

IN THE SUPERIOR COURT OF GWINNETT COUNTY
STATE OF GEORGIA

BEVERLY MORRIS and PHILLIP J.
MORRIS, a married couple,
LINDSAY WILSON, and
CHRISTOPHER WILSON, a married couple,
JONATHAN ZIEGLER, and HOLLY M.
ZIEGLER, a married couple; and ADAM
CLACK, and ALEXIS SPAIN, a married
couple,

Plaintiffs,

v.

META PLATFORMS, INC.,
MORNING HORNET LLC,
BAYMARE LLC,
JOINT DEVELOPMENT AUTHORITY OF
JASPER COUNTY, MORGAN COUNTY,
NEWTON COUNTY, AND WALTON
COUNTY, GEORGIA,
HOLDER CONSTRUCTION COMPANY,
and PLATEAU EXCAVATION, INC.,

Defendants.

Civil Action File No. 26-A-07974-11

DEMAND FOR JURY TRIAL

**COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF, ATTORNEYS' FEES,
COSTS, AND EXPENSES OF LITIGATION**

Plaintiffs Beverly Morris and Phillip J. Morris ("Morris Plaintiffs"), Plaintiffs Lindsay Wilson and Christopher Wilson ("Wilson Plaintiffs"), Jonathan Ziegler and Holly M. Ziegler, ("Ziegler Plaintiffs"), and Adam Clack and Alexis Spain ("Clack Plaintiffs," collectively, "Plaintiffs") hereby file this Complaint seeking damages against Defendants Meta Platforms, Inc.; Morning Hornet LLC; Baymare LLC; Joint Development Authority of Jasper County, Morgan County, Newton County, and Walton County; Holder Construction Company; and Plateau Excavation, Inc. ("Defendants") for their wrongful acts that have caused Plaintiffs' past

and ongoing damage to their real property and, if left unabated and unremedied, will continue to cause them property damage and other harms, showing the Court as follows:

INTRODUCTION

1. This action for damages arises out of the site selection, planning, development, land disturbing, construction, ownership, and operation of the Meta Stanton Springs Data Center (formerly known as the Facebook Newton Data Center), a portion of which bears the street address 100 Move Fast Way, Social Circle, Georgia 30025, which has caused, and continues to cause, property damage to Plaintiffs and has subjected, and continues to subject, Plaintiffs to unreasonable living conditions.

2. Defendants Meta Platforms, Inc., Morning Hornet LLC, and Baymare LLC (together, “Meta Defendants”); Defendant Joint Development Authority of Jasper County, Morgan County, Newton County, and Walton County, as landowner (hereinafter, the “Development Authority” or “JDA”); and Defendants Holder Construction Company, and Plateau Excavation, Inc. (“Construction Defendants”) coordinated and engaged in various land disturbing, development and construction-related operations in various phases, including site selection, planning, development, road and site expansion, land clearing, grading, excavation, engineering design, and seismic activities such as blasting, ripping (use of heavy equipment to penetrate and fracture, disturb and remove hard soil, compacted subsurface and/or bedrock), and other development activities that have caused and continue to cause substantial harm to Plaintiffs, including the release and incursion of sediment through groundwater and sediment-laden stormwater discharges to enter onto Plaintiffs’ property.

3. As a result of Defendants’ tortious and unreasonable conduct, Plaintiffs have sustained damages from sediment-laden stormwater discharges, silt and sedimentation in their

wells, and sediment intrusion, premature failure of home appliances, excessive wear on home appliances, loss of reasonable use of water fixtures and plumbing, together with other harms and losses. The Morris Plaintiffs and Wilson Plaintiffs have furthermore sustained substantial reduction of water pressure and restricted water supply lines, disruption of electrical power, unreasonable noise, and light pollution from Defendants' activities detailed herein.

4. On December 16, 2025, Morris Plaintiffs and Wilson Plaintiffs tendered to the Meta Defendants a *Demand to Abate Continuing Nuisance and Trespass to Property* via certified mail, a true and correct copy of which is attached as **Exhibit "A."** The allegations in this letter are incorporated herein by reference (hereinafter, the "December 2025 Demand to Meta").¹ In their December 2025 Demand to Meta, these Plaintiffs expressed "their sincere hope that Meta will decide to engage in a good faith, in-person discussion to arrive at a prompt, permanent resolution that will end the harms imposed on them by the Stanton Springs Data Center, in the hopes of avoiding unnecessary litigation" *id.*, p. 2, and sought a response by January 16, 2026 "to schedule a meeting to discuss the means of ceasing these conditions and resolving these harms..." *id.*, p. 22. Meta Defendants did not respond to Plaintiffs' request. Even after January 16, 2026, Meta Defendants have never responded to the December 2025 Demand to Meta.

5. On January 23, 2026, Morris Plaintiffs and Wilson Plaintiffs tendered to Holder Construction Company and Plateau Excavation, Inc. a *Demand to Abate Continuing Nuisance and Trespass* via certified mail, a true and correct copy of which is attached as **Exhibit "B."** The allegations in this letter and attachments thereto are incorporated herein by reference (hereinafter, the "January 2026 Demand to Holder and Plateau Excavation").

¹ The reference to Interstate "75" on page 19 in the December 2025 Demand to Meta is corrected to refer to "Interstate 20" in **Exhibit B**, and **Exhibit C**.

6. Holder Construction Company has not responded to the January 2026 Demand to Holder and Plateau Excavation.

7. On January 23, 2026, Morris Plaintiffs and Wilson Plaintiffs tendered to the Development Authority a *Demand to Abate Continuing Nuisance and Trespass and Claim for Damages* via certified mail, a true and correct copy of which is attached as **Exhibit “C.”** The allegations in this letter and attachments thereto are incorporated herein by reference (hereinafter, the “2026 Demand to the Development Authority”).

8. The Development Authority responded to the 2026 Demand to the Development Authority on March 27, 2026. Therein, Development Authority, through its legal counsel, denied liability for any alleged damages to these Plaintiffs and further denied liability as to these Plaintiffs’ claims for nuisance or trespass.

9. The damage caused by Defendants’ tortious and unreasonable actions and inactions to Plaintiffs’ property was foreseeable to Defendants.

10. The damage caused by Defendants’ tortious and unreasonable actions and inactions to Plaintiffs’ properties was actually foreseen by Defendants, both prior to and following the tender of: (A) the December 2025 Demand to Meta; (B) the January 2026 Demand to Holder and Plateau Excavation; and (C) the January 2026 Demand to the Development Authority, concerning both the Morris Plaintiffs and Wilson Plaintiffs, as well as the remaining Plaintiffs, who are similarly situated as the Morris Plaintiffs and Wilson Plaintiffs.

11. What is foreseeable can be avoided; refusing to avoid the foreseeable makes the conduct intentional.

12. Plaintiffs bring this action seeking injunctive relief to prevent the continuing harm to their properties and to recover damages for the harm already sustained.

PARTIES

13. Plaintiffs Beverly Morris and Phillip J. (Jeff) Morris own and occupy certain real property in Mansfield, Morgan County, Georgia (“Morris Property”).

14. Plaintiffs Lindsay Wilson and Christopher Wilson own and occupy certain real property in Mansfield, Morgan County, Georgia (“Wilson Property”).

15. Plaintiffs Jonathan Ziegler and Holly Ziegler own and occupy certain real property in Mansfield, Morgan County, Georgia (“Ziegler Property”).

16. Plaintiffs Adam Clack and Alexis Spain own and/or occupy certain real property in Mansfield, Morgan County, Georgia (“Clack Property”).

17. Defendant Meta Platforms, Inc. (“Meta”) is a corporation formed under the laws of the State of Delaware, whose principal office is located in Menlo Park, CA. Meta may be served through its registered agent, Corporate Services Company, 2 Sun Court, Suite 400, Peachtree Corners, GA 30092. Meta is formerly known as Facebook, Inc.

18. Defendant Morning Hornet LLC (“Morning Hornet”) is a limited liability company formed under the laws of the State of Delaware, whose principal office is located in Menlo Park, CA. Morning Hornet may be served through its registered agent, Corporate Services Company, 2 Sun Court, Suite 400, Peachtree Corners, GA 30092. Morning Hornet is a subsidiary of Meta.

19. Defendant Baymare LLC (“Baymare”) is a limited liability company formed under the laws of the State of Delaware, whose principal office is located in Wilmington, DE. Baymare may be served through its registered agent, Corporate Services Company, 2 Sun Court, Suite 400, Peachtree Corners, GA 30092. Baymare is a subsidiary of Meta.

20. Defendant Joint Development Authority of Jasper County, Morgan County, Newton County, and Walton County (“Development Authority”) is a joint development authority formed pursuant to O.C.G.A. § 36-62-5.1, by joint and concurrent resolutions of the Board of Commissioners for Jasper County, Morgan County, Newton County, and Walton County. O.C.G.A. § 36-62-6(a) grants the Development Authority the power to bring and defend actions, waiving sovereign immunity. The Development Authority may be served through its attorney, Andrea P. Gray, Esq., at 300 E Church Street, Monroe, GA, 30655.

