**Federal Real Property and Business Litigation Report**

**Volume VI, Issue 20**

**May 20, 2023**

**Manuel Farach**

**GP Vincent II v. Estate of Edgar Beard**, Case No. 21-16555 (9th Cir. 2023).

A final judgment resolving a contribution claim under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (“CERCLA”) between two prior owners of environmentally contaminated real property does not bar a subsequent purchaser, who takes title with full knowledge of the condition of the land and that judgment, from pursuing a CERCLA cost recovery claim if the earlier settlement affected a different parcel of real property.

**Global Network Management, Ltd. v. Centurylink Latin American Solutions, LLC**, Case No. 21-13719 (11th Cir. 2023).

The owner of a data center may be liable under bailment theories for loss of equipment placed in the data center by a lessee, even if the lessee also has access.