

## La. C.C. Art. 656

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[Louisiana Statutes, Annotated by LexisNexis\(TM\)](#) > [LOUISIANA CIVIL CODE](#) > [BOOK 2. THINGS AND THE DIFFERENT MODIFICATIONS OF OWNERSHIP](#) > [CODE TITLE 4. PREDIAL SERVITUDES](#) > [CHAPTER 2. NATURAL SERVITUDES](#)

### Art. 656. Obligations of the owners

The owner of the servient estate may not do anything to prevent the flow of the water. The owner of the dominant estate may not do anything to render the servitude more burdensome.

### History

Acts 1977, No. 514, § 1.

### Annotations

### Commentary

### LexisNexis (R) Notes

### COMMENTARY

1977.

(a) This provision reproduces the substance of the first paragraph of [Article 660 of the Louisiana Civil Code](#) of 1870. It does not change the law. Louisiana jurisprudence interpreting Article 660 continues to be relevant.

(b) Article 660(1) of the 1870 Code declares that "[i]t is a servitude due by the estate situated below to receive the waters which run naturally from the estate situated above, *provided the industry of man has not been used to create that servitude*" (emphasis added). Note error in English translation of French text; "been used to create that servitude" should be "contributed to the flow". ccccccThe proposed provision follows the English text of the original article.

(c) According to a Louisiana decision, [Civil Code Articles 660](#) and [661](#) of the 1870 Code do not apply to subterranean waters. [Adams v. Grigsby, 152 So.2d 619 \(La.App. 2d Cir. 1963\)](#), writ refused [244 La. 662, 153 So.2d 880 \(1963\)](#).

### Case Notes

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**LexisNexis (R) Notes****Civil Procedure: Remedies: Injunctions: General Overview**

1. Owner of a servient estate may do nothing to prevent the flow of water, and injunctive relief is available to the owner of the dominant estate to require the owner of the servient estate to remove obstacles, which interfere with natural drainage; because injunctive relief is a distinctly different form of relief than that afforded for damages to private property for public purposes, the prescriptive period provided in [La. Rev. Stat. Ann. § 9:5624](#) does not bar claims for injunctive relief. [Eubanks v. Bayou D'Arbonne Lake Watershed Dist., La. App. 32334, 742 So. 2d 113, 1999 La. App. LEXIS 2455](#) (La.App. 2 Cir. Sept. 22 1999), writ denied by [La. 99-3026, 751 So. 2d 887, 1999 La. LEXIS 3498](#) (La. Dec. 17, 1999).

**Civil Procedure: Remedies: Injunctions: Elements: General Overview**

2. Plantation owner was not entitled to an injunction barring an adjacent owner from making its servitude of drain over the owner's land more burdensome; it did not show that artificial works by the adjacent owner had already increased water flow on its land, and a claim that such works might take place in the future was not a basis for an injunction. [Nicholson v. Holloway Planting Co., 255 LA. 1, 229 So. 2d 679, 1969 La. LEXIS 3203](#) (1969).

**Civil Procedure: Remedies: Injunctions: Mandatory Injunctions**

3. Landowners, whose land had been damaged by permanent flooding after a series of locks and dams had been built by the U.S. Government, had a direct action against the Louisiana Department of Transportation and Development (DOTD), under the Direct Action Statute, [La. Rev. Stat. Ann. § 22:655](#), but since the United States was the operator and title owner of the locks and dams and given that it owned the land on which the constructions stood, the DOTD could not be enjoined when it never had legal authority over the constructions and when it never owned the servient estate. [Cooper v. La. Dep't of Pub. Works, La. App. 03-1074, 870 So. 2d 315, 2004 La. App. LEXIS 481](#) (La.App. 3 Cir. Mar. 3 2004).

**Civil Procedure: Remedies: Injunctions: Preliminary & Temporary Injunctions**

4. Because obstructions built to slow water flowing through a creek interfered with a natural servitude of drainage under [La. Civ. Code Ann. arts. 655, 656](#) and infringed on real rights, the issuance of a preliminary injunction ordering their removal under [La. Code Civ. Proc. Ann. art. 3663](#), which does not require a showing of irreparable harm, was not erroneous. [Richland Parish Police Jury v. Debnam, 92 So. 3d 487, 2012 La. App. LEXIS 524](#) (La.App. 2 Cir. 2012).