21. Defendant Holder Construction Company (“Holder”) is a corporation formed under the laws of the State of Georgia, whose principal office is located in Atlanta, Georgia. Holder may be served through its registered agent, Shawn Belin, at 3300 Riverwood Pkwy, Suite 1200, Atlanta, GA, 30339.

22. Defendant Plateau Excavation, Inc. (“Plateau Excavation”) is a corporation formed under the laws of the State of Georgia, whose principal office is located in Kennesaw, Georgia. Plateau may be served through its registered agent, Corporate Services Company, 2 Sun Court, Suite 400, Peachtree Corners, GA 30092.

JURISDICTION AND VENUE

23. This Court has subject matter jurisdiction over this action and has personal jurisdiction over Defendants.

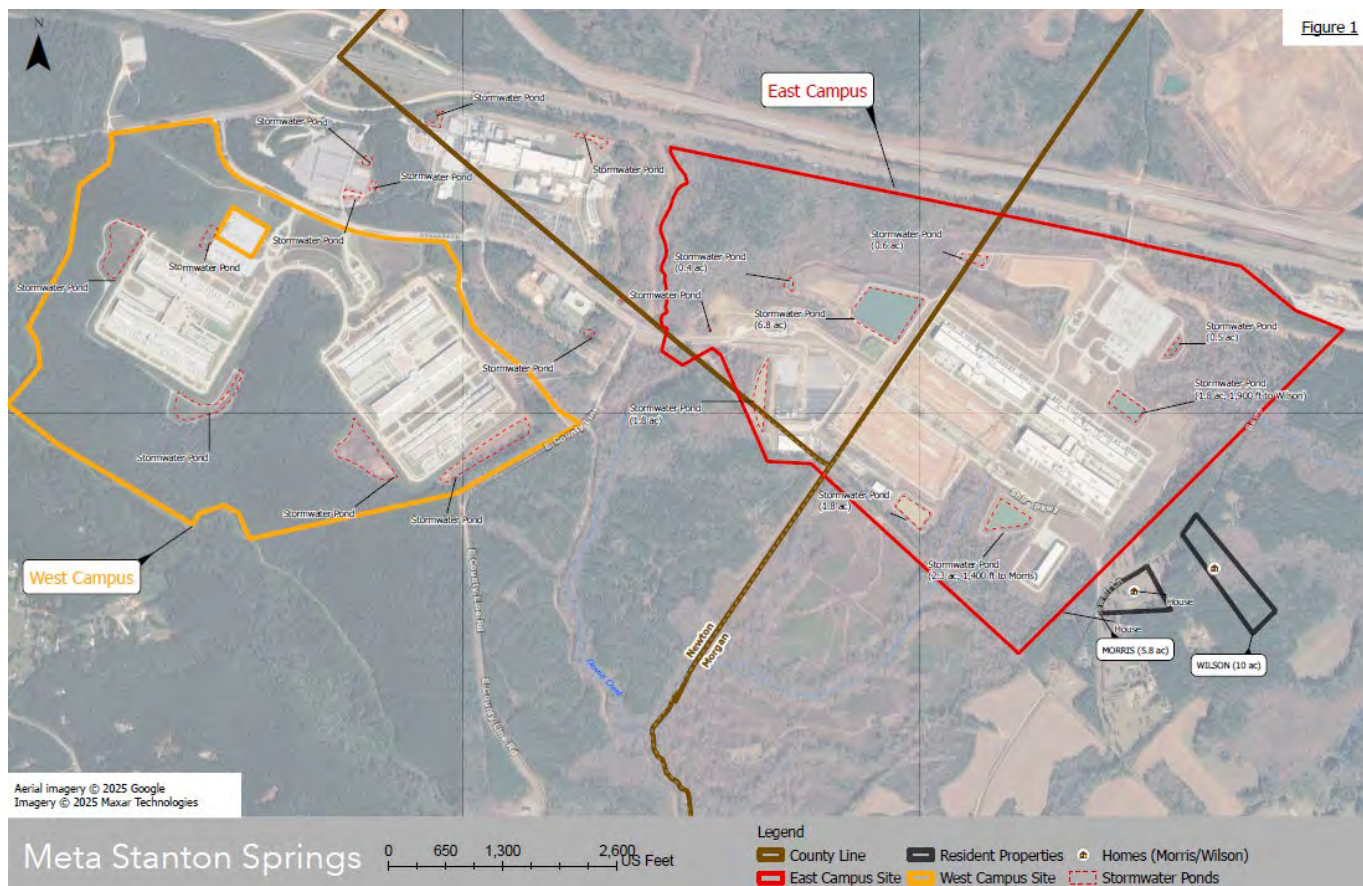
24. Venue is proper in this Court.

THE FACTS

A. *The Meta Stanton Springs Data Center Complex*

25. For all relevant periods of time detailed in this Complaint, the Meta Stanton Springs Data Center is owned, operated, and controlled by Meta Defendants. The Meta Stanton

Springs Data Center consists of a colossal complex of buildings and supporting infrastructure spread across two campuses collectively occupying portions of three Georgia counties – Walton, Newton, and Morgan (Figure 1):



26. The Meta Stanton Springs Data Center is comprised of the West Campus and the even larger East Campus. The “West Campus” occupies about 416 acres (See Figure 1).

27. The “East Campus” occupies more than 566 acres bordered on its east by Sewell Lane. Morris and Wilson Plaintiffs’ properties are located on the other side of Sewell Lane (See Figure 1).

28. The properties of the Clack Plaintiffs and Ziegler Plaintiffs are similarly situated, and/or share the same aquifer system as the Morris and Wilson Plaintiffs, all of whose homes and

onsite wells are now continuously impacted by silt and sediment contamination by the acts and omissions of Defendants.

29. The real property on which the Meta Stanton Springs Data Center sits, including the East Campus and West Campus, is owned and controlled by the Development Authority.

30. The West Campus was developed prior to the East Campus. Prior to development of the East Campus, a street known as Shire Parkway was extended eastward to provide road access to the future East Campus site by use of earthmoving equipment, grading, filling of wetlands, removal of trees, and other construction and land-disturbing activities. This road extension project began in 2018 and is commonly referred to as the Shire Parkway Extension.

31. Once the West Campus was completed or nearly completed, the Development Authority proposed the Shire Parkway Extension project to provide road access further eastward toward the East Campus.

32. Development Authority commissioned the preparation of “Contract Documents and Technical Specifications” for the Shire Parkway Extension, incorporating a Soil Survey Report dated June 17, 2018. The Soil Survey Report estimated the location of possible boulder or rock removal by use of heavy equipment and/or light blasting at a location specified as between Station 13+00 to 15+00 Right and Left, placing the location of anticipated heavy equipment removal or light blasting directly along the Shire Parkway Extension road corridor extending toward and into what is now the East Campus at Stanton Springs. The Soil Survey Report gave Meta Defendants and Development Authority advance notice of rocky conditions requiring possible explosives blasting within what is now the East Campus footprint.

33. In a letter dated June 20, 2025, Meta Defendants confirmed “Seismic Impacts:” consisting of “Limited blasting between the East Campus and West Campus occurred on 29

March 2024 to remove soil and rock in an isolated area located approximately 1.1 miles away from the homeowner's property" corresponding to the location contemplated in the Contract Documents and Technical Specifications for the Shire Parkway Extension project.

B. Plaintiffs' Properties

34. Morris Plaintiffs own the Morris Property in Morgan County, Georgia, where they have resided since April 2016 as their only residence.

35. Wilson Plaintiffs own the Wilson Property in Morgan County, Georgia, where they have resided since September 2020 as their only residence.

36. Ziegler Plaintiffs own the Ziegler Property in Morgan County, Georgia, where they have resided since August 2021 as their only residence.

37. Clack Plaintiffs own and/or reside at the Clack Property, where they have resided since approximately October 2017 as their only residence.

38. Plaintiffs and their families rely exclusively on privately sourced domestic well water on their properties for their basic living activities, such as drinking, food preparation, washing dishes, showering, cleaning, operation of their toilets, irrigation, and maintaining and sustaining family pets, including horses, chickens, and dogs.

39. The basic features of Plaintiffs' homes, including a supply of clean, safe drinking water, stable, consistent water pressure, reliable electricity, peace and quiet free from unreasonable noise and vibrations, free from unreasonable light intrusion in the evenings, and reliable home appliances and interior plumbing and fixtures, are of the utmost importance to Plaintiffs. Such uses, qualities, and features are an inherent part of the value of Plaintiffs' homes and properties and their use and enjoyment of the same.

40. Prior to Defendants' tortious and unreasonable conduct, Plaintiffs relied on stable, trouble-free well water and home fixtures, plumbing and appliances. Their well water was clear with consistent water pressure in their homes, exhibiting no unreasonable or out of the ordinary issues involving sediment infiltration, buildup, turbidity, cloudiness, or visible contamination.

41. Prior to the purchase of their respective homes, the Morris Plaintiffs (2016), Clack Plaintiffs (2017), and Wilson Plaintiffs (2020) each engaged certified home inspectors as part of their purchase due diligence, none of which documented plumbing, fixture, well or drinking-water problems, or issues with sediment or siltation.

