employment with CARGILL (including but not limited to LANE ALAN LANCASTER and DEAN ANTHONY PONTIFF) which are the direct cause of the roof collapse and fatal injuries sustained by Rene Romero Jr. *See* Louisiana Civil Code articles 2317 and 2320; LA. R.S. 23:1032.

13.

Alternatively and/or additionally, the above-described mine collapse and death of Rene Romero Jr. resulted from the negligence of AVERY ISLAND INC. (AND ALL OTHER DEFENDANTS), in the following non-exclusive particulars:

- A. Failing to maintain the surface of the property it leased to CARGILL for its salt mine operation, such that a sink hole developed in Froggy Bottom right over the area of the roof collapse;
- B. Failing to report, inspect, document and maintain its mine and the grounds above its mine;
- C. In ordering additional weight and dirt to be added above the roof of its mine where known sinkholes were draining into the mine, leading to roof collapse

conditions;

- D. In failing to address safely the sinkhole and ground control/roof collapse issues at and above its salt mine in Avery Island;
- E. In knowingly covering up an active sinkhole with materials that were adding weight to an area it knew was directly above a salt mine and workers below;
- F. Failing to follow any engineered plan as it repeatedly dumped dirt and materials above the salt mine occupied by workers;
- G. In adding weight above the roof of the salt mine such that it caused and/or contributed to the roof collapse killing two miners on December 14, 2020; and
- H. In otherwise failing to address the cause of the sinkhole and mine perforation, and instead covering up, complicating, and increasing the hazardous conditions in the mine.

14.

Alternatively and/or additionally, the above-described mine collapse and death of Rene Romero Jr. resulted from the negligence of WEEKS ISLAND RENTAL, L.L.C. (AND ALL OTHER DEFENDANTS), in the following non-exclusive particulars:

- A. Failing to properly dump truckloads of dirt and/or other heavy materials to cover the sinkhole in Froggy Bottom right over the area of the roof collapse;
- B. Failing to report, inspect, document and maintain its mine and the grounds above the salt mine;
- C. In delivering additional weight and dirt to be added above the roof of an active salt mine where known sinkholes were draining into the mine, leading to roof collapse conditions;
- D. In failing to safely address the sinkhole and ground control/roof collapse issues at and above the salt mine in Avery Island;
- E. In knowingly covering up an active sinkhole with materials that were adding weight to an area it knew was directly above a salt mine and workers below;
- F. Failing to follow any engineered plan as it repeatedly dumped dirt and materials above the salt mine occupied by workers;
- G. In adding weight above the roof of the salt mine such that it caused and/or contributed to the roof collapse killing two miners on December 14, 2020; and
- H. In otherwise failing to address the cause of the sinkhole and mine perforation, and instead covering up, complicating, and increasing the hazardous conditions in the mine.

15.

Alternatively and/or additionally, the above-described mine collapse and death of Rene Romero Jr. resulted from the negligence of AMERICAN MINING SERVICE (AND ALL OTHER

- B. Failure to create a proper roof control plan for CARGILL;
- C. Failure to properly implement the ground support system at the above-described CARGILL Avery Island salt mine;
- D. Creating a faulty ground support system for CARGILL;
- E. Failure to train CARGILL employees concerning proper bolting techniques;
- F. Failure to warn of potential hazards of improper bolt installation;
- G. Failure to properly instruct CARGILL concerning proper bolt installation and/or maintenance;
- H. Failure to ensure that CARGILL employees knew how to install and maintain AMS bolts;
- I. In otherwise failing to design, implement, install and/or maintain a safe ground support system;
- J. In otherwise failing to warn, instruct, train and educate CARGILL and its employees concerning a proper ground support system;
- K. In failing to report and correct Cargill's fraudulent and unsafe roof bolting and ground support systems;
- L. Designing, developing, manufacturing, testing, packaging, advertising, promoting marketing, distributing, labeling and/or selling defective equipment (bolts, drills, roof control components, etc.) that were unfit for their intended use;
- M. The subject product manufactured and/or supplied by AMS was defective in construction or composition in that when it left the hands of Defendant, it deviated in a material way from Defendant's manufacturing performance standards and/or it differed from otherwise identical products manufactured to the same design formula;
- N. The subject product manufactured and supplied by Defendant was defective in design or formulation in that, when it left the hands of the Defendant, it did not conform to federal and/or state requirements, and the foreseeable risk of the product exceeded the benefits associated with its design or formulation, or it was more dangerous than an ordinary consumer would expect. In particular, the product was unfit for securing the roof of a salt mine and was unreasonably dangerous in design as provided by La. R.S. 9:2800.56;
- O. The subject product manufactured and supplied by Defendant was defective due to inadequate warning or instruction because Defendant failed to conform with federal and/or state requirements for labels, warnings, and instructions, and/or alternatively, Defendant knew or should have known, that the product created significant risks of serious bodily harm and/or death to miners and Defendant failed to adequately warn CARGILL and/or their employees of such risks. The subject product was unreasonably dangerous because an adequate warning was not provided as required pursuant to La. R.S. 9:2800.57; and
- P. At the time of the making of the express warranties, Defendant knew or should have known of the purpose for which the subject product was to be

used and warranted the same to be, in all respects, fit, safe, and effective and proper for such purpose. The subject product was unreasonably dangerous because it failed to conform to an express warranty of the defendant as provided by La. R.S. 9:2800.58.

16.

As a result of the above-described collapse, decedent Rene Romero Jr. suffered devastating injuries and died.

17.

Rene Romero Jr. died as a result of this incident. Rene Romero Jr. was survived solely by his spouse, GENE BABINEAUX ROMERO, and his one (1) minor children, B.R. ROMERO. Thus, petitioners are the only persons entitled to seek survival and wrongful death damages (including lost earnings and earning capacity) for Rene Romero Jr.'s death pursuant to Louisiana Civil Code articles 2315.1 and 2315.2.