**Constitutional Law: Bill of Rights: Fundamental Rights: Eminent Domain & Takings**

5. When the Louisiana Department of Transportation and Development (DOTD) reconstructed two bridges and raised a highway, the property owners' land was flooded, and the trial court did not err in its findings that that the work resulted in an inverse condemnation, even though the property was already flooded as DOTD had changed the natural course of the water. [Taylor v. State, La. App. 03-219, 879 So. 2d 307, 2004 La. App. LEXIS 1598](#) (La.App. 3 Cir. June 23 2004), writ denied by [La. 2004-1887, 885 So. 2d 595, 2004 La. LEXIS 3251](#) (La. Oct. 29, 2004).

**Contracts Law: Third Parties: Beneficiaries: Claims & Enforcement**

6. Landowners, whose land had been damaged by permanent flooding after a series of locks and dams had been built by the U.S. Government, had a direct action against the Louisiana Department of Transportation and Development (DOTD), under the Direct Action Statute, [La. Rev. Stat. Ann. § 22:655](#), but since the United States was the operator and title owner of the locks and dams and given that it owned the land on which the constructions stood, the DOTD could not be enjoined when it never had legal authority over the constructions and when it never owned the servient estate. [Cooper v. La. Dep't of Pub. Works, La. App. 03-1074, 870 So. 2d 315, 2004 La. App. LEXIS 481](#) (La.App. 3 Cir. Mar. 3 2004).

**Governments: State & Territorial Governments: Claims By & Against**

7. Landowners, whose land had been damaged by permanent flooding after a series of locks and dams had been built by the U.S. Government, had a direct action against the Louisiana Department of Transportation and Development (DOTD), under the Direct Action Statute, [La. Rev. Stat. Ann. § 22:655](#), but since the United States was the operator and title owner of the locks and dams and given that it owned the land on which the constructions stood,

the DOTD could not be enjoined when it never had legal authority over the constructions and when it never owned the servient estate. [Cooper v. La. Dep't of Pub. Works, La. App. 03-1074, 870 So. 2d 315, 2004 La. App. LEXIS 481 \(La.App. 3 Cir. Mar. 3 2004\)](#).

### **Real Property Law: Adjoining Landowners: General Overview**

8. In an action involving adjacent landowners concerning the drainage of their respective properties after one landowner filled a culvert with dirt, the court erred in finding that [La. Civ. Code Ann. art. 655](#) was applicable, because it only referenced natural drainage, and the culvert was not a feature of the natural situation of the properties but was a manmade device, even though the flooding was caused by natural rainwater; similarly, because of the complete lack of proof as to the levels of the properties and the directions of the flow, the complaining landowner failed to carry his burden under [La. Civ. Code Ann. art. 656](#) of proving that his estate was the dominant one and that the other landowner's estate was the servient one. [Aydell v. Morales, La. App. 96-2797, 707 So. 2d 158, 1998 La. App. LEXIS 332 \(La.App. 1 Cir. Feb. 20 1998\)](#).

9. Servient-estate owners could not be required to accept chlorinated effluent from the oxidation pool of the dominant-estate owners; even chlorinated effluent constituted a burden on the servient estate in contravention of [La. Civ. Code Ann. art. 656](#). [Thigpen v. Moss, 504 So. 2d 664, 1987 La. App. LEXIS 9039 \(La.App. 3 Cir. 1987\)](#).

10. Homeowners could not recover property damages under [La. Civ. Code Ann. art. 656](#) where they failed to prove that the improvements made by the lessees on the leased land, which adjoined and was elevated above the homeowners' land, changed or made the natural drainage in the area more burdensome and, thus, caused the flooding of the house. [Sweet v. C.B.G. Pontiac-Buick-Olds-GMC, Inc., 463 So. 2d 82, 1985 La. App. LEXIS 8086 \(La.App. 3 Cir. 1985\)](#).

11. Dominant lessee had a natural drainage servitude of a servient lessee's property because an estate situated below was bound to receive the surface waters that flowed naturally from an estate situated above unless an act of man created the flow. [Walters v. Thrasher, 381 So. 2d 557, 1980 La. App. LEXIS 3590 \(La.App. 2 Cir. 1980\)](#).