42. The Ziegler Plaintiffs' well was installed in the spring of 2021, and the Ziegler Plaintiffs engaged a certified home inspector as part of their purchase due diligence, with no onsite well conditions reported concerning sediment or siltation. Less than a year following purchasing their home in 2021, their water heater failed in 2022, requiring replacement due to sediment intrusion. The sediment intrusion is continuing as the Zieglers' well continues to intercept silt and sediment from the aquifer.

43. Plaintiffs' well water quality is now substantially impaired and contaminated following and as a direct result of Defendants' acts and omissions, including the selection of the Meta Stanton Springs Data Center site and eastward expansion thereof, and the improperly conceived, planned, designed and implemented mass deforestation, land disturbing, explosives blasting, development, construction, and operation of the data center on the East Campus and related facilities.

C. *Meta and the Development Authority's rapid completion of the East Campus and Shire Parkway Extension*

44. Both Meta Defendants and the Development Authority have a revenue interest in the Meta Stanton Springs Data Center project's rapid completion.

45. The Meta Stanton Springs Data Center was developed by Morning Hornet and Baymare and is operated by Meta. Consequently, Meta Defendants own and exercise control over the cause of the continuing nuisance, trespass and harms detailed in this Complaint.

46. The Meta Stanton Springs Data Center is Meta's twelfth data center in the world, and its ninth data center in the United States.

47. Without the active participation of the Development Authority, Meta Defendants would not have been otherwise drawn to the region to develop the Meta Stanton Springs Data Center. According to Meta's data centers website, the Stanton Springs site was selected in part because "we found a great set of community partners that have helped us move this project forward quickly."²

48. The self-stated goal of the Development Authority is to "create an industrial area to attract industry to the region."³

49. Furthering that self-stated goal, in or around February 2018, the Development Authority approved and issued taxable revenue bonds in the amount of \$42 billion (\$42,000,000,000) to Morning Hornet to pay or reimburse the costs of acquiring, constructing, equipping, and installing a "project," and to further lease to Morning Hornet land, together with improvements thereto and equipment thereon, for use as a data center.

50. In or around February 2021, the Development Authority approved and issued a second round of taxable revenue bonds in the amount of \$42 billion (\$42,000,000,000) to Baymare for the same or similar purpose as the Morning Hornet bonds.

² <https://datacenters.atmeta.com/2021/03/hello-georgia/>

³ <https://www.i20jda.com/about.html>

51. On or about December 1, 2021, Baymare assigned its interest in the second data center project to Morning Hornet. This rendered Morning Hornet the “owner of both data center projects.”⁴

52. In exchange for the generous tax incentive of developing the Meta Stanton Springs Data Center, Meta Defendants agreed to make payments in lieu of taxes, or PILOTs, to the Development Authority.

53. Shane Short, President/CEO of the Development Authority of Walton County, admitted the Meta Stanton Springs Data Center “project” would allow the Development Authority to “pay off existing debt that’s been carried for almost 20 years.”⁵

54. The revenue derived from these PILOT payments by Meta Defendants would grant Newton and Walton Counties 37.5% of the revenue each, with Morgan County and Jasper County receiving 15% and 10% of the revenue, respectively.⁶

55. The PILOT payments due to the Counties are substantial. Under the PILOT payments structure, Meta Defendants would begin making annual PILOT payments at \$2,000,000 for the first two years, increasing the amount by \$1,000,000 every two years up to \$5,000,000 per year.

56. Mr. Short further asserted that PILOTs from Meta Defendants are due even if all phases of the development are not constructed.⁷

⁴ <https://www.covnews.com/news/business/morning-hornet-takes-ownership-second-42b-data-center-project/>

⁵ <https://www.covnews.com/news/county/county-waives-taxes-morning-hornet/>

⁶ <https://www.covnews.com/news/business/documents-reveal-42-billion-bond-another-data-center-stanton-springs/>

⁷ <https://www.covnews.com/news/county/county-waives-taxes-morning-hornet/>

57. Pursuant to the taxable revenue bonds the Development Authority issued, Meta Defendants, through Holder and Plateau Excavation, began their engineering design, mass grading, land clearing, construction and other land disturbing activities near Plaintiffs' properties to develop the Shire Parkway Extension and Meta Stanton Springs Data Center East Campus site in approximately 2018. Work to complete the build out of all buildings housing the data center physical plant on the East Campus is ongoing.

58. Although the Development Authority succeeded in its goal to bring a massive technology giant to this small community of rural Georgia, it has been at the expense of Plaintiffs, whose property interests have been substantially harmed and their property values diminished.

59. The Development Authority has created a scheme wherein its financial interests are tied to siting, concentration, and development of the Stanton Springs Data Center at a pace intended to move forward quickly, foreseeably harming Plaintiffs' properties.

60. On information and belief, Defendants improperly engaged in, controlled or directed explosives blasting, mass deforestation with improper soil mitigation, perimeter containment, sediment controls, or other "best management practices" (BMPs) at the West Campus, Shire Parkway Extension, and East Campus site with the full knowledge and full authority of the Development Authority, who owns the property on which the West Campus and East Campus are operating, with site development ongoing at the East Campus.

D. Planning, Development, and Construction of Meta Stanton Springs Data Center

61. On information and belief, Holder served as the general contractor for the overall planning, development, construction, and related operation of the Meta Stanton Springs Data Center, formerly the Facebook Newton Data Center, whose work is ongoing at the East Campus.

62. On information and belief, Holder has been involved with the planning, development, and construction of the Meta Stanton Springs Data Center since at least 2018, and likely prior to then.

63. On information and belief, Holder coordinated and supervised, and hence exercised control over, the work performed by other subcontractors, including how the grading, blasting, excavation, stormwater, buildout and infrastructure operations were performed, and is currently being maintained and operated.

64. Plateau Excavation is or was a subcontractor on the development and construction of both the West Campus and East Campus of the Meta Stanton Springs Data Center, and, on information and belief, executed the physical land-disturbing work, including mass-clearing of site vegetation, grading, explosives blasting, and subsurface excavation work, including vacuum excavation (“hydrovac” or “vac-ex”) and trenching, to develop the multi-structure industrial park where the West Campus and East Campus now sits.

65. Construction Defendants each made meaningful contributions to the planning, design, development, construction and ongoing operation of the Meta Stanton Springs Data Center, and are a correspondingly meaningful, direct cause of the harms to Plaintiffs and their properties as set forth herein.

E. Continuous Nuisance and Trespass of Silt and Sedimentation on Plaintiffs’ Properties

66. Upon information and belief, prior to the commencement of the East Campus development project, Construction Defendants engaged in detailed planning and coordination with the Development Authority, selecting the East Campus site for deforestation, mass grading, clearing, ripping, and other land disturbing activities, although they knew or should have known that its footprint occupied land designated as a Most Significant Ground-Water Recharge Area,

as designated by the Georgia Geologic Survey, Environmental Protection Division for the Department of Natural Resources, an area where the aquifer is particularly sensitive to pollution of ground water from the surface and near surface development activities.

67. On information and belief, Construction Defendants, in close coordination with the Development Authority, commenced significant site development work at the West Campus beginning approximately 2017, participating in, cooperating in, directing, approving, ratifying, and engaging in various land disturbing activities and construction or oversight at the West Campus site, without properly designing, installing, and/or maintaining stormwater controls, erosion and sedimentation control measures, and BMPs to otherwise prevent offsite discharges, migration and contamination of Plaintiffs' properties and residential drinking water wells by silt, sediment, fines and other pollutants.

68. On information and belief, Plateau Excavation engaged in significant land disturbing activity at the West Campus site, which it has referred to as the "Facebook Data Center Campus #1 (2017-2020)," with work consisting of moving upwards of 1,800,000 cubic yards of material, blasting 155,000 cubic yards of rock, crushing 175,000 tons of stone, onsite, and managing installation of 34,000 linear foot of storm drainage and 32,000 linear feet of wet utilities, along with subsurface excavation for electrical and telecommunication duct banks, and other work.

69. Construction Defendants, in close coordination with Development Authority, commenced significant site development work at the East Campus beginning at least as of 2020, participating in, cooperating in, directing, approving, ratifying, and engaging in various land disturbing activities and construction or oversight at the East Campus site, without properly designing, installing, and/or maintaining stormwater controls, erosion and sedimentation control

measures, and BMPs to otherwise prevent offsite discharges, migration and contamination of Plaintiffs' properties and residential drinking water wells by silt, sediment, fines and other pollutants.

70. On information and belief, Plateau Excavation engaged in significant land disturbing activity at and near the East Campus site, which it has referred to as the "Facebook Data Center Campus #2 (2021-Present)," with work consisting of moving upwards of 2,600,000 cubic yards of material, managing installation of 32,000 linear feet of storm drainage and 70,000 linear feet of wet utilities, along with 34,000 linear feet of subsurface excavation for electrical and telecommunication duct banks.

71. These land disturbance activities included rapid deforestation and clearing, grubbing, grading, explosive blasting, soil and rock excavation, hydro-excavation trenching, subsurface drilling and excavation, operation of heavy equipment and engaging in other large-scale construction activities to erect an industrial complex of multi-story structures and attendant power and water supply/stormwater and cooling water, and electrical and telecommunications infrastructure to support the immense hyperscale data center that is now in operation at the East Campus. Construction and development activities at the East Campus are continuing.

