

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

Noel Reyes-Muñoz, et al. v. Puerto Rico Aqueduct & Sewer Authority

Reyes-Muñoz · No. 3:19-cv-02131-JAW-HRV · Decided April 7, 2026

SUMMARY

The United States District Court for the District of Puerto Rico denied without prejudice Plaintiffs’ motion in limine to exclude the expert testimony of environmental engineer José A. Martí-Carvajal under Federal Rule of Evidence 702. The Court held that Martí was qualified and that his methodology and opinions were sufficiently reliable and relevant, while concluding that Plaintiffs’ challenges primarily concerned the weight and credibility of the testimony and could be addressed through cross-examination, contrary evidence, and jury instructions.

CASE DETAILS

COURT	United States District Court for the District of Puerto Rico
WRITING FOR THE COURT	John A. Woodcock, Jr.
JURISDICTION	United States District Court for the District of Puerto Rico
DECIDED	April 7, 2026
DOCKET	3:19-cv-02131-JAW-HRV
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiffs moved in limine under Federal Rule of Evidence 702 to exclude the report and testimony of defendant's rebuttal expert engineer. The district court denied the motion by dismissing it without prejudice.
STANDARD OF REVIEW	The district court applied its gatekeeping function under Federal Rule of Evidence 702 and reviewed the admissibility of rebuttal expert testimony under Federal Rule of Civil Procedure 26(a)(2)(D)(ii). The determination of proper rebuttal evidence lies within the district court's sound discretion.
PRECEDENTIAL VALUE	unpublished
PARTIES	Noel Reyes-Muñoz, et al. v. Puerto Rico Aqueduct & Sewer Authority

TOPICS

- expert testimony
- daubert standard
- motion in limine
- evidence
- civil procedure

PRACTICE AREAS

evidence

civil procedure

environmental law

QUESTIONS PRESENTED

1. Whether José A. Martí-Carvajal was qualified under Federal Rule of Evidence 702 to offer the challenged expert opinions.
2. Whether Martí's rebuttal methodology and opinions satisfied Rule 702's requirements of relevance, sufficient factual basis, reliable principles and methods, and reliable application.
3. Whether plaintiffs' challenges to Martí's credentials, methodology, factual foundation, and alleged legal conclusions warranted exclusion of his expert testimony before trial.
4. Whether Martí's testimony was proper rebuttal evidence under Federal Rule of Civil Procedure 26(a)(2)(D)(ii).

HOLDINGS

1. Martí was sufficiently qualified by his education, professional credentials, and decades of experience in wastewater systems, environmental matters, and regulatory compliance to express the proffered expert opinions.
2. The challenged rebuttal testimony satisfied Rule 702 because Martí applied established environmental-engineering principles to the opposing expert's analysis and the court found no impermissible analytical gap between the available data and his opinions.
3. The challenges did not justify exclusion because they primarily concerned the weight and credibility of the testimony and could be tested through cross-examination, contrary expert evidence, and jury instructions.
4. The proposed testimony was proper rebuttal evidence because it addressed the same subject matter as the opposing expert's testimony and was intended to contradict or rebut that testimony.

KEY QUOTATIONS

"Plaintiffs' various challenges to Mr. Martí's credentials, his report's methodology, and the evidence relied upon in his report, attack the weight and credibility of his testimony that is best left to the jury's assessment."
(Discussion)

"The Court DISMISSES without prejudice Plaintiffs' Motion in Limine to Exclude the Expert Testimony of Engineer José Martí under Federal Rule of Evidence 702 (ECF No. 243)." (Conclusion)

FACTUAL BACKGROUND

PRASA designated professional environmental engineer José A. Martí-Carvajal as a rebuttal expert concerning PRASA's operational practices, maintenance efforts, and reporting related to sanitary sewer overflows and compliance with provisions of a consent decree. Martí had graduate and master's-level engineering education, professional engineering registrations in Puerto Rico and Massachusetts, professional memberships, and decades of wastewater, environmental, and regulatory-compliance experience. Plaintiffs challenged his report and

anticipated testimony as lacking a sufficient factual foundation, relying on unreliable methodology and assumptions, ignoring contradictory evidence, and offering improper legal conclusions.

PROCEDURAL HISTORY

Plaintiffs filed the motion in limine on November 17, 2025, seeking to exclude the testimony and report of PRASA expert José A. Martí-Carvajal. PRASA opposed the motion on December 19, 2025. The court concluded that Martí was qualified and that his methodology and opinions were sufficiently relevant and reliable for admission, while treating plaintiffs' challenges primarily as matters of weight and credibility for cross-examination and the jury.

DISPOSITION

dismissed

CASES CITED

- Daubert v. Merrell Dow Pharmaceuticals, Inc., 509 U.S. 579 (1993)
- Ceballos-Germosén v. Sociedad Para La Asistencia Legal, No. 3:16-cv-02944-JAW, 2022 U.S. Dist. LEXIS 197064 (D.P.R. Oct. 27, 2022)
- Lubanski v. Coleco Industries, Inc., 929 F.2d 42, 47 (1st Cir. 1991)
- ZipBy USA LLC v. Parzych, Nos. 24-1494, 24-1500, 24-1586, 2026 U.S. App. LEXIS 8326, at *7 (1st Cir. Mar. 19, 2026)
- Lawes v. CSA Architects & Engineers LLP, 963 F.3d 72, 97, 99 (1st Cir. 2020)
- Rodríguez v. Hospital San Cristobal, Inc., 91 F.4th 59, 70-71 (1st Cir. 2024)
- General Electric Co. v. Joiner, 522 U.S. 136, 146 (1997)
- United States v. Jackson, 58 F.4th 541, 550-51 (1st Cir. 2024)
- Milward v. Acuity Specialty Products Group, Inc., 639 F.3d 11, 14-15, 22 (1st Cir. 2011)
- Glass Dimensions, Inc. ex rel. Glass Dimensions, Inc. Profit Sharing Plan & Trust v. State Street Bank & Trust Co., 290 F.R.D. 11, 16 (D. Mass. 2013)
- Packgen v. Berry Plastics Corp., 46 F. Supp. 3d 92, 109-117 (D. Me. 2014)
- Carmichael v. Verso Paper, LLC, 679 F. Supp. 2d 109, 119 (D. Me. 2010)
- Nieves-Villanueva v. Soto-Rivera, 133 F.3d 92, 99 (1st Cir. 1998)
- United States v. Newman, 49 F.3d 1, 7 (1st Cir. 1995)
- FERC v. Silkman, No. 1:16-cv-00205-JAW, 2019 U.S. Dist. LEXIS 208135, at *1-2 (D. Me. Dec. 2, 2019)

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