12. Dominant estate owner's operation of a pump rendered the natural servitude of drain more burdensome because the servient estate was forced to receive water that would not normally be flowing at a time when it could least afford to do so, such as when water levels on the servient estate were already high. [David v. Dixie Rice Agricultural Corp., 379 So. 2d 62, 1979 La. App. LEXIS 3424 \(La.App. 3 Cir. 1979\)](#), writ of certiorari denied by [382 So. 2d 166, 1980 La. LEXIS 7142 \(La. 1980\)](#).

13. Aside from any natural servitude of drain under former La. Civ. Code Ann. art. 660 (now [La. Civ. Code Ann. art. 656](#)), the evidence showed that a neighbor's estate had acquired, by prescriptive use, a conventional or voluntary servitude of drain through a ditch across a landowner's property, where continuous and apparent servitudes could be acquired by title or by a possession of 10 years; the servitudes of drain and aqueduct are noted as examples of continuous servitudes. [Wild v. Le Blanc, 191 So. 2d 146, 1966 La. App. LEXIS 4529 \(La.App. 3 Cir. 1966\)](#).

### **Real Property Law: Adjoining Landowners: Water**

14. Trial court did not err in awarding judgment to defendants in plaintiffs' action, which alleged that their home and lot suffered water damage after defendants modified the adjoining lot to construct a home; experts stated that in some places, plaintiffs' flowerbeds were covering weep holes of the house and that water standing in the flowerbeds was the source of their water damage. [Fiebelkorn v. Alford, 105 So. 3d 110, 2012 La. App. LEXIS 1159 \(La.App. 2 Cir. 2012\)](#).

15. Trial court's finding that a dominant landowner blocked ditches around his property and changed the natural flow of the water, causing flooding on the servient estate, was not manifestly erroneous, and the dominant owner did not acquire a servitude of passage to drain sewerage through 30 years' acquisitive prescription. An award of \$ 20,000 damages to the servient owner was not excessive. [Carnaggio v. Cambre, 84 So. 3d 631, 2011 La. App. LEXIS 1518 \(La.App. 5 Cir. 2011\)](#).

### **Real Property Law: Adverse Possession: Elements of Adverse Claims**

16. Trial court's finding that a dominant landowner blocked ditches around his property and changed the natural flow of the water, causing flooding on the servient estate, was not manifestly erroneous, and the dominant owner did not acquire a servitude of passage to drain sewerage through 30 years' acquisitive prescription. An award of \$ 20,000 damages to the servient owner was not excessive. [Carnaggio v. Cambre, 84 So. 3d 631, 2011 La. App. LEXIS 1518 \(La.App. 5 Cir. 2011\)](#).

**Real Property Law: Eminent Domain Proceedings: General Overview**

17. Activities upon the dominant estate, which improve its drainage and increase the speed with which water flows across the servient estate, but which do not increase the volume of water received by the servient estate, do not fall within the prohibitive provisions of former La. Civ. Code Ann. art. 660 (now [La. Civ. Code Ann. arts. 655 and 656](#)) where the proprietor above can do nothing but the estate below may be rendered more burdensome. [Key v. Louisiana, Dep't of Highways, 357 So. 2d 1230, 1978 La. App. LEXIS 3180 \(La.App. 2 Cir. 1978\)](#), writ of certiorari denied by [359 So. 2d 1309, 1978 La. LEXIS 6264 \(La. 1978\)](#).

**Real Property Law: Estates: Concurrent Ownership: General Overview**

18. Earthen levy that a landowner built along his common property line with his neighbor did not cause flooding on the neighbor's property because the levy deflected excess water into an adjacent swamp, not onto the neighbor's crops; although the landowner's property was technically the lower estate, the levy did not violate the requirements of former La. Civ. Code Ann. art. 660 (now [La. Civ. Code Ann. arts. 655 and 656](#)) because the area's natural drainage was primarily into the swamp even without the influence of the levy. [Pickett v. Taylor, 316 So. 2d 778, 1975 La. App. LEXIS 4457 \(La.App. 3 Cir. 1975\)](#), writ of certiorari denied by [321 So. 2d 366, 1975 La. LEXIS 4688 \(La. 1975\)](#).

**Real Property Law: Estates: Present Estates: Fee Simple Estates**

19. Servient-estate owners could not be required to accept chlorinated effluent from the oxidation pool of the dominant-estate owners; even chlorinated effluent constituted a burden on the servient estate in contravention of [La. Civ. Code Ann. art. 656](#). [Thigpen v. Moss, 504 So. 2d 664, 1987 La. App. LEXIS 9039 \(La.App. 3 Cir. 1987\)](#).

