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Is Daubert in Jeopardy?
A Review of Expert Admissibility Status
in the United States
April 22, 2021

HOST



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JEEPARDY!



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“*DAUBERT UNCOVERED*” FOR \$100

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Also known as the “gatekeeper,” this important party to every judicial proceeding is in charge of allowing or excluding expert testimony.

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Who is The Court?



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Although all are not necessary, an expert cannot provide testimony without being qualified in one of these four ways.

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What is knowledge, skill, experience,
training, or education?



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The Daubert test is flexible here, and does not constitute a definitive checklist or test, and are factors to be considered by the judge, leaving it uncertain as to the qualifications and knowledge that is expected of an expert in this state.

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What is Florida?



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Daubert only applies to “scientific” experts and evidence in this state, which otherwise allows experts to testify based upon technical or other specialized knowledge.

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What is Alabama?



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A proffered expert **MUST** meet what five criteria before the “gatekeeper” will allow their expert testimony.

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What is:

- 1. Must be qualified (knowledge, skill, experience, training, or education).
- 2. Must possess “scientific, technical, or other specialized knowledge.”
- 3. Must help the trier of fact to understand the evidence or determine a fact in issue.
- 4. Opinions must be the product of reliable principles and methods.
- 5. Must reliably apply the principle and methods to the facts of the case?

DAUBERT UNCOVERED

- *Daubert v. Merrell Dow Pharmaceuticals Inc.*, 509 U.S. 579 (1993)
- Rule 702 for most states
 - The *Daubert* standard is a rule of evidence regarding the admissibility of expert witness testimony
- Five factors for determining whether an expert's methodology is valid
 - Whether the theory or technique in question can be and has been tested
 - Whether it has been subjected to peer review and publication
 - Its known or potential error rate
 - The existence and maintenance of standards controlling its operation
 - Whether it has attracted widespread acceptance within a relevant scientific community
- The burden is on the proponent of the testimony to establish its admissibility.

DAUBERT UNCOVERED

- *Daubert* challenge
 - Seeks to exclude an expert's testimony on basis that it is not reliable or relevant
 - One of the strongest legal mechanisms opposing counsel can use to discredit the validity of an expert's testimony, and possibly have it excluded all together
 - Provides a practice run at presenting and challenging the evidence
- Bringing a *Daubert* challenge
 - Separate motion
 - Part of summary judgment
 - Motion in limine
 - Objection at the time testimony is given
 - Post-trial motion

DAUBERT UNCOVERED

- What can be challenged?
 - Qualifications
 - Methods
 - Science relied upon
- The best defense is a good offense
 - When choosing your expert keep in mind the potential for a *Daubert* challenge
- GOAL: establish the relevance and reliability of your expert's testimony



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Decided in 1923, this case forms the basis for expert admissibility standards in the six states that do not follow *Daubert*.

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What is *Frye*?

(Frye v. United States, 293 F. 1013 (D.C. Cir. 1923))



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While many of you may find it difficult to “accept,” this is the first prong of the *Frye* test.

“NO *DAUBERT* HERE” FOR \$200

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What is “general acceptance in the scientific community?”



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In addition to the four “*Frye*” states of Illinois, New York, Pennsylvania, and Washington, these two states follow hybrid models known as *Kelly-Frye* and *Frye-Mack*, respectively.

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What are California and Minnesota?



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Although this state has expressly rejected *Daubert*, the Chief Justice of its Supreme Court has authored a law review article in which she urges “leaving *Frye* in the past and looking to the future of the *Daubert* trilogy [*Daubert*, *Joiner*, and *Kumho Tire*].”

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What is Minnesota?



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Although “technically” *Daubert* states, Alabama, Connecticut, Louisiana, New Mexico, and West Virginia follow *Daubert* for this type of expert opinion evidence only.

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What is scientific or technical evidence?

“NO *DAUBERT* HERE” – WHAT YOU NEED TO KNOW...