72. Construction Defendants, at the direction and for the benefit of Meta Defendants and the Development Authority, acted in concert with one another to engage in rapid deforestation and grading on a massive scale that stripped vegetation from hundreds of acres where an undeveloped forest once existed in close proximity to Plaintiffs' properties. Meta Defendants exercised control over and directed Construction Defendants, who in turn implemented and exercised control over the means and methods of this land-disturbing activity at the Stanton Springs Data Center site.

73. These land-disturbing activities exposed vast swathes of erodible soil. Defendants' land disturbing, construction and ongoing operation at the Stanton Springs Data Center site has materially altered the surface, subsurface features and characteristics of the soil and underlying geology that supplies the Plaintiffs' onsite wells.

74. These significant land disturbing activities, coupled with inadequate planning, improper site selection, and improper and inadequate BMPs, beginning approximately 2020 at and near the East Campus site are the direct and proximate cause of ongoing well contamination by silt, sediment, and polluted water and interior pipes, fixtures and appliances on Plaintiffs' properties.

75. The land disturbing and construction activity involved years-long, nearly daily operation of heavy equipment at various stages and in various proximity to Plaintiffs' homes and properties. Work performed by Plateau Excavation, with the supervision of Holder, included vacuum excavation ("hydrovac" or "vac-ex") and trenching, extending from the East Campus perimeter towards the Morris Property.

76. To install fiber optic cables from the East Campus of the Stanton Springs Data Center to the cloud, Meta Defendants, through Construction Defendants, engaged in vacuum excavation along a corridor from the East Campus toward Sewell Lane in 2023, including portions of land across the intersection of Sewell Lane and the Morris Property.

77. This vacuum excavation has created additional pathways for sediment to mobilize downslope in the direction of the Morris Property, releasing silt and sediment to groundwater, as well as onto the Morris Property through stormwater during rain events:



78. These pollutant discharges from Meta Defendants', Holder's and Plateau Excavation's land disturbing, construction and development activities emerged only after this work took place, and these discharges are continuing:

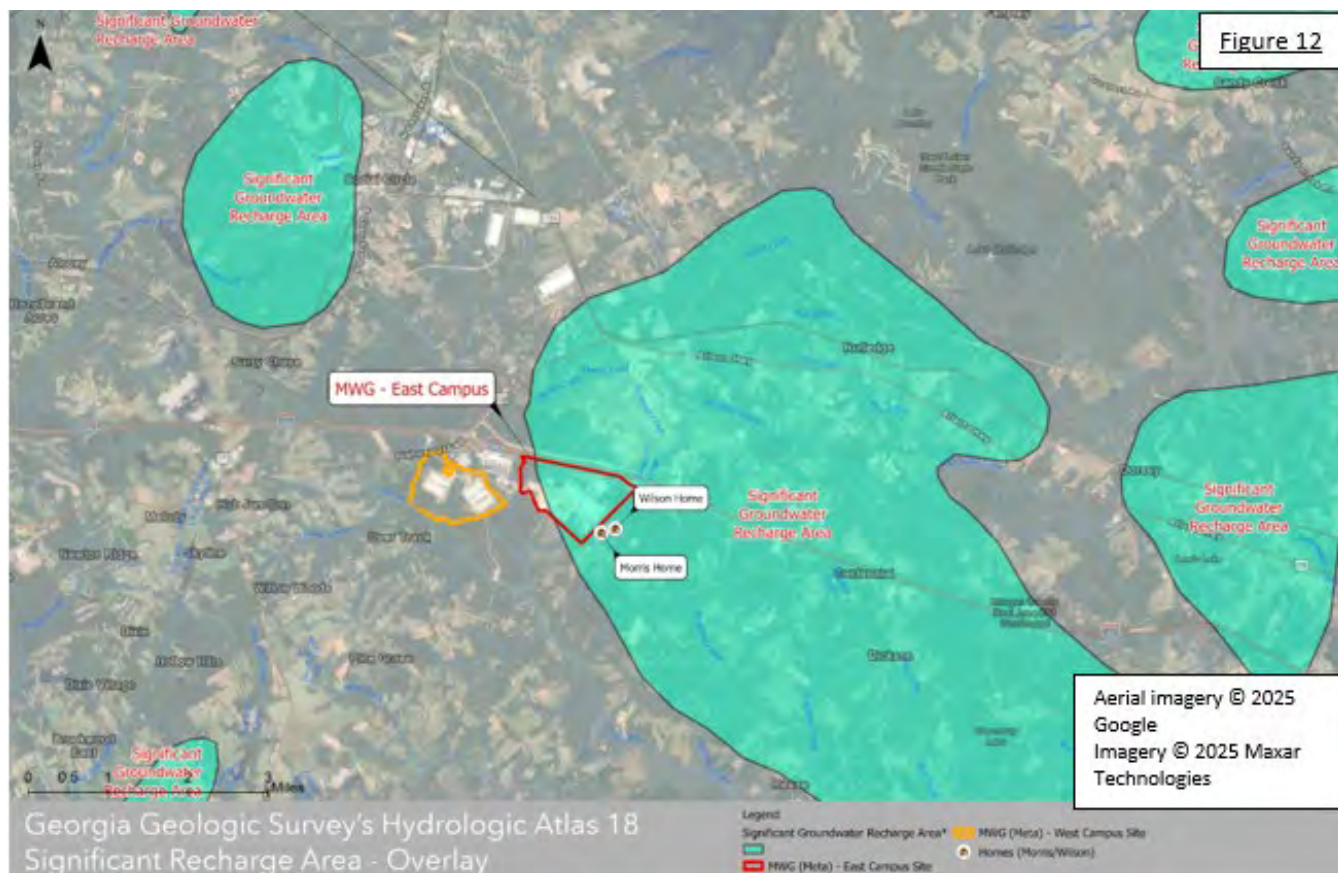


79. Plateau Excavation, in coordination with Holder, engaged in substantial land-disturbing activities at the Meta Stanton Springs Data Center site, with initial ground breaking occurring in 2018.

80. Much of the East Campus site is underlain by fractured crystalline bedrock typical of the Georgia Piedmont. This geology is highly susceptible to the transmission of fines, sediments, and contaminants through fracture networks that are directly connected to the regional groundwater aquifer existing beneath the East Campus and the Plaintiffs' properties.

81. Plaintiffs' properties are generally located east of Sewell Lane from the East Campus, and Plaintiffs' drinking water wells draw from the same aquifer system that underlies and is hydrologically connected to the East Campus site.

82. The majority of the East Campus and all of Plaintiffs' properties sit within a Georgia Geologic Survey designated "Most Significant Ground-Water Recharge Area"⁸:



83. Meta Defendants, Construction Defendants, and the Development Authority knew or should have known that residential homes are situated across Sewell Lane from the East

⁸ See <https://epd.georgia.gov/outreach/publications/georgia-geologic-survey-atlases> (HA-18 Most Significant Ground-Water Recharge Areas of Georgia (1989)).

Campus site, and situated in proximity to the Stanton Springs Data Center site relying on self-supplied groundwater wells.

84. At all times relevant, Meta Defendants, in coordination with the Development Authority, desired to develop the Meta Stanton Springs Data Center and associated areas as a hyperscale data center and supporting utility infrastructure requiring, among other things, extensive land clearing, excavation, trenching, grading, soil removal, seismic activity such as blasting and ripping, and other land disturbing activities. To accomplish this, Meta Defendants engaged Holder as the general contractor for the project phases.

85. Holder, in turn, engaged Plateau Excavation to perform explosives blasting and ripping operations at the Stanton Springs Data Center site and associated areas, which blasting occurred at least as of March 29, 2024 between the East Campus and West Campus and at the West Campus development footprint itself. Construction Defendants engaged in these operations for the purpose of fracturing and removing underlying bedrock and soil to facilitate construction and development of the data center complex and/or supporting infrastructure and related improvements, and to complete the Shire Parkway Extension.

86. The Development Authority, as the property owner of the land at the time blasting operations were performed, authorized, permitted, and facilitated the development activities, including blasting operations, on its property, including at the West Campus, the East Campus and the Shire Parkway Extension.

87. These land disturbing and seismic operations would not have occurred unless Meta Defendants had desired, facilitated, and engaged Construction Defendants to conduct such operations at the Meta Stanton Springs Data Center site.

88. These development operations would not have occurred unless the Development Authority had not desired, facilitated, and engaged Construction Defendants to conduct such development, land disturbing and blasting operations at Development Authority's property.

89. These land disturbing, development and construction operations would not have occurred unless Holder had not desired, facilitated, engaged, supervised, and ratified Plateau Excavation's physical site development and construction operations.

90. Seismic activity including blasting and other site development and land disturbing activity performed by Plateau Excavation at the West Campus site involved the removal of 155,000 cubic yards of rock and dirt – or roughly 4.2 million cubic feet. This activity can foreseeably open fractures in underlying bedrock, increase hydraulic conductivity, and mobilize sediment over considerable distances, with effects continuing to this day relative to Plaintiffs' properties.

91. On information and belief, the explosives blasting was conducted by Plateau Excavation with supervision by Holder, and each held full knowledge that such blasting occurred in close proximity to a Most Significant Ground-Water Recharge Area, on which most of the East Campus site is located.

