

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF  
ILLINOIS, EASTERN DIVISION

**Bernadette Williams, et al. v. State Farm Mutual Automobile  
Insurance Company and State Farm Fire and Casualty Company**

Williams v. State Farm · No. 22 C 1422 · Decided March 10, 2026

SUMMARY

The United States District Court for the Northern District of Illinois granted Defendants’ motion to exclude the testimony of Plaintiffs’ expert Kirk Felix concerning used-car pricing trends. The Court held that Felix lacked sufficient qualifications and that his opinions were not based on sufficient facts, reliable data, or reliable methodology under Federal Rule of Evidence 702.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                    |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Northern District of Illinois, Eastern Division                                                                                                                                                                                                               |
| WRITING FOR THE COURT | Virginia M. Kendall                                                                                                                                                                                                                                                                                |
| JURISDICTION          | United States District Court for the Northern District of Illinois, Eastern Division                                                                                                                                                                                                               |
| DECIDED               | March 10, 2026                                                                                                                                                                                                                                                                                     |
| DOCKET                | 22 C 1422                                                                                                                                                                                                                                                                                          |
| DISPOSITION           | other                                                                                                                                                                                                                                                                                              |
| PROCEDURAL POSTURE    | Defendants moved under Federal Rule of Evidence 702 and Daubert to exclude the proposed testimony of plaintiffs' expert Kirk Felix concerning used-vehicle pricing trends, dealer pricing practices, and the relationship between advertised and transaction prices. The court granted the motion. |
| STANDARD OF REVIEW    | Federal Rule of Evidence 702 and Daubert reliability and qualification analysis; the proponent bears the burden of demonstrating admissibility by a preponderance of the evidence.                                                                                                                 |
| PRECEDENTIAL VALUE    | unpublished, nonprecedential district-court opinion                                                                                                                                                                                                                                                |
| PARTIES               | Bernadette Williams, et al., on behalf of themselves and all others similarly situated v. State Farm Mutual Automobile Insurance Company, State Farm Fire and Casualty Company                                                                                                                     |

## TOPICS

expert testimony

daubert standard

evidence

insurance

civil procedure

## PRACTICE AREAS

evidence

insurance litigation

class actions

## QUESTIONS PRESENTED

1. Whether Kirk Felix was qualified under Federal Rule of Evidence 702 to offer opinions concerning used-vehicle pricing, dealership pricing strategies, consumer negotiation behavior, and the Autosource methodology.
2. Whether Felix's proposed testimony was based on sufficient facts or data and reliable principles and methods under Federal Rule of Evidence 702 and Daubert.

## HOLDINGS

1. Felix was not qualified under Rule 702 to testify authoritatively about the process for pricing and selling used automobiles, dealership pricing strategies, consumer negotiation behavior, or the Autosource methodology because his general dealership-consulting experience did not provide a sufficient foundation for those specific opinions.
2. Even if Felix were qualified, his testimony was inadmissible because plaintiffs did not show by a preponderance of the evidence that it was based on sufficient facts or data or was the product of reliable principles and methods.

## KEY QUOTATIONS

*“It is hard to square this experience with the scope of Plaintiffs’ proposed testimony, which seeks to authoritatively describe the process for pricing and selling used automobiles.”*

*“The critical inquiry is whether there is a connection between the data employed and the opinion offered.”*

*“This Court finds that Felix’s application of his methodology to the circumstances of the case have not met the Rule 702 threshold, in accordance with the 2023 amendments.”*

## FACTUAL BACKGROUND

Plaintiffs retained Kirk Felix to opine that used vehicles generally sell at or near their online advertised cash prices and that internet-based comparison tools have reduced downward negotiation from advertised prices. Felix's experience consisted primarily of facilitating dealership discussion groups and consulting for NCM Associates; he had never sold a used car, operated a used-car dealership, priced used vehicles for sale, or managed people who did so. His proposed opinions were based largely on memories of anecdotal discussions rather than documented data, a survey, Audatex sales information, or materials establishing that the relevant valuation methods were equivalent.

## PROCEDURAL HISTORY

The case is a putative class action involving State Farm's valuation of insured vehicles. After previously ruling on a motion concerning another expert, the court considered State Farm's motion to exclude Kirk Felix's testimony and adopted the background and legal standard from its earlier ruling. The court granted the motion because Felix lacked qualifications to offer the proposed specialized opinions and, independently, because his opinions were not based on sufficient data or reliable methodology.

## DISPOSITION

other

## CASES CITED

- *Gulick v. State Farm Mutual Automobile Insurance Co.*, 780 F. Supp. 3d 1169, 1183 (D. Kan. 2025)
- *United States v. Truitt*, 938 F.3d 885, 889-90 (7th Cir. 2019)
- *Gayton v. McCoy*, 593 F.3d 610, 617 (7th Cir. 2010)
- *United States v. Conn*, 297 F.3d 548, 554 (7th Cir. 2002)
- *Carroll v. Otis Elevator Co.*, 896 F.2d 210, 212 (7th Cir. 1990)
- *Lapsley v. Xtek, Inc.*, 689 F.3d 802, 805, 814 (7th Cir. 2012)
- *Burton v. E.I. du Pont de Nemours & Co., Inc.*, 994 F.3d 791, 826 (7th Cir. 2021)
- *United States v. Protho*, 41 F.4th 812, 822 (7th Cir. 2022)
- *Manpower, Inc. v. Insurance Co. of Pennsylvania*, 732 F.3d 796, 806 (7th Cir. 2013)
- *Potts v. Manos*, 2017 WL 4365948, at \*5 (N.D. Ill. Sept. 29, 2017)
- *Deimer v. Cincinnati Sub-Zero Products, Inc.*, 58 F.3d 341, 344 (7th Cir. 1995)