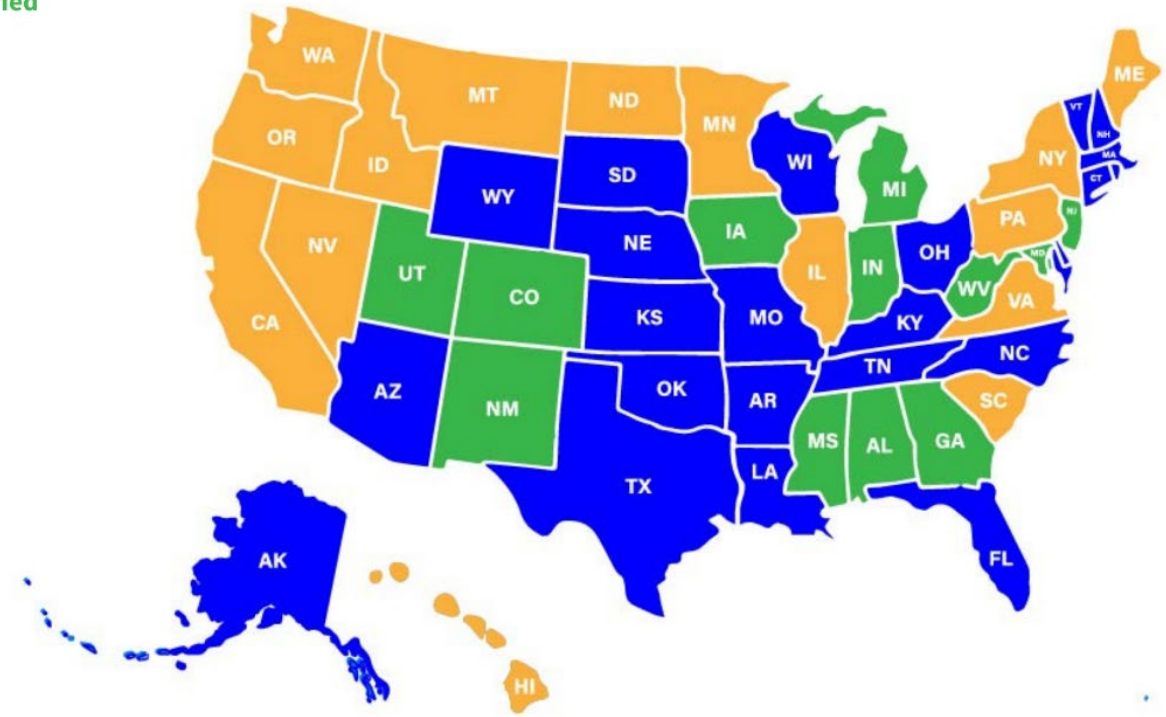
- Non-Daubert States are the minority in the U.S.
- 15 states
- Less than 1/3