**Real Property Law: Limited Use Rights: Easements: General Overview**

20. Because obstructions built to slow water flowing through a creek interfered with a natural servitude of drainage under [La. Civ. Code Ann. arts. 655, 656](#) and infringed on real rights, the issuance of a preliminary injunction ordering their removal under [La. Code Civ. Proc. Ann. art. 3663](#), which does not require a showing of irreparable harm, was not erroneous. [Richland Parish Police Jury v. Debnam, 92 So. 3d 487, 2012 La. App. LEXIS 524 \(La.App. 2 Cir. 2012\)](#).

21. Finding that the purchaser's claim for injunctive relief had prescribed pursuant to [La. Civ. Code Ann. art. 758](#) was improper because prescription did not run against natural servitudes; [La. Civ. Code Ann. arts. 655 and 656](#) gave an owner of a dominant estate a right to a natural servitude of drain and also gave the owner of the servient estate a correlative right not to have his natural servitude made more burdensome; the operation of the landfill on the dominant estate was the action that had made the natural servitude more burdensome and was thus susceptible to injunction. [Roberson v. Lincoln Parish Police Jury, La. App. 39418, 899 So. 2d 636, 2005 La. App. LEXIS 635 \(La.App. 2 Cir. Mar. 23 2005\)](#).

22. Record supported the trial court's finding that appellant's property was at a higher elevation than appellee's property, and the natural drainage went across appellee's property, and therefore, appellee's property was the servient estate and appellant's property was the dominant estate for a natural servitude of drain, which was not dependent on any contract pursuant to [La. Civ. Code Ann. art. 655](#); the trial court did not err in holding that appellee was able to satisfy its obligation to prove a natural servitude in favor of appellant by installing culverts, which was construction necessary for the use of the servitude pursuant to [La. Civ. Code Ann. art. 744](#), which was a right appellant had pursuant to [La. Civ. Code Ann. art. 743](#), and the installation was not likely to prevent the flow of water in violation of [La. Civ. Code Ann. art. 656](#). [Palace Props. v. Sizeler Hammond Square Ltd. P'ship, La. App. 2001-2812, 839 So. 2d 82, 2002 La. App. LEXIS 4002 \(La.App. 1 Cir. Dec. 30 2002\)](#), writ denied by [La. 2002-2935, 834 So. 2d 443, 2003 La. LEXIS 83 \(La. Jan. 10, 2003\)](#), writ of certiorari denied by [La. 2003-0306, 840 So. 2d 1219, 2003 La. LEXIS 1006 \(La. Apr. 4, 2003\)](#).

23. Dominant estate owner's operation of a pump rendered the natural servitude of drain more burdensome because the servient estate was forced to receive water that would not normally be flowing at a time when it could least afford to do so, such as when water levels on the servient estate were already high. [David v. Dixie Rice Agricultural Corp., 379 So. 2d 62, 1979 La. App. LEXIS 3424 \(La.App. 3 Cir. 1979\)](#), writ of certiorari denied by [382 So. 2d 166, 1980 La. LEXIS 7142 \(La. 1980\)](#).

24. Under the terms of a deed, a gravel lane leading from the grantor's house over the grantee's country club golf course to a road was a predial servitude that ran with the land rather than a personal servitude that expired with the grantor's death; the trial court erred in restricting the use of the servitude to light vehicular traffic suitable to meet the needs of a single-family residence because the servitude would continue to exist even if the dominant estate were

divided in the future. [McLure v. Alexandria Golf & Country Club, Inc., 344 So. 2d 1080, 1977 La. App. LEXIS 5024 \(La.App. 3 Cir. 1977\).](#)

25. Aside from any natural servitude of drain under former La. Civ. Code Ann. art. 660 (now [La. Civ. Code Ann. art. 656](#)), the evidence showed that a neighbor's estate had acquired, by prescriptive use, a conventional or voluntary servitude of drain through a ditch across a landowner's property, where continuous and apparent servitudes could be acquired by title or by a possession of 10 years; the servitudes of drain and aqueduct are noted as examples of continuous servitudes. [Wild v. Le Blanc, 191 So. 2d 146, 1966 La. App. LEXIS 4529 \(La.App. 3 Cir. 1966\).](#)

