

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Stephen Jones, et al. v. Perdue Farms Inc., et al.

Jones · No. SAG-25-02445 · Decided March 30, 2026

SUMMARY

The United States District Court for the District of Maryland denied Plaintiffs Stephen Jones and Richard Renshaw’s motion for reconsideration of an earlier order addressing their Resource Conservation and Recovery Act claims against Perdue entities. The court held that Plaintiffs had not shown clear error causing manifest injustice in the prior conclusions concerning environmental standing and pleading an imminent and substantial endangerment under 42 U.S.C. § 6972(a)(1)(B). The court also determined that *Trinity American Corp. v. EPA* was not dispositive because it involved a different statute and had not been cited during the original briefing.

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	Stephanie A. Gallagher
JURISDICTION	United States District Court for the District of Maryland
DECIDED	March 30, 2026
DOCKET	SAG-25-02445
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiffs moved under Federal Rule of Civil Procedure 54(b) for reconsideration of the court's prior interlocutory order granting in part and denying in part defendants' motion to dismiss their Resource Conservation and Recovery Act claims.
STANDARD OF REVIEW	A district court may revise an interlocutory order under Rule 54(b) only upon substantially different evidence, an intervening change in applicable law, or clear error causing manifest injustice. The court reviewed its prior ruling for clear error causing manifest injustice because plaintiffs relied on neither newly revealed evidence nor an intervening change in law.
PRECEDENTIAL VALUE	Unpublished district court memorandum opinion; persuasive value only and not binding precedent.

PARTIES

Stephen Jones, Richard Renshaw v. Perdue Farms Inc., Perdue Agribusiness LLC, Perdue Foods LLC

TOPICS

motion for reconsideration

rcra

standing

hazardous waste

civil procedure

PRACTICE AREAS

Environmental law

Federal civil procedure

Standing

Statutory interpretation

QUESTIONS PRESENTED

1. Whether the court should reconsider its prior interlocutory dismissal under Federal Rule of Civil Procedure 54(b) based on clear error causing manifest injustice.
2. Whether plaintiffs who failed to plead environmental standing could rely on alleged environmental harms to support an RCRA imminent-and-substantial-endangerment claim.
3. Whether allegations that plaintiffs' drinking water was contaminated, without allegations that plaintiffs or others were drinking or otherwise using the water, sufficiently pleaded an imminent and substantial endangerment to health under 42 U.S.C. § 6972(a)(1)(B).

HOLDINGS

1. Reconsideration was not warranted because plaintiffs identified neither substantially different evidence nor an intervening change in law and failed to show clear error causing manifest injustice.
2. Plaintiffs could not seek relief through a substantive claim based on environmental harms for which they had not established standing.
3. Plaintiffs did not demonstrate clear error warranting reconsideration because they failed to allege that they or anyone else was drinking or otherwise using the contaminated water, and the principal authority they relied on involved a different statute.

KEY QUOTATIONS

“Accordingly, a district court may revise an interlocutory order under the same circumstances as it may depart from the law of the case: (1) a subsequent proceeding that reveals substantially different evidence, (2) an intervening change in the applicable law, or (3) “clear error causing manifest injustice.”” (II)

“Because Plaintiffs could not demonstrate standing as to harms to the environment, they cannot seek relief through a substantive claim based on such harms.” (III.A)

FACTUAL BACKGROUND

Perdue Agribusiness LLC and Perdue Foods LLC operate an agribusiness facility in Salisbury, Maryland, owned by Perdue Farms Inc. Plaintiffs alleged that defendants disposed of solid waste containing harmful chemicals, contaminating groundwater and surface water and affecting private wells, including plaintiffs' wells. Testing

allegedly showed chemical concentrations exceeding safe drinking-water levels, while defendants supplied bottled water and offered point-of-entry treatment systems for affected wells.

PROCEDURAL HISTORY

Plaintiffs brought an RCRA action alleging that defendants' disposal of solid waste contaminated groundwater and surface water. The court previously concluded that plaintiffs lacked environmental standing and had failed to plead an imminent and substantial endangerment claim under 42 U.S.C. § 6972(a)(1)(B). Plaintiffs moved for reconsideration, arguing that the court should consider environmental harms and that contamination of their drinking water sufficiently pleaded endangerment despite allegations that they were not drinking the contaminated water. The court denied reconsideration.

DISPOSITION

other

CASES CITED

- Am. Canoe Ass'n v. Murphy Farms, Inc., 326 F.3d 505, 515 (4th Cir. 2003)
- U.S. Tobacco Coop. Inc. v. Big S. Wholesale of Va., LLC, 899 F.3d 236, 256-57 (4th Cir. 2018)
- Carlson v. Bos. Sci. Corp., 856 F.3d 320, 325 (4th Cir. 2017)
- Outdoor Amusement Bus. Ass'n v. Dep't of Homeland Sec., 983 F.3d 671, 683 n.6 (4th Cir. 2020)
- Trinity American Corp. v. United States Environmental Protection Agency, 150 F.3d 389, 392, 399-400 (4th Cir. 1998)
- Lopez v. United States, No. PWG-14-2156, 2016 WL 915621, at *2 (D. Md. Mar. 10, 2016)

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