Daubert Standard

Yes

No

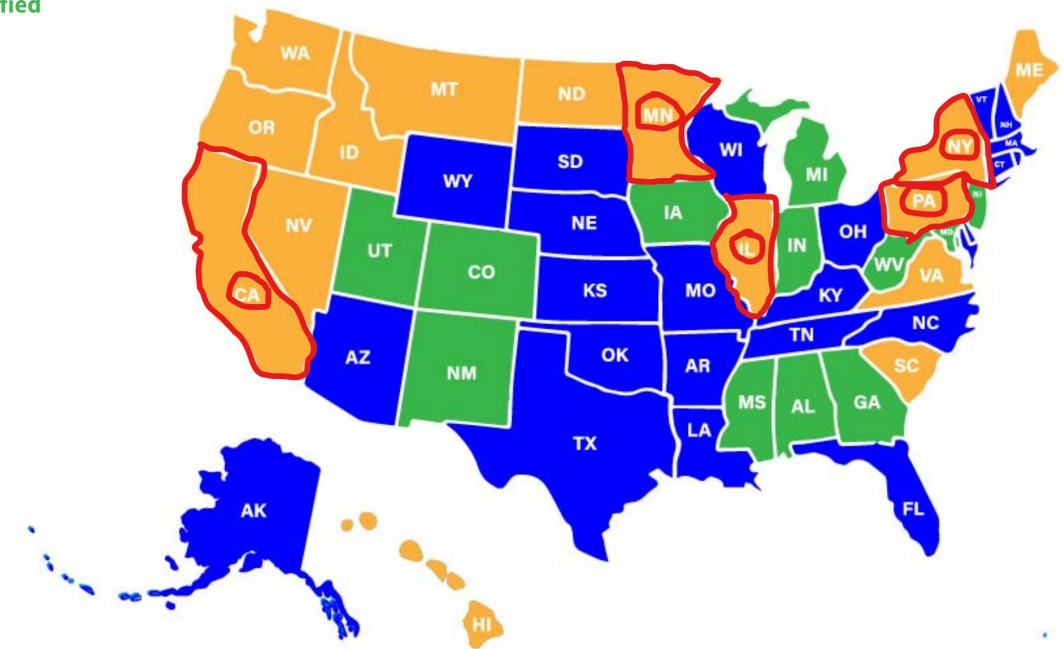
Modified



“NO *DAUBERT* HERE” – WHAT YOU NEED TO KNOW ...

- But some of them are significant
- Five of the ATR’s Top-10 “Judicial Hellholes”* are Non-Daubert States
 - Pennsylvania – Ct. of Common Pleas, Philadelphia
 - New York – NYC
 - California
 - Illinois – Cook, Madison, St. Clair Counties
 - Minnesota

Daubert Standard
Yes
No
Modified



*American Tort Reform Foundation, 2020-2021 Judicial Hellhole Report

“NO *DAUBERT* HERE” – WHAT YOU NEED TO KNOW ...

Frye v. United States, 293 F. 1013 (D.C. Cir. 1923)

“Just when a scientific principle or discovery crosses the line between the experimental and demonstrable stages is difficult to define. Somewhere in this twilight zone the evidential force of the principle must be recognized, and while courts will go a long way in admitting expert testimony deduced from a well-recognized scientific principle or discovery, the thing from which the deduction is made must be sufficiently established to have gained general acceptance in the particular field in which it belongs.”

“NO *DAUBERT* HERE” – WHAT YOU NEED TO KNOW ...

Pennsylvania

Pennsylvania has adopted the *Frye* standard. Pa.R.E. 702(c) applies the “general acceptance” test for the admissibility of scientific, technical, or other specialized knowledge testimony. *See Snizavich v. Rohm and Haas Co.*, 2013 Pa. Super. 315 (Pa. Super. 2010).

“NO *DAUBERT* HERE” – WHAT YOU NEED TO KNOW ...

New York

New York uses the *Frye* standard, which was reinforced in *People v. Wesley*, 633 N.E.2d 451 (N.Y. 1994). The *Frye* test asks “whether the accepted techniques, when properly performed, generate results accepted as reliable within the scientific community generally.” *Wesley*, 633 N.E.2d at 454.

“NO *DAUBERT* HERE” – WHAT YOU NEED TO KNOW ...

Illinois

Illinois follows the *Frye* standard. *Donaldson v. Central Illinois Public Service Co.*, 199 Ill.2d 63 (2002). This standard “dictates that scientific evidence is only admissible at trial if the methodology or scientific principle upon which the opinion is based is ‘sufficiently established to have gained general acceptance in the particular field in which it belongs.’” *Donaldson*, 199 Ill.2d at 77. This fact is further confirmed by Illinois Rules of Evidence 702.

“NO *DAUBERT* HERE” – WHAT YOU NEED TO KNOW ...

California

California follows the “general acceptance test,” otherwise referred to as the *Kelly-Frye* standard. *Frye v. United States*, 293 F. 1013 (D.C. Cir. 1923) and *People v. Kelly*, 17 Cal 3d 24 (1976). A court’s gatekeeper-ability is limited to ensuring the foundation of opinions are the type reasonably relied upon by experts in the field. See *Sargon Enterprises v. University of Southern California*, 55 Cal 4th 747, 772 (2012); see also *People v. Azcona* (2020), 58 Cal. App. 5th 504, 511.

“NO *DAUBERT* HERE” – WHAT YOU NEED TO KNOW ...

People v. Kelly, 17 Cal 3d 24 (1976)

“The primary advantage ... of the *Frye* test lies in its essentially conservative nature. For a variety of reasons, *Frye* was deliberately intended to interpose substantial obstacles to the unrestrained admission of evidence based upon new scientific principles.”

“NO *DAUBERT* HERE” – WHAT YOU NEED TO KNOW ...

Sargon Enterprises, Inc. v. University of Southern California, 55 Cal. 4th 747 (2012).