92. Blasting and land-disturbing activity occurring at the West Campus footprint is located in proximity to a Most Significant Ground-Water Recharge Area, and this information was likewise known to Construction Defendants .

93. The Georgia Geologic Survey defines a Most Significant Ground-Water Recharge Area as "those regions likely to have the *greatest vulnerability to pollution of ground water* from

the surface and near surface activities of man.”⁹ It was foreseeable to Construction Defendants , the Development Authority, and Meta Defendants that land-clearing, grading, blasting, ripping, and excavation operations conducted near such an Area on which the East Campus sits would cause conditions of pollution of groundwater from mobilized sediment and fines from these surface and near surface activities.

94. On information and belief, this blasting and excavation activity occurred at least as of March 29, 2024 approximately 1.1 miles from the Morris Property along the Shire Parkway Extension corridor. The location of this blasting and rock and dirt excavation and land disturbing activities occurred in an unreasonable proximity to Plaintiffs’ homes and onsite wells, and in unreasonable proximity from the western edge of the Most Significant Groundwater-Water Recharge Area on which the East Campus sits. This seismic activity took place on property owned by and controlled by Development Authority, and Development Authority facilitated, commissioned, and ratified such activity on its property.

95. In this particular region of Georgia, water within the shallow aquifer system is replenished primarily through thick, permeable soils that allow rainfall to infiltrate vertically (or top down) into the fractured-rock groundwater system supplying clean, safe drinking water to homes relying on wells, like Plaintiffs. These soils are the aquifer’s protective and functional interface: they regulate infiltration, stabilize fines, and maintain the clarity and reliability of the groundwater entering domestic wells.

96. At the West Campus, these soils were disturbed by massive, sudden land clearing, deforestation, blasting, excavation, trenching, and construction activity with insufficient

⁹ <https://epd.georgia.gov/document/publication/ha-18-most-significant-ground-water-recharge-areas-georgia-1989/download> (emphasis added).

safeguards and practices in place by Construction Defendants , with such work performed at the request and direction of Meta Defendants, on property owned and operated by Development Authority.

97. At the East Campus, these soils – the shallow aquifer system comprising the Most Significant Ground-Water Recharge Area on which Plaintiffs’ properties sit, were further disturbed as a result of rapid land-clearing, blasting, ripping, excavation, trenching, grading, land disturbing and site construction work performed at and near the East Campus site by Holder, and Plateau Excavation, at the request and direction of Meta Defendants, on property owned and operated by the Development Authority.

98. Construction Defendants’ seismic activity unleashed by explosives blasting, ripping, and related rock and dirt/earthmoving activity significantly altered the subsurface flow path of water which loosened and mobilized fines into and toward Plaintiffs’ groundwater wells.

99. The explosive detonations caused by blasting at the West Campus and along the Shire Parkway Extension disturbed and further disturbed the soils and consolidated sediments overlying the bedrock at the blast sites within the West Campus and along the Shire Parkway Extension corridor, mobilizing fine-grained soil particles, clay fines, and sediments that had previously been stable.

100. On information and belief, ripping was identified as a means of subsurface site preparation within the East Campus development footprint. Ripping causes fracturing and disturbing subsurface rock, fractured rock and soil layers that normally protect, separate or stabilize the pre-existing undisturbed aquifer system. Without proper safeguards against it, this activity creates new pathways for mobilized fines and sediment transport, and is a concurrent cause of mobilized fines and sediments to move toward Plaintiffs’ properties and onsite wells.

101. On information and belief, the blasting operations at the West Campus and within the Shire Parkway Extension corridor materially widened, extended, exacerbated or opened fracture networks within the existing bedrock and in overburden soils at the blast sites and the surrounding subsurface, creating new pathways or exacerbating previously existing pathways for the migration of then newly mobilized fines and sediments into the fractured bedrock aquifer system, or further mobilizing sediments and fines within the already disturbed system.

102. On information and belief, due to their development, land disturbing and construction activity, the now disturbed, mobilized fines and sediments entered and were released into the area aquifer, migrating through fracture conduits into the regional groundwater flow system, including the nearby Most Significant Ground-Water Recharge Area where Plaintiffs' properties and onsite wells are located.

103. A substantial portion of the East Campus is located within the Most Significant Ground-Water Recharge Area, whose western edge is located proximate to the blasting activity occurring at least as of March 29, 2024 along the Shire Parkway Extension, and the extensive blasting, crushing of stone, and land disturbing activity conducted at the West Campus.

104. Upon information and belief, prior to the commencement of the East Campus development project, including associated explosives blasting and pre-blasting planning, Meta Defendants, through Construction Defendants, engaged in an application and permitting process, including the development of pre-blast surveys, inspections, grading plans, drainage plans, and stormwater management reports for the project, among other submittals, exercising control over their planning, coordination, and land disturbing activities at the Meta Stanton Springs Data Center site.

105. When development of Meta's East Campus removed the vegetative cover, stripped away soil, blasted bedrock nearby, and opened large areas of disturbed earth, it directly altered the natural recharge process operating in this zone designated by the Georgia Geologic Survey as "...likely to have the greatest vulnerability to pollution of ground water from the surface and near surface activities of man."

106. Given (i) this "greatest vulnerability to pollution of ground water" designation; (ii) the nature and scale of Defendants' blasting, excavation and other land-disturbing activity; (iii) the proximity of this activity to the Plaintiffs' properties, and other information known to these Defendants including previous development, blasting, excavation and land disturbing activity at the initial West Campus phase, it was foreseeable and was actually foreseen by Meta Defendants, Construction Defendants, and the Development Authority that Plaintiffs' properties and their residential wells were placed at risk for mobilized sediment impacts, including pollution of their wells.

107. Nevertheless, these Defendants acted in concert to engage in these activities, despite the presence of private residential wells and homes within a short distance of these significant land-disturbing activities.

108. This rapid deforestation at the East Campus site and removal of topsoil to below the previously existing root structure, excavation and grading increased surface water and rainfall infiltration as well as sediment migration into the shared portion of the Most Significant Ground-Water Recharge Area underlying much of the East Campus and Plaintiffs' properties, which is continuing.

109. Plaintiffs rely on the groundwater aquifer as their sole source of water used to prepare food, wash clothes, supply their home fixtures and appliances, and otherwise live and sustain themselves in their homes.

110. As groundwater is drawn in from the aquifer, Plaintiffs' wells are intercepting large concentrations of sediment in groundwater due to Defendants' operations in developing, constructing and maintaining the Meta Stanton Springs Data Center with inadequate and improperly maintained BMPs. This contamination is continuing to encroach upon and contaminate Plaintiffs' properties, onsite wells, and home plumbing, fixtures and appliances.

111. Plaintiffs have independently documented high levels of contaminated water at their homes. The reddish fines and sediment accumulating in Plaintiffs' water systems match the color and characteristics of the exposed red-clay soils on Defendants' construction site at the East Campus and related infrastructure, including a junction box terminal purportedly used for fiber optic cabling.

112. Disturbances of significant-recharge soils as described herein can reasonably be expected to increase the downward migration of fine sediment, contribute to turbidity pulses after storms, and alter flow paths into the shallow aquifer. Plaintiffs' wells are now drawing in contaminated water from these disturbances due to Defendants' improper and inadequate BMPs and land disturbing activity.

113. Through these activities, Defendants have destabilized the soils through which percolating water and groundwater enter and move about the aquifer, entering and underlying Plaintiffs' properties. Now disturbed, these soils continue to readily transmit fine sediment to Plaintiffs' wells.

114. Plaintiffs have incurred significant trouble and expense in their attempt to maintain basic household functions that require clean, running water, such as hand washing, brushing teeth, using the bathroom, bathing, cooking, cleaning, drinking, washing clothes, and caring for pets and farm animals.

115. After Defendants' land disturbing, construction and development operations near the Morris and Wilson Plaintiffs' properties commenced in approximately late 2020 at the East Campus phase, Plaintiffs began to experience significant soil disruption and water degradation, resulting in (but not limited to) the following:

- a. Sediment-laden, cloudy, reddish well water;
- b. Degradation of the home water filters, requiring unreasonable frequent filter changes due to sediment intrusion in the home water supply;
- c. Clogged pipes, water supply lines and fixture failures due to sediment build up;
- d. Malfunction and premature failure of water-dependent appliances, such as washing machines and refrigerators; and
- e. Reduced or impaired daily water function, such as lacking water pressure and temperature control, and inability to operate more than one bathroom at a time.

116. Ziegler Plaintiffs and Clack Plaintiffs subsequently discovered sediment impacts in their water supply systems similar to that of the Morris Plaintiffs and Wilson Plaintiffs.

117. The Ziegler Plaintiffs' well was installed in spring 2021, and their water heater failed by the following spring due to sediment intrusion, needing replacement soon after they moved into their home.

118. The Clack Plaintiffs' water heater failed in the summer of 2025, reporting heavy silt and sediment impacts drawn from their private well.

119. Plaintiffs' pre-purchase home inspections independently demonstrate these conditions did not exist until Defendants disrupted the aquifer by leveling hundreds of acres,

blasting into bedrock, trenching, and constructing its massive industrial site with manifestly improper and inadequate perimeter containment or site control that would otherwise prevent it from unleashing masses of sediment into the water table, which are now entering Plaintiffs' properties and onsite domestic wells.

