

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
GEORGIA, ROME DIVISION

Earl Parris, Jr. v. 3M Company, et al.

Parris · No. 4:21-CV-40-TWT · Decided March 13, 2026

SUMMARY

The United States District Court for the Northern District of Georgia denied Earl Parris, Jr. and the City of Summerville’s motion to exclude the expert testimony of Laurentius Marais. The court held that Marais’s analysis of PFAS exposure and cancer rates was relevant and based on a sufficiently reliable methodology under Federal Rule of Evidence 702. The court also rejected exclusion under Rule 403, finding that the testimony’s probative value was not substantially outweighed by the risk of jury confusion or misleading the jury.

CASE DETAILS

COURT	United States District Court for the Northern District of Georgia, Rome Division
WRITING FOR THE COURT	Thomas W. Thrash, Jr.
JURISDICTION	United States District Court for the Northern District of Georgia, Rome Division
DECIDED	March 13, 2026
DOCKET	4:21-CV-40-TWT
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff and intervenor-plaintiff moved before trial to exclude defense expert testimony under Federal Rules of Evidence 702 and 403.
STANDARD OF REVIEW	The court applied the admissibility and gatekeeping standards under Federal Rule of Evidence 702, including qualification, reliability, and helpfulness, and the balancing test under Rule 403.
PRECEDENTIAL VALUE	unpublished district court opinion

TOPICS

- daubert standard
- expert testimony
- evidence
- clean water act
- environmental law

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Marais was qualified and whether his methodology was sufficiently reliable and properly applied under Federal Rule of Evidence 702.
2. Whether Marais's opinions were relevant and helpful to the trier of fact under Rule 702.
3. Whether the probative value of Marais's testimony was substantially outweighed by a danger of confusing the issues or misleading the jury under Rule 403.

HOLDINGS

1. Marais's opinions concerning the relationship between PFAS exposure and cancer were relevant and potentially helpful to the jury because the plaintiffs placed PFAS-related health risks at issue in their negligence, wanton-conduct, punitive-damages, and public-nuisance claims.
2. Marais's methodology was sufficiently reliable under Rule 702, notwithstanding asserted problems involving data interpretation, county-city comparisons, latency, residency, and treatment location.
3. The court declined to exclude Marais's testimony under Rule 403 because its probative value was not substantially outweighed by a danger of confusing the issues or misleading the jury.

KEY QUOTATIONS

“The purpose of Daubert is to ensure that an expert “employs in the courtroom the same level of intellectual rigor that characterizes the practice of an expert in the relevant field.”” (at 8)

“Datasets may be imperfect at times, but that is not grounds to render an entire analysis unreliable.” (at 9)

FACTUAL BACKGROUND

The action concerns alleged contamination of surface waters and drinking water in Chattooga County, Georgia, with per- and polyfluoroalkyl substances (PFAS). Parris receives potable water from the Summerville Public Works and Utilities Department, and the City of Summerville uses Raccoon Creek as the main source of its municipal water supply. Defense expert Laurentius Marais analyzed county-level cancer data and PFAS levels in public water supplies and opined that there was no statistically detectable, empirically significant association between PFAS exposure and kidney or testicular cancer rates.

PROCEDURAL HISTORY

Earl Parris, Jr. brought a Clean Water Act action concerning alleged PFAS contamination of surface and drinking water in Chattooga County, Georgia. The City of Summerville intervened as a plaintiff. The court considered the plaintiffs' motion to exclude the testimony of defense expert Laurentius Marais and denied the motion.

DISPOSITION

other

CASES CITED

- 766 F.3d 1296, 1304 (11th Cir. 2014)
- 509 U.S. 579, 591-94, 597 (1993)
- 730 F.3d 1278, 1282 (11th Cir. 2013)
- 387 F.3d 1244, 1260, 1262 (11th Cir. 2004) (en banc)
- 526 U.S. 137, 152-53 (1999)
- 813 F.3d 983, 988 (11th Cir. 2016)
- 526 F. Supp. 3d 1360, 1367 (N.D. Ga. 2021)
- 459 F.3d 1276, 1295 (11th Cir. 2022)

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