#### **Real Property Law: Restrictive Covenants: General Overview**

26. Owner of a servient estate may do nothing to prevent the flow of water, and injunctive relief is available to the owner of the dominant estate to require the owner of the servient estate to remove obstacles, which interfere with natural drainage; because injunctive relief is a distinctly different form of relief than that afforded for damages to private property for public purposes, the prescriptive period provided in [La. Rev. Stat. Ann. § 9:5624](#) does not bar claims for injunctive relief. [Eubanks v. Bayou D'Arbonne Lake Watershed Dist., La. App. 32334, 742 So. 2d 113, 1999 La. App. LEXIS 2455 \(La.App. 2 Cir. Sept. 22 1999\), writ denied by La. 99-3026, 751 So. 2d 887, 1999 La. LEXIS 3498 \(La. Dec. 17, 1999\).](#)

#### **Real Property Law: Water Rights: General Overview**

27. Finding that the purchaser's claim for injunctive relief had prescribed pursuant to [La. Civ. Code Ann. art. 758](#) was improper because prescription did not run against natural servitudes; [La. Civ. Code Ann. arts. 655 and 656](#) gave an owner of a dominant estate a right to a natural servitude of drain and also gave the owner of the servient estate a correlative right not to have his natural servitude made more burdensome; the operation of the landfill on the dominant estate was the action that had made the natural servitude more burdensome and was thus susceptible to injunction. [Roberson v. Lincoln Parish Police Jury, La. App. 39418, 899 So. 2d 636, 2005 La. App. LEXIS 635 \(La.App. 2 Cir. Mar. 23 2005\).](#)

28. Record supported the trial court's finding that appellant's property was at a higher elevation than appellee's property, and the natural drainage went across appellee's property, and therefore, appellee's property was the servient estate and appellant's property was the dominant estate for a natural servitude of drain, which was not dependent on any contract pursuant to [La. Civ. Code Ann. art. 655](#); the trial court did not err in holding that appellee was able to satisfy its obligation to prove a natural servitude in favor of appellant by installing culverts, which was construction necessary for the use of the servitude pursuant to [La. Civ. Code Ann. art. 744](#), which was a right appellant had pursuant to [La. Civ. Code Ann. art. 743](#), and the installation was not likely to prevent the flow of water in violation of [La. Civ. Code Ann. art. 656](#). [Palace Props. v. Sizeler Hammond Square Ltd. P'ship, La. App. 2001-2812, 839 So. 2d 82, 2002 La. App. LEXIS 4002 \(La.App. 1 Cir. Dec. 30 2002\), writ denied by La. 2002-2935, 834 So. 2d 443, 2003 La. LEXIS 83 \(La. Jan. 10, 2003\), writ of certiorari denied by La. 2003-0306, 840 So. 2d 1219, 2003 La. LEXIS 1006 \(La. Apr. 4, 2003\).](#)

29. Construction of the Louisiana Department of Transportation and Development (DOTD) at the very least altered the natural draining of surface waters and the DOTD bore a duty to conform its construction in accordance with the natural flow of water; where it breached this duty, and the risk of flooding was one within the scope of the protection afforded by law, DOTD was liable for the farmer's economic losses. [State v. Jones, La. App. 02-279, 827 So. 2d 615, 2002 La. App. LEXIS 2994 \(La.App. 3 Cir. Oct. 2 2002\), writ denied by La. 2002-2701, 833 So. 2d 332, 2002 La. LEXIS 3743 \(La. Dec. 19, 2002\).](#)

30. Dominant lessee had a natural drainage servitude of a servient lessee's property because an estate situated below was bound to receive the surface waters that flowed naturally from an estate situated above unless an act of man created the flow. [Walters v. Thrasher, 381 So. 2d 557, 1980 La. App. LEXIS 3590 \(La.App. 2 Cir. 1980\).](#)

31. Earthen levy that a landowner built along his common property line with his neighbor did not cause flooding on the neighbor's property because the levy deflected excess water into an adjacent swamp, not onto the neighbor's crops; although the landowner's property was technically the lower estate, the levy did not violate the requirements of former La. Civ. Code Ann. art. 660 (now [La. Civ. Code Ann. arts. 655 and 656](#)) because the area's natural drainage was primarily into the swamp even without the influence of the levy. [Pickett v. Taylor, 316 So. 2d 778, 1975 La. App. LEXIS 4457 \(La.App. 3 Cir. 1975\), writ of certiorari denied by 321 So. 2d 366, 1975 La. LEXIS 4688 \(La. 1975\).](#)