120. In July 2020, the Wilson Plaintiffs engaged a certified home inspection, documenting the onsite well conditions as having no issues with respect to sediment or siltation – Figure 9 below depicts the Wilson Plaintiffs' whole home water filter drawn from their groundwater well, as of their July 2020 Home Inspection Report:



121. Figure 11 below is the same whole home water filter on December 8, 2025, clogged with sediment that is continually intruding their home, interior pipes, water lines, fixtures and appliances from their groundwater well as a direct result of Defendants' land disturbing, development, design, and construction activities. The filter had just been replaced a month prior, as shown in Figure 10:



Figure 10 (Wilson water filter being replaced Nov. 9, 2025)



Figure 11 (Wilson water filter, December 8, 2025)

122. The following photos illustrate the Wilson Plaintiffs' well water taken November 9, 2025, together with sediment-laden whole home water filters:



Nov. 9, 2025 (sediment-clogged filters)

123. The Wilson Plaintiffs have endured malfunction or failure of multiple appliances that are supplied with this contaminated, sediment-laden water derived from Defendants' site

construction and land-disturbing activities in developing the East Campus, necessitating the replacement of their water heater, frequent water filter changes, and repeated repair expenses to address sediment-impacted internal pipes and water supply systems.

124. The Wilson Plaintiffs have incurred expenses for plumbing repairs that only provide temporary relief until the return of continual sediment intrusion introduced by Defendants' tortious conduct in the development of the East Campus of the Meta Stanton Springs Data Center.

125. Due to the constant low water pressure, the Wilson Plaintiffs often must time their respective use of household water amongst each other to carry out basic household functions, such as showering, using the bathroom, or washing clothes.

126. The Wilson Plaintiffs have had to replace multiple systems in the home that rely on well water due to the continual introduction of sediment and "muddy water," despite the relatively new age of these systems, initially installed in 2016. The washing machine the Wilson Plaintiffs replaced in 2018 now consistently reports error messages related to its water supply, likely exhibiting strain from sediment-polluted supply lines.

127. Any reservoir of water, such as bathtubs or toilet tanks, now exhibits telltale brown, sediment-laden characteristics tied to well pollution from the now-polluted aquifer.

128. Beginning in 2020, and following the land disturbing and site construction and development activities at the Meta Stanton Springs Data Center as detailed herein, the Morris Plaintiffs now suffer from a continual burden and inconvenience of polluted, sediment-laden water from their well, and low water pressure due to impaired water line function that can only be relieved by disconnecting their water lines and physically air blasting the interiors to dislodge

sediment build up, or replacing the lines. The Morris Plaintiffs have replaced certain portions of the water lines multiple times.

129. At times, the Morris Plaintiffs have been required to flush their toilets with buckets of water to generate enough water pressure to evacuate waste from their bathroom, given that their internal water supply lines lacked sufficient water pressure to fill the toilet reservoir. This highly inconvenient process has at times functionally reduced their home to a single bathroom, as opposed to a home with two-and-a-half bathrooms.

130. At times, the Morris Plaintiffs' kitchen sink no longer supplied sufficient cold water, requiring frequent trips to other rooms to fill buckets to provide enough water to perform basic household tasks, such as rinsing dishes or preparing food.

131. At times, the bathroom of the Morris Plaintiffs' son ran mostly hot water from the water heater reservoir, causing scalding hot water during showers because of the insufficient supply of cold water due to lack of water pressure in the cold-water line from clogged water lines.

132. To temporarily restore basic plumbing functions to their home, the Morris Plaintiffs have had to shut off all their water, air blast their supply lines to clear them of sediment and replace sections of their plumbing and fixtures to remove portions impacted by sediment.

133. To date, the Morris Plaintiffs have spent thousands of dollars to repair or replace their interior pipes, fixtures, and water appliances, and sometimes needing to borrow money to do so. These repairs and mitigation measures are merely temporary until the sediment that now permeates the aquifer under their home again overwhelms the home's water supply infrastructure. Defendants are each a cause and contributor to this sediment intrusion onto the Morris Property, harming the Morris Plaintiffs.

134. The Clack Plaintiffs experience sediment intrusion in their well, hot water heater and interior pipes and fixtures, unreasonable noise and light intrusion from the Meta Stanton Springs Data Center.

135. The Ziegler Plaintiffs experience sediment intrusion in their well, requiring frequent water filter changes and undue stress on home appliances and interior plumbing from sediment in the aquifer supplying their home. The surface water creek that used to provide continual seasonal flow on their property has now been substantially reduced following Construction Defendants' land-disturbing activity at the East Campus, undertaken at the direction of and for the benefit of Meta Defendants and the Development Authority.

136. The impacts to Plaintiffs' water supply described herein are the direct result of a disturbed aquifer transporting fine sediment from the Meta Stanton Springs Data Center to Plaintiffs' nearby wells and properties.

137. The impacts to Plaintiffs' water supply were entirely foreseeable given the size, scope, nature, and duration of Defendants' site development, land disturbing, construction activity and ongoing operation, ownership and control over the Meta Stanton Springs Data Center.

138. As a result, and as described herein, Construction Defendants' harmful land disturbance and construction activities have caused and continue to cause silt, sediment, stormwater and other pollutants to discharge, migrate, and enter Plaintiffs' properties, acting concurrently with Meta Defendants and Development Authority.

139. As landowner, the Development Authority actively participated in the siting, development, and continuing operation and maintenance of the Meta Stanton Springs Data Center, including the improper and negligent development, land-clearing, mass-grading, rapid

deforestation with improper stormwater and sediment/erosion controls, siting, blasting, excavation, grading, and subsurface excavation thereon which have caused Plaintiffs past and ongoing damage to their real property.

140. Development Authority's actions and failures to act, Meta Defendants' actions and failures to act, and Construction Defendants harmful land disturbance, construction and design activities with insufficient BMPs and other failures, have interfered, and continue to interfere, with Plaintiffs' use and enjoyment of their property.

141. Plaintiffs never consented to the discharge, migration or entry of silt, sediment, turbidity or pollution on their properties, contamination of their residential wells or intrusion by these pollutants into their homes, interior water lines, pipes or fixtures from Defendants' acts and omissions detailed herein.

F. Continuous Nuisance and Trespass of Dust, Illumination, and Noise on Plaintiffs' Properties

142. The development of the Meta Stanton Springs Data Center exposed Plaintiffs to industrial-scale dust, light pollution, and noise from the East Campus.

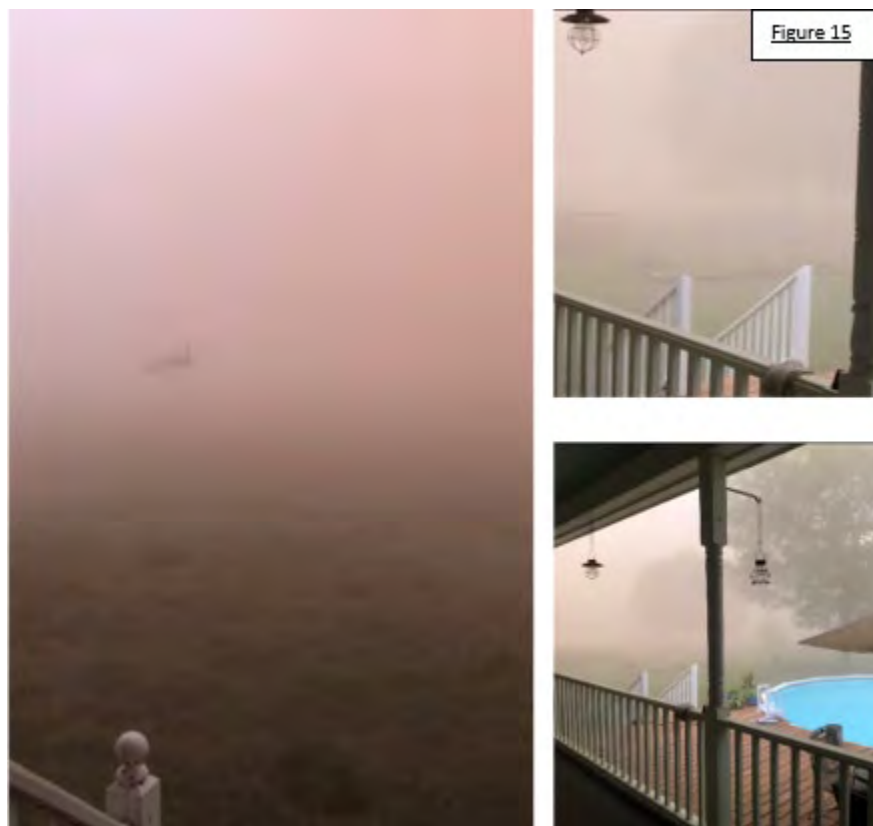
143. Specifically, Construction Defendants' mass deforestation and grading, at the direction and for the benefit of Meta Defendants and the Development Authority, removed the vegetative layer and buffer between the site for the East Campus of the Meta Stanton Springs Data Center and Plaintiffs' properties, leaving large areas of exposed red clay susceptible to wind erosion due to Defendants' continuous failure to implement proper dust control and perimeter containment at the site.

