

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION**

**EARL PARRIS, JR., Individually,  
and on Behalf of a Class of Persons  
Similarly Situated,**

**Plaintiff,**

**City of SUMMERVILLE,  
GEORGIA,**

**Intervenor-Plaintiff,**

**v.**

**3M COMPANY, *et al.*,**

**Defendants.**

**Case No.: 4:21-cv-00040-TWT**

**UNOPPOSED MOTION FOR FINAL APPROVAL  
OF PARTIAL CLASS ACTION SETTLEMENT  
WITH HUNTSMAN INTERNATIONAL, LLC**

Plaintiff Class Representative Earl Parris, Jr., on behalf of himself and the proposed Class, has entered into a Class Action Settlement Agreement (“Settlement Agreement”) resolving all the claims against Defendant Huntsman International, LLC (“Huntsman”), for which Plaintiff seeks final approval. Attached as Exhibit 1. The settlement is structured to provide common relief and benefit to all members of the proposed Class through an injunction that will create a fund administered by a Class Settlement Administrator for the provision of temporary drinking water to Class Members while the Summerville water system is upgraded. The Settlement

Agreement leaves Class claims against the remaining Defendants for further litigation.<sup>1</sup> Huntsman does not oppose this motion.

Under Rule 23(e)(1) of the Federal Rules of Civil Procedure, the settlement of the claims of the Class Representative and the Class is subject to the approval of the Court. In the interest of providing the Court a fuller context of the Settlement Agreement, the City of Summerville and Huntsman have also entered a conditional settlement of the City's claims against Huntsman, under which Huntsman would pay an agreed sum to the City to be applied toward upgrades to the City's water treatment systems. That settlement is subject to this Class Action Settlement being approved and becoming final and effective.

The Court entered a Preliminary Approval Order for the Huntsman Class Settlement on March 5, 2025, Doc. 809, and the Notice of Class Settlement was provided to Class Members in accordance with the Notice Plan and the Court's Order. The Fairness Hearing is set for June 11, 2025.

After notice was provided to the Class Members, three objections were received. A letter was served on behalf of two objectors by two law firms on April

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<sup>1</sup> Plaintiff on behalf of the Class has also entered settlement agreements with Defendants Pulcra Chemicals, LLC, which has received final approval, *see* Doc. 849, and with Mount Vernon Mills, Inc., and the Town of Trion, Georgia, which has been preliminarily approved by the Court. *See* Doc. 810. A fairness hearing is also set for the Mount Vernon/Trion Class Settlement on June 11, 2025. Parris, individually, has an agreement in principle with Mount Vernon Mills and Trion to resolve the Clean Water Act and Resource Conservation and Recovery Act citizen suit claims against them, which will result soon in the filing of a proposed consent decree for the Court's review.

7, 2025 [*See* Doc. 840]. These objections were withdrawn by letter filed with the Court on May 14, 2025. The other objection was a letter sent by Class Member Mr. Cortez Knowles, who states he has kidney disease which he believes has resulted from consumption of drinking water contaminated with PFAS. [*See* Doc. 833-1].<sup>2</sup> Because the Settlement Agreement does not release claims for personal injuries, Mr. Knowles is free to pursue his claim if he chooses to, and the objection should not affect the Class Settlement.

In addition, this Motion requests this Court to appoint Mr. Edgar Gentle, III, as the Settlement Administrator for the Huntsman Settlement, based upon his qualifications and experience. A separate Motion for an Award of Attorney Fees, Class Notice Fees, and Litigation Expenses has been filed by Plaintiff for the Court's approval, to which Huntsman does not object.

Accordingly, pursuant to Rule 23, Plaintiff moves the Court to enter an Order:

- a) certifying the Class under Rule 23(b)(2) for settlement purposes with Earl Parris, Jr., as the Class Representative and the undersigned Plaintiff's attorneys as Class Counsel;
- b) granting final approval of the Settlement Agreement under Rule 23(e)(1);

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<sup>2</sup> The objection letter sent by Mr. Knowles was untimely.

c) directing the payment by Huntsman of \$750,000 (Seven Hundred Fifty Thousand Dollars) to the Qualified Settlement Fund established for the Pulcra Settlement;

d) appointing Mr. Edward Gentle, III, as Settlement Administrator for the Huntsman funds;

e) awarding Plaintiff and Class Counsel attorney fees, notice fees, and litigation expenses, pursuant to a separate motion filed with the Court;

f) ordering that under the Settlement Agreement, Plaintiff and the Class Members have released, waived, compromised, settled, and discharged all Released Claims against Huntsman;

g) enjoining further litigation by the Plaintiff and Class Members against Huntsman with respect to the Released Claims;

h) entering the Final Approval Order as a final judgment; and

i) reserving for this Court exclusive and continuing jurisdiction over the interpretation, performance, implementation, enforcement, and administration of the Settlement Agreement and the Court's orders in this action.

Plaintiff's Memorandum in Support of this Motion is attached, as is a Proposed Final Approval Order.

Respectfully submitted.

/s/ Gary A. Davis

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ATTORNEYS FOR PLAINTIFF EARL  
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SETTLEMENT CLASS

**CERTIFICATE OF COMPLIANCE**

Pursuant to Northern District of Georgia Civil Local Rule 7.1(D), the undersigned counsel certifies that the foregoing filing is prepared in Times New Roman point font, as mandated in Local Rule 5.1(C).

/s/ Gary A. Davis

Gary A. Davis  
Attorney for Plaintiff

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that the foregoing document was electronically filed with the Clerk of Court using the CM/ECF system, which automatically serves notification of such filing to all counsel of record.

This 22<sup>nd</sup> day of May 2025.

/s/ Gary A. Davis

Gary A. Davis

Attorney for Plaintiff