“...under Evidence Code sections 801, subdivision (b), and 802, the trial court acts as a gatekeeper to exclude expert opinion testimony that is (1) based on matter of a type on which an expert may not reasonably rely, (2) based on reasons unsupported by the material on which the expert relies, or (3) speculative. Other provisions of law, including decisional law, may also provide reasons for excluding expert opinion testimony.”

“NO *DAUBERT* HERE” – WHAT YOU NEED TO KNOW ...

Minnesota

Minnesota follows the *Frye-Mack* standard. *State v. Mack*, 292 N.W.2d 764 (Minn. 1980) (Held that the expert’s technique must be based on a foundation that is “scientifically reliable.”). To be admitted, testimony must (1) involve technique which has gained general acceptance in the scientific community, and (2) the testing must be done properly. Leading case is *Goeb v. Tharaldson*, 615 N.W.2d 800 (Minn. 2000)

“NO *DAUBERT* HERE” – WHAT YOU NEED TO KNOW ...

***State v. Mack*, 292 N.W.2d 764 (Minn. 1980)**

In addition to general acceptance in the scientific community, the expert testimony must “meet ordinary standards of reliability for admission.”

“NO *DAUBERT* HERE” – WHAT YOU NEED TO KNOW ...

Minn. Sup. Ct. Order – Nov. 16, 2018

We rejected the *Daubert* standard in *Goeb v. Tharaldson* 615 N.W.2d 800... We have continued to apply the *Frye-Mack* standard ... and have not suggested that we are ready to reject that standard or that Rule 702 in its current form makes the standard difficult to apply. Yet the public comments view the committee's proposed rule as an effective adoption of the *Daubert* standard... [W]e are reluctant to overrule our precedent by means of a rule amendment, particularly when the proposed amendment is controversial and unsupported by compelling evidence of a need for a change.

“NO *DAUBERT* HERE” – WHAT YOU NEED TO KNOW ...

Key Takeaways ...

- At least for the foreseeable future, *Frye* is here to stay.
- Under *Frye*, reliability is not determined by the Court, but rather by the relevant scientific or technical community.



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This state has adopted the *Daubert* test for evaluating proffered testimony, but only if the testimony deals with “scientific knowledge” – this standard has been coined the *Daubert/Wilt* test.

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What is West Virginia?



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This state’s Supreme Court has stated that factors similar to the factors used in *Daubert* to evaluate expert testimony “serve no useful analytical purpose when evaluating nonscientific expert testimony.”

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What is South Carolina?



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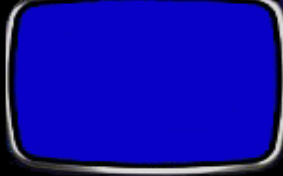
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This state’s Supreme Court made this statement: “For example, a technique that is grounded in traditional psychiatric or psychological principles, whether or not it is generally accepted, might be found to be admissible whereas we would be inclined to hold inadmissible a technique based upon astrology, even though it might be generally accepted by astrologists.

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What is New Mexico?



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This state applies the *Daubert* factors when “novel scientific evidence” is involved.

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What is Montana?



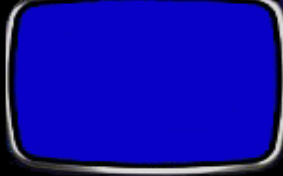
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This state uses the *Daubert* standard to evaluate experts in all cases except in professional malpractice cases.

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What is Georgia?

FINAL JEOPARDY (CLE POP-UP QUESTION)

- What federal court case expanded the Daubert test to all expert testimony, not just testimony based in science?
 - A. Swindled Inc. v. Howie Cheatum, 530 U.S. 322 (2003).
 - B. Kumho Tire Co. v. Carmichael, 526 U.S. 137 (1999).
 - C. The People v. Covid-19, 145 S. Ct. 19 (2022).
 - D. Batman v. Commissioner, 342 U.S. 877 (1951).

SCIENTIFIC VERSUS TECHNICAL OR OTHER SPECIALIZED KNOWLEDGE

Scientists Ugur Sahin and Ozlem Tureci



SCIENTIFIC VERSUS TECHNICAL OR OTHER SPECIALIZED KNOWLEDGE



FRE RULE 702. TESTIMONY BY EXPERT WITNESSES

- A witness who is qualified as an expert by knowledge, skill, experience, training, or education may testify in the form of an opinion or otherwise if:

(a) the expert's scientific, technical, or other specialized knowledge will help the trier of fact to understand the evidence or to determine a fact in issue;

(b) the testimony is based on sufficient facts or data;

(c) the testimony is the product of reliable principles and methods; and

(d) the expert has reliably applied the principles and methods to the facts of the case.

