

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF LOUISIANA

MEXICAN GULF FISHING COMPANY, <i>et al.</i>	:	Civil Action No. 2:20-cv-2312
	:	
	:	Section "E" (1)
	:	
<i>Plaintiffs,</i>	:	Judge Suzie Morgan
	:	
v.	:	Magistrate Judge Janis Van Meerveld
	:	
U.S. DEPARTMENT OF COMMERCE, <i>et al.</i>	:	
	:	
	:	Plaintiffs' Motion for Summary Judgment
	:	
<i>Defendants.</i>	:	

PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT

COME NOW, Plaintiffs, Captain Billy Wells and Mexican Gulf Shipping Company ("Mexican Gulf"), Captain Allen Walburn and A&B Charters, Inc. ("A&B"), Captain Kraig Dafcik, Captain Joseph Dobin and Captain Joey D. Charters ("Joey D. Charters"), Captain Frank Ventimiglia and Ventimiglia Charters, and Captain Jim Rinckey and Fishing Charters of Naples ("Fishing Charters"), submit this motion for Summary Judgment on all Counts of the First Amended Complaint (ECF No. 54), pursuant to Federal Rule of Civil Procedure 56 for themselves and the class that they represent against all Defendants.

An accompanying memorandum in support of this motion and a Statement of Undisputed Facts is submitted with this motion.

Dated: August 11, 2021

Respectfully submitted,

**GORDON, ARATA, MONTGOMERY,
BARNETT, McCOLLAM, DUPLANTIS
& EAGAN, LLC**

By: /s/ _____
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NEW CIVIL LIBERTIES ALLIANCE

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CERTIFICATE OF SERVICE

I do hereby certify that on this 11th day of August 2021, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system which will send a notice of electronic filing to all attorneys of record.

/s/ John J. Vecchione
John J. Vecchione