144. These mass deforestation and grading efforts to develop the East Campus were not insignificant or limited occurrences, but instead took place over several months, and were the product of deliberate planning decisions by Construction Defendants, under aggressive

timeframes set by the Development Authority and Meta Defendants concerning the means and methods to engage in this site development work, the crews needed, the equipment and mitigation measures to be employed or not used, and the sequence of these activities.

145. During this land-disturbing, construction and site development work at the East Campus, these Defendants generated or caused to be generated mass plumes of dust from these disturbed soils that repeatedly migrated off the East Campus and settled onto Plaintiffs' properties.

146. As a result of Defendants' construction activities, Plaintiffs were subjected to the nuisance of dust clouds crossing Sewell Lane and onto their properties, coating porches, vehicles, outdoor furniture, and household surfaces, exposing them and their animals to Defendants' construction pollution. On multiple occasions, the airborne particulates from the East Campus were dense enough to reduce visibility and force Plaintiffs indoors.



147. Plaintiffs have been forced to change their clogged HVAC filters with unusual frequency, which were overwhelmed with high volumes of fine dust infiltrating their homes and interior air.

148. The Wilson Plaintiffs were required to replace their HVAC system prematurely, likely due to increased stress placed on the system having to contend with the impacts caused from Defendants' construction operations on the East Campus.

149. The dust conditions alleged herein did not otherwise exist or occur before Defendants' large-scale land disturbance and ongoing operations across Sewell Lane from their homes.

150. The lack of trees and vegetation, and inadequate measures to control light pollution at and from the East Campus have further caused a trespass and nuisance for the Morris Plaintiffs, specifically, in that their living and bedroom spaces are now perpetually illuminated throughout the evening from Defendants' elevated, high-intensity exterior lighting and property owned by Development Authority.

151. The lighting conditions on the East Campus worsen during overcast or cloudy evenings, as cloud conditions or low-lying mist act as light reflectors off the intense exterior lighting system, creating a relatively brighter skyglow extending from the East Campus of the Meta Stanton Springs Data Center directly into the Morris Plaintiffs' home after dark.

152. For example, the interior of the Morris Property is frequently illuminated through its doors and windows during the nighttime due to Defendants' unreasonable industrial-grade light intrusion from the East Campus.

153. Prior to the development of the Meta Stanton Springs Data Center, the stars were visible in the clear night sky and the Morris Plaintiffs enjoyed residing in a rural-residential area without the intrusion of artificial lighting on their properties and into their homes after dark.

154. Now, significant light intrusion onto the Morris Property from the East Campus is inconsistent with rural-residential use and is a continual disruption to the quiet enjoyment of the Morris Property.

155. Defendants' illumination of the East Campus at nighttime exceeds levels necessary for any reasonable purpose that might justify the annoyance and inconvenience imposed on the Morris Plaintiffs, creating an avoidable, continuous, and foreseeable light trespass and nuisance. These conditions are not intermittent. They consistently inflict hurt, annoyance and inconvenience, and disrupt the peace and enjoyment once enjoyed by the Morris Plaintiffs each evening where light remains visible after nightfall, including the conditions illustrated below, photographs taken January 24, 2024 nearly 2:00 a.m. Eastern and May 8, 2025 at 9:19 pm Eastern:

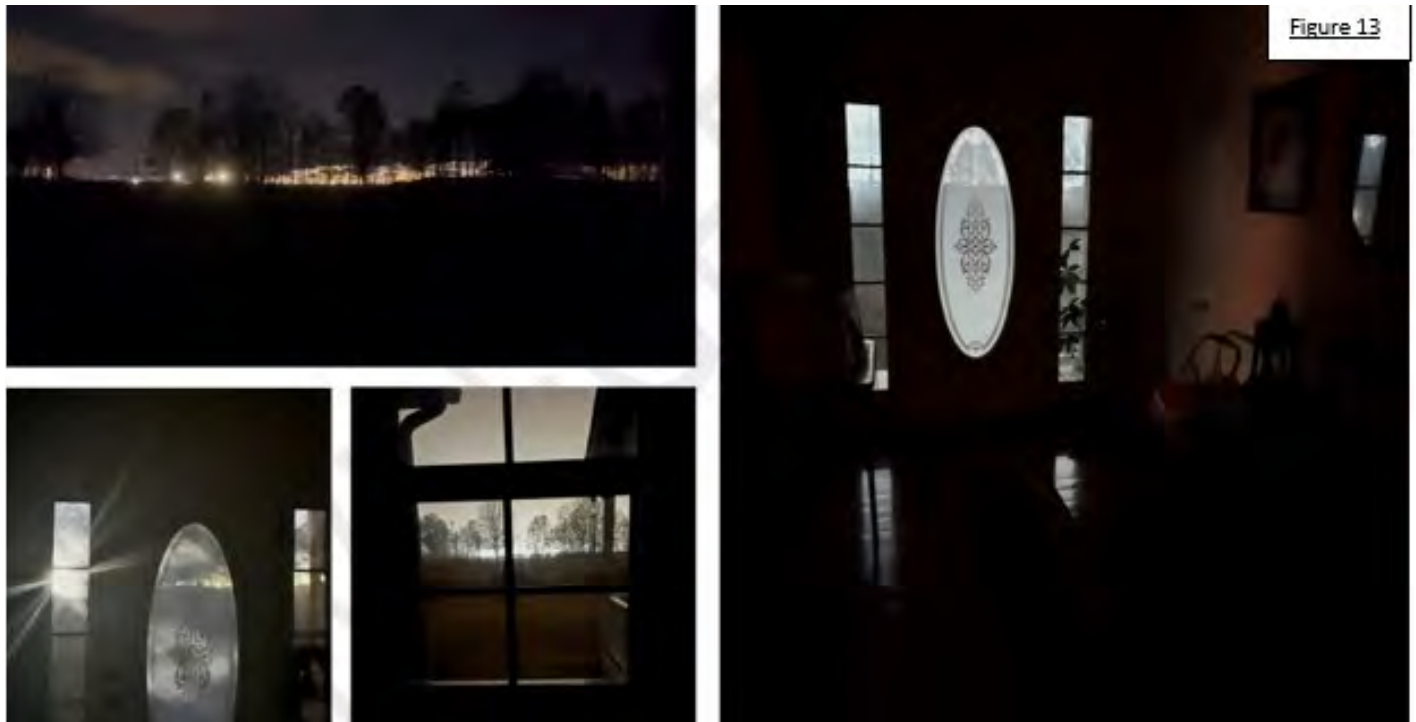


Figure 13

156. The Development Authority owns the property on which the East Campus now sits, and therefore exercises control over the means by which this intrusive light pollution is entering the Morris Property and the family's home each evening. By failing and refusing to adequately cease or remedy these conditions, the Development Authority is concurrently responsible for the continuing harms inflicted on the Morris Plaintiffs from this light intrusion, even after receipt of notice of these conditions as of January 2026 (Exhibit C).

157. The absence of tree cover and adequate sound barriers— due to Defendants' mass deforestation and grading of the East Campus, and installation of diesel power generators, chillers and cooling infrastructure with inadequate sound dampening measures—renders the Meta Stanton Springs Data Center both a source for industrial noise and a conduit of increased traffic noise from Interstate 20, causing a continuous trespass and nuisance on Plaintiffs' properties.

158. The industrial noise generated by Defendants from the East Campus, namely power generators, alarms, heavy equipment, and cooling infrastructure, produces sustained sound levels exceeding normal rural-residential expectations, thus negatively impacting Plaintiffs' reasonable expectations of quiet enjoyment of their properties.

159. Plaintiffs have been subjected to high-pitched alarms, loud generator noise variously occurring day and at night, and persistent daytime disturbances from construction and ongoing operations of the East Campus.

160. Plaintiffs reasonably fear that the more than 100 diesel-fueled power generators are releasing or may release an unreasonable level of air pollution into the nearby atmosphere, exposing them to a harmful, injurious, or otherwise objectionable concentration, duration, and frequency of airborne particulates, including stack emissions and fumes associated with industrial-scale diesel combustion that any reasonable residential area would find offensive, harmful, and a nuisance.

161. The Development Authority owns the property on which the East Campus now sits, and therefore exercises control over the means by which this noise and air emissions are entering onto and encroaching Plaintiffs' properties. By failing and refusing to cease or remedy these conditions, the Development Authority is concurrently responsible for the continuing harms and threats of harm inflicted on the Plaintiffs from Defendants' construction, design, and operation of the East Campus of the Meta Stanton Springs Data Center, even after receipt of notice of these conditions as of January 2026 (Exhibit C).

162. Plaintiffs never consented to being subjected to unreasonable noise or air emissions entering their properties and homes from the Stanton Springs Data Center.

163. Plaintiffs have experienced sleep disruption, increased stress and anxiety following construction and initial operation of the East Campus, which has diminished and degraded their quality of life.

164. Beyond the well contamination, disruption to the aquifer within a Most Significant Ground-Water Recharge Area, dust, audible noise, light pollution and air emissions described herein, Plaintiffs have had to further endure ongoing, highly disruptive electrical instability since operations began at the East Campus. As a result, Plaintiffs are left with a reasonable fear of perpetually unreliable electrical supply, permanent electrical failure or damage to their appliances, compromised safety, and further degradation of property value.