32. Plantation owner was not entitled to an injunction barring an adjacent owner from making its servitude of drain over the owner's land more burdensome; it did not show that artificial works by the adjacent owner had already increased water flow on its land, and a claim that such works might take place in the future was not a basis for an

injunction. [Nicholson v. Holloway Planting Co., 255 LA. 1, 229 So. 2d 679, 1969 La. LEXIS 3203 \(1969\).](#)

33. Adjacent owner had a servitude of drain through channels running across the property of an owner to the south because the properties sloped from the northeast to the southwest and the channels were of natural origin; the owner was legally obligated to receive surface waters which flowed naturally through the channels, but only such as would have ordinarily run there in view of the configuration of the land. [Nicholson v. Holloway Planting Co., 255 LA. 1, 229 So. 2d 679, 1969 La. LEXIS 3203 \(1969\).](#)

34. River bed running alongside a landowner's property was a natural drain that served adjacent lands, and thus the landowner's property along the river bed owed a servitude of natural drainage to the developer's lands, and the developer had the right to change the method whereby the drainage waters were gathered and delivered onto the servient estate where the developer did not cause any greater amount of water to flow onto the landowner's property. [Freestate Industrial Dev. Co. v. T. & H., Inc., 209 So. 2d 568, 1968 La. App. LEXIS 5367 \(La.App. 2 Cir. 1968\), writ of certiorari denied by 252 LA. 172, 210 So. 2d 54, 1968 La. LEXIS 3071 \(1968\).](#)

#### **Torts: Damages: General Overview**

35. Construction of the Louisiana Department of Transportation and Development (DOTD) at the very least altered the natural draining of surface waters and the DOTD bore a duty to conform its construction in accordance with the natural flow of water; where it breached this duty, and the risk of flooding was one within the scope of the protection afforded by law, DOTD was liable for the farmer's economic losses. [State v. Jones, La. App. 02-279, 827 So. 2d 615, 2002 La. App. LEXIS 2994 \(La.App. 3 Cir. Oct. 2 2002\), writ denied by La. 2002-2701, 833 So. 2d 332, 2002 La. LEXIS 3743 \(La. Dec. 19, 2002\).](#)

#### **Torts: Premises Liability & Property: General Premises Liability: General Overview**

36. Homeowners could not recover property damages under [La. Civ. Code Ann. art. 656](#) where they failed to prove that the improvements made by the lessees on the leased land, which adjoined and was elevated above the homeowners' land, changed or made the natural drainage in the area more burdensome and, thus, caused the flooding of the house. [Sweet v. C.B.G. Pontiac-Buick-Olds-GMC, Inc., 463 So. 2d 82, 1985 La. App. LEXIS 8086 \(La.App. 3 Cir. 1985\).](#)

37. Landowners, whose properties adjoined a storage warehouse complex, could not recover their flood damages from the owner of the complex, where the landowners' homes were flooded after an unusually heavy rain, the natural flow of the surface water was from the complex toward the landowners' properties in the rear of the complex, the complex had swales so that most of the water flowed toward the front of the complex, and the landowners' expert could not state that the construction of the complex caused the landowners' homes to flood. [Patterson v. Garic, 411 So. 2d 1091, 1982 La. App. LEXIS 6665 \(La.App. 4 Cir. 1982\), writ of certiorari denied by 415 So. 2d 950, 1982 La. LEXIS 11255 \(La. 1982\).](#)

### **Research References & Practice Aids**

#### **LexisNexis (R) Notes**

#### **TREATISES AND LAW REVIEWS**

#### **Louisiana Law Reviews:**

Developments in the Law: A Symposium: Expropriation. [43 La. L. Rev. 439](#) (November, 1982).

Article: Public Records & Property Rights. [56 La. L. Rev. 535](#) (Spring, 1996).

Article: Predial Servitudes; Creation by Title: Louisiana and Comparative Law. [45 Tul. L. Rev. 459](#) (April, 1971).

Note: Louisiana Mineral Law--Effect of Compulsory Unitization on Partially Included Royalty Interest. [45 Tul. L. Rev. 656](#) (April, 1971).