18.

As a direct and proximate result of the Defendants' conduct (including but not limited to intentional acts), GENE BABINEAUX ROMERO suffered the following injuries and damages, all of which entitles petitioner to recover a sum reasonable within the premises:

- a. Loss of the positive benefits flowing from the love, affection, comfort, companionship, and society that GENE BABINEAUX ROMERO, in reasonable probability, would have received from her husband, Rene Romero Jr., had he lived, both past and future;
- b. Emotional pain, grief, torment, and suffering experienced by GENE BABINEAUX ROMERO because of the death of her husband, Rene Romero Jr., both past and future;
- c. Loss of care, maintenance, support, services, advice, counsel, inheritance and reasonable contributions of a pecuniary value that GENE BABINEAUX ROMERO, in reasonable probability, would have received from her husband, Rene Romero Jr., had he lived, both past and future; and
- d. The conscious physical and emotional pain, torment, and suffering experienced by Rene Romero Jr., before his death as a result of the occurrence in question.

19.

As a direct and proximate result of the Defendants' conduct (including but not limited to intentional acts), B.R. ROMERO suffered the following injuries and damages, all of which entitles petitioner to recover a sum reasonable within the premises:

- a. Loss of the positive benefits flowing from the love, affection, comfort, companionship, and society that B.R. ROMERO, in reasonable probability, would have received from her father, Rene Romero Jr., had he lived, both past and future;

- b. Emotional pain, grief, torment, and suffering experienced by B.R. ROMERO because of the death of her father, Rene Romero Jr., both past and future;
- c. Loss of care, maintenance, support, services, advice, counsel, inheritance and reasonable contributions of a pecuniary value that B.R. ROMERO, in reasonable probability, would have received from her father, Rene Romero Jr., had he lived, both past and future; and
- d. The conscious physical and emotional pain, torment, and suffering experienced by Rene Romero, Jr., before his death as a result of the occurrence in question.

22.

As a result of the above-described incident, Rene Romero Jr. sustained serious and painful pre-impact and post-impact pre-death pain and suffering, mental anxiety and distress.

23.

As a result of the death of Rene Romero Jr., petitioners each sustained loss of society, companionship, nurture, consortium, and support and have suffered mental anxiety and grief, all of which entitles each of them to recover a sum reasonable within the premises.

24.

Petitioners are entitled to recover reasonable and adequate compensation for the above-described past, present and future losses sustained by each petitioner personally, sustained by Rene Romero Jr. prior to his death, and the expenses of Rene Romero Jr.'s medical treatment, funeral and burial.

25.

In addition to the causes of action afforded the petitioners mentioned in the above-numbered paragraphs, GENE BABINEAUX ROMERO, individually and obo B.R. ROMERO are entitled to *Lejeune* and/or bystander damages under Louisiana Civil Code article 2315.6 due to the severe grief and mental anguish each of them suffered after coming upon the scene of the incident soon thereafter, and for the suffering they incurred during the long search and rescue/recovery efforts.

26.

In addition to any and all compensatory damages sought in this matter, Defendants' conduct described above warrants punitive and/or exemplary damages, and petitioners pray for any and all punitive and/or exemplary damages available under any applicable state law and/or federal law.

At this time, petitioners seek damages in excess of the jurisdictional amount requirement for trial by jury under Louisiana law, exclusive of interests and costs.

WHEREFORE, petitioners, GENEÉ BABINEAUX ROMERO, individually and on behalf of B.R. ROMERO, pray that a certified copy of this complaint be served upon Defendants, CARGILL, INCORPORATED, CARGILL DEICING TECHNOLOGY, AVERY ISLAND INC, WEEKS ISLAND RENTAL, L.L.C., AMERICAN MINING SERVICES, LLC dba AMERICAN MINING SERVICES, LANE ALAN LANCASTER, and DEAN ANTHONY PONTIFF, and that after due proceedings are had there be judgment herein in favor of petitioners, GENEÉ BABINEAUX ROMERO, individually and on behalf of B.R. ROMERO, and against Defendants, CARGILL, INCORPORATED, CARGILL DEICING TECHNOLOGY, AVERY ISLAND INC, WEEKS ISLAND RENTAL, L.L.C., AMERICAN MINING SERVICES, LLC dba AMERICAN MINING SERVICES, LANE ALAN LANCASTER, and DEAN ANTHONY PONTIFF, jointly, severally and in solido in a sum reasonable in the premises together with legal interest from the date of judicial demand until paid and for all costs of these proceedings.

Respectfully submitted,

BROUSSARD & DAVID, LLC

Blake R. David (No. 27427)
 D'Ann R. Penner (No. 35545)
 557 Jefferson Street
 Post Office Box 3524
 Lafayette, Louisiana 70502-3524
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 GENEÉ BABINEAUX ROMERO,
 individually and obo B.R. ROMERO

PLEASE SERVE:

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 Theodore Haik
 1017 East Dale Street
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CARGILL DEICING TECHNOLOGY

A division of Cargill Incorporated

Through Cargill's Registered Agent

Theodore Haik

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AVERY ISLAND INC.

Through its Registered Agent

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WEEKS ISLAND RENTAL, L.L.C.

Through its Registered Agent

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Via the Long-Arm Statute

Through its Registered Agent

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DEAN ANTHONY PONTIFF

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* * * Communication Result Report (Dec. 3. 2021 3:36PM) * * *

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TO: Clerk of Court, Iberia Parish
 FAX NUMBER: (337) 365-0737
 FROM: Kathy C. Arnsdorf with Blake R. David
 B & D File: Genes Romero
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