

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 20, 2026

SUMMARY

The United States District Court for the Northern District of Georgia denied defendants’ motion to exclude the expert testimony of Andrew Stahl in a Clean Water Act action concerning PFAS contamination of surface and drinking water in Chattooga County, Georgia. The court held that challenges to Stahl’s upstream, downstream, and groundwater sampling data primarily concerned the weight of his opinions and were appropriate for cross-examination rather than exclusion under Federal Rule of Evidence 702. The opinion and order was signed by Judge Thomas W. Thrash, Jr., on March 20, 2026.

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 20, 2026
DOCKET	4:21-CV-40-TWT
DISPOSITION	other
PROCEDURAL POSTURE	Defendants moved to exclude the expert testimony of Andrew Stahl under Federal Rule of Evidence 702 in this Clean Water Act action.
STANDARD OF REVIEW	The court applied the Federal Rule of Evidence 702 and Daubert reliability standard, evaluating whether the expert was qualified, whether the methodology was reliable, and whether the testimony would assist the trier of fact. The proponent bears the burden of establishing admissibility by a preponderance of the evidence.
PRECEDENTIAL VALUE	Unknown; district court opinion
PARTIES	Earl Parris, Jr. v. Daikin America, Inc., 3M Company, E.I. DuPont de Nemours and Company, The Chemours Company

TOPICS

expert testimony

daubert standard

evidence

clean water act

environmental law

PRACTICE AREAS

evidence

environmental law

clean water act

civil procedure

QUESTIONS PRESENTED

1. Whether Stahl's expert testimony was sufficiently reliable under Federal Rule of Evidence 702 and Daubert despite defendants' challenges to upstream sampling data.
2. Whether Stahl's expert testimony was sufficiently reliable despite allegedly inconsistent downstream PFAS concentrations.
3. Whether Stahl's groundwater sampling methodology was sufficiently reliable despite high turbidity readings and alleged noncompliance with EPA groundwater-sampling guidance.

HOLDINGS

1. Stahl's opinions were sufficiently supported under Federal Rule of Evidence 702 despite PFAS detections in samples taken upstream of the sludge-application fields. Defendants' challenges to his interpretation of the samples were principally matters for cross-examination and competing evidence, not exclusion.
2. The downstream sampling inconsistencies identified by defendants did not require exclusion of Stahl's testimony.
3. Stahl's groundwater sampling methodology was reliable under Rule 702 despite high turbidity readings and defendants' reliance on EPA guidance recommending lower turbidity.

KEY QUOTATIONS

“This gatekeeping role, however, is not intended to supplant the adversary system or the role of the jury in determining the persuasiveness of an expert’s testimony.” (2)

“make certain that an expert . . . employs in the courtroom the same level of intellectual rigor that characterizes the practice of an expert in the relevant field.” (5)

“For the reasons set forth above, the Court DENIES Defendants Daikin America, Inc., 3M Company, E.I. DuPont de Nemours, The Chemours Company’s Motion to Exclude the Expert Testimony of Andrew Stahl [Doc. 884].” (14)

FACTUAL BACKGROUND

The action concerns alleged PFAS contamination of surface waters and drinking water in Chattooga County, Georgia. Parris receives municipal drinking water from Summerville, whose water supply is drawn primarily from Raccoon Creek. Plaintiff's theory is that PFAS-laden wastewater was treated at the Town of Trion's water pollution control plant and that treated sludge was applied to farms in the Raccoon Creek watershed. Expert Andrew Stahl opined that PFAS from sludge applied to identified properties entered and continues to enter

Raccoon Creek through transport pathways supported by surface-water, groundwater, soil, and sediment sampling.

PROCEDURAL HISTORY

Plaintiff brought this action alleging that defendants contaminated surface and drinking water with PFAS. The City of Summerville intervened as a plaintiff. Defendants moved to exclude plaintiff's expert, Andrew Stahl, challenging the reliability of his upstream, downstream, and groundwater sampling and analyses. The district court denied the motion.

DISPOSITION

other

CASES CITED

- 766 F.3d 1296, 1304 (11th Cir. 2014)
- 509 U.S. 579, 592-94, 597 (1993)
- 730 F.3d 1278, 1282 (11th Cir. 2013)
- 387 F.3d 1244, 1260 (11th Cir. 2004) (en banc)
- 526 U.S. 137, 152-53 (1999)
- 522 U.S. 136, 146 (1997)
- 740 F. Supp. 3d 1172, 1178 n.3 (N.D. Fla. 2024)