FRE RULE 702 NOTES OF ADVISORY COMMITTEE ON PROPOSED RULES

An opinion from an expert who is not a scientist should receive the same degree of scrutiny for reliability as an opinion from an expert who purports to be a scientist.

FRE RULE 702 NOTES OF ADVISORY COMMITTEE ON PROPOSED RULES

The trial judge in all cases of proffered expert testimony must find that it is properly grounded, well-reasoned, and not speculative before it can be admitted.

E.G. WEST VIRGINIA APPLIES DAUBERT TO “SCIENTIFIC KNOWLEDGE”



Daubert/Wilt applied to a medical expert, but not to a polygraph test, battered women’s syndrome, and land values.

E.G. ALABAMA APPLIES DAUBERT EXCEPT IN CERTAIN CASES



Section 12-21-160, Ala. Code (1975); Rule 702. Testimony by Experts

Daubert-type test applies to “scientific theory, principle, methodology, or procedure,” but specifically “shall not apply to domestic-relations cases, child-support cases, juvenile cases, or cases in the probate court.”

E.G. GEORGIA APPLIES DAUBERT EXCEPT IN MED MAL CASES

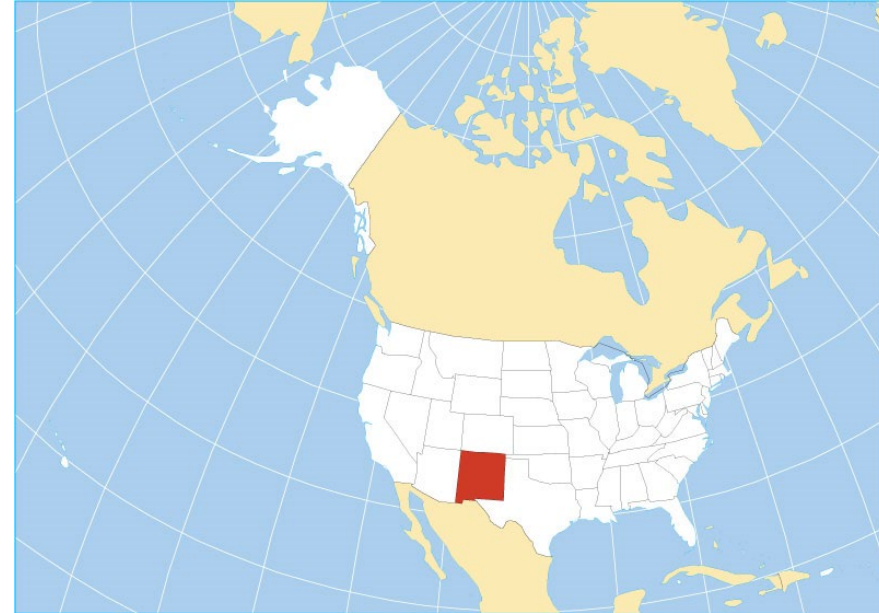


E.G. GEORGIA APPLIES DAUBERT, BUT MODIFIED DAUBERT IN PROFESSIONAL MALPRACTICE ACTIONS



Per a codified Rule 702 (O.C.G.A. § 24-7-702), in non-professional malpractice civil cases, Georgia is a *Daubert* jurisdiction. In professional malpractice cases, Georgia employs a modified *Daubert* standard.

E.G. NEW MEXICO APPLIES DAUBERT WHEN ANALYZING RELIABILITY OF SCIENTIFIC EXPERT TESTIMONY



11-702, NMRA Committee Commentary:
“New Mexico has not adopted the changes made to the federal rule in 2000 to incorporate the requirements of *Daubert* in light of the differences between federal law and New Mexico law regarding whether *Daubert* applies to nonscientific testimony.”

SCIENCE V. TECHNICAL OR OTHER SPECIALIZED KNOWLEDGE



THANK YOU FUTURE LEADERS FORUM



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