165. The Plaintiffs did not consent to the introduction of muddy water, turbidity, silt, sediment, fines, clays, excessive evening light intrusion, noise, particulate and chemical air emissions onto their properties. The continuing invasion of their properties by the same is a trespass.

166. The continuing invasion of their properties by these substances, including sediment in their water supplies, and instances of light intrusion, noise, vibrations and air emissions have interfered with Plaintiffs' use and enjoyment of their properties and substantially diminished the value of their properties.

G. Notice and Demand to Development Authority

167. On January 23, 2026, Morris Plaintiffs and Wilson Plaintiffs through counsel presented their claims in writing to the Development Authority and its legal counsel. (Exhibit C)

168. These Plaintiffs identified a description of their claims, including the time, place, and extent of these Plaintiffs' injuries as nearly as practicable, and the acts of the Development

Authority which caused the injuries, and a specific amount of monetary damages sought that constituted their offer of compromise.

169. These Plaintiffs further identified the negligence, as well as intentional conduct, of the Development Authority which caused the injury.

170. While Plaintiffs dispute any ante litem notice is required for Joint Development Authorities, these Plaintiffs provided notice and demand pursuant to O.C.G.A. §§ 36–33–5, 36–11–1, and any and all other applicable statutes of the Official Code of Georgia.

171. These Plaintiffs further demanded the Development Authority to identify any reason the letter did not constitute adequate notice.

172. The Development Authority responded to these Plaintiffs’ claims in writing on March 27, 2026.

173. The Development Authority did not accept these Plaintiffs’ specific amount of monetary damages sought that constituted their offer of compromise, nor did it convey any alternative offer to Plaintiffs.

174. The Development Authority did not identify any reason these Plaintiffs’ letter did not constitute adequate notice pursuant to O.C.G.A. §§ 36–33–5, 36–11–1, and any and all other applicable statutes of the Official Code of Georgia.

CAUSES OF ACTION

COUNT I - CONTINUING NUISANCE

(ALL DEFENDANTS)

175. Plaintiffs adopt and incorporate by reference all the preceding factual allegations as if fully restated verbatim herein.

176. Defendants' land disturbing and development activities, and operation of the Stanton Springs Data Center, including the East Campus site and associated areas, have resulted in the continuous and harmful discharge of silt and sediment-laden water, eroded soils, muddy water and other pollutants from the development site and onto the Morris Property.

177. Defendants' land disturbing and development activities, and operation of the Stanton Springs Data Center, including the East Campus site and associated areas, have resulted in the continuous and harmful entry, migration, and intrusion of silt and sediment-laden ground water, mobilized soils, fines, and soil particles, muddy water and other pollutants from the development site onto Plaintiffs' properties, including their residential water supply wells, and their interior water lines, pipes, fixtures, and appliances.

178. These continuous and harmful discharges, entry, migration, and intrusion of silt, sediment, mobilized soils, fines, muddy water, and particles have caused damage to Plaintiffs and their properties and have interfered with Plaintiffs' full use and enjoyment of their properties. That damage to Plaintiffs and their properties is substantial, material, and unreasonable.

179. Defendants' construction and development activities, and operation of the Stanton Springs Data Center, including the East Campus site that, by its design and function, and by the failure of proper mitigation, noise and light controls, operational measures and practices, have caused unreasonable groundwater contamination, surface discharges of sediment, light intrusion, and airborne pollution on neighboring properties of Plaintiffs.

180. Defendants' acts and omissions constitute a continuing private nuisance within the meaning of O.C.G.A. § 41-1-1 for which Defendants are liable to Plaintiffs consisting of: (1) continuous, harmful discharges, entry, migration, and intrusion of silt, sediment, mobilized soils, fines, muddy water, and particles from their development site and onto Plaintiffs' properties; and

(2) continuous, harmful and unreasonable intrusion and entry onto their properties with light, noise, and air emissions from the Meta Stanton Springs Data Center.

181. Meta Defendants have the control, authority and power to abate the nuisance but failed and refused to do so, and thus they are a direct cause of the maintenance and continuance of the nuisance, interfering with Plaintiffs' property rights and use and enjoyment of the same and diminishing the value of Plaintiffs' properties.

182. Construction Defendants controlled the cause and maintenance of this continuing nuisance, and maintain the ability to abate the nuisance, but have allowed these harms to continue without abatement measures, interfering with Plaintiffs' property rights and use and enjoyment of the same, and diminishing the value of Plaintiffs' properties.

183. Development Authority, as landowner, has the power and control to compel Construction Defendants and Meta Defendants to abate the nuisance but has allowed it to continue without abatement measures, and thus, has participated in the maintenance of the nuisance, interfering with Plaintiffs' property rights and use and enjoyment of the same, and diminishing the value of Plaintiffs' properties.

184. The harm caused by Defendants' conduct is not fanciful, or such as would affect only one of fastidious taste; rather, Defendants' conduct is such that it affects all ordinary, reasonable persons who use and enjoy the land and waters, including drinking water. *See* O.C.G.A. § 41-1-1.

185. Pursuant to O.C.G.A. § 41-1-3, Plaintiffs have suffered, and will continue to suffer, special damages from Defendants' conduct because such conduct, which is the cause of the continuing contamination, unreasonable light emission, noise and particulate emissions directly affects them and their properties. The silt, sediment, muddy water, clays, fines and

contamination has invaded their properties, groundwater, drinking water and surface water, and the unreasonable noise, exposure to air emissions and light during evenings has interfered with their use and enjoyment of their properties.

186. Following Defendants' land-disturbing activities at the East Campus, the Ziegler Plaintiffs' surface water creek flow on their property was significantly altered and diminished, reducing the Ziegler Plaintiffs' use and enjoyment of their property.

187. As a direct and proximate result of Defendants' creating and maintaining a continuing nuisance, Plaintiffs and their properties have suffered damages including, but not limited to: (1) the diminished value of their properties; (2) interference with their use and enjoyment of their properties; and (3) hurt, discomfort, upset, annoyance and inconvenience. Plaintiffs should be compensated for such damages in an amount and manner to be determined by the enlightened conscience of the jury trial.

188. Because of Defendants' repeated nuisances, Plaintiffs are entitled to an injunction and other equitable relief requiring Defendants to abate the nuisance, including: (1) ceasing the discharge of sediment-laden stormwater, muddy water, turbidity, silt, clay and other pollutants from the Meta Stanton Springs Data Center and related development areas onto the Morris Property during rain events; (2) ceasing, abating and remediating the entry, intrusion, migration, and pollution of the aquifer on Plaintiffs' properties and entering Plaintiffs' wells, as well as their homes, water lines, plumbing, fixtures, and appliances; (3) ceasing, abating, and remediating unreasonable light intrusion after dark, noise, and airborne particulates from the Meta Stanton Springs Data Center site onto Plaintiffs' properties; and (4) restoration of Plaintiffs' properties to the conditions that existed prior to development of the West Campus and the East Campus,

including restoration of streamflow on the Ziegler Property, and restoration of air quality from airborne industrial emissions.

COUNT II - CONTINUING TRESPASS

(ALL DEFENDANTS)

189. Plaintiffs adopt and incorporate by reference all the preceding factual allegations as if fully restated verbatim herein.

190. As a result of Defendants' land disturbing, development, construction, operation and ownership of the Meta Stanton Springs Data Center and associated areas, Defendants have knowingly, willfully and intentionally discharged excessive and harmful volumes of silt, fines, clays, eroded soils, sediment, muddy water and other pollutants onto Plaintiffs' properties, including their wells and interior pipes, water lines, fixtures, and appliances, and onto the Morris Plaintiffs' drainage areas, stormwater ditches, and yards, which are violating Plaintiffs' right to exclusive possession of their properties.

191. As a result of Defendants' construction, development, and operation and ownership of the East Campus site and associated areas, Defendants have knowingly, willfully and intentionally caused excessive and unreasonable emissions of light and noise onto Plaintiffs' properties, including repeated light intrusion within the interior of the Morris Plaintiffs' home after dark, all of which conduct is violating Plaintiffs' right to exclusive possession of their properties.

192. Plaintiffs have not consented to these invasions of their properties and property rights caused by Defendants' acts and omissions.

193. These unpermitted invasions of Plaintiffs' properties have resulted in the diminution of Plaintiffs' property values. The value of Plaintiffs' homes are substantially

impaired by water that is contaminated by silt, sediment, clays and fines; low and inconsistent water pressure; the need for frequent filter changes and repairs to interior water supply lines and water infrastructure; stresses on appliances and fixtures that frequently malfunction and fail, requiring repair, replacement, and periods where they are unable to be used; proximity to a massive industrial complex that emits unreasonable levels of noise and air emissions, and unreasonable light intrusion; and other harms detailed herein.

194. Defendants' repeated, continual discharge and migration, entry and invasion of Plaintiffs' properties by excessive and harmful amounts of silt, sediment, fines, clays and turbidity, light, and noise onto Plaintiffs' properties constitutes a trespass within the meaning of O.C.G.A. § 51-9-1.

195. Defendants' repeated, continual discharge and migration, entry and invasion of Plaintiffs' properties by excessive and harmful amounts of silt, sediment, fines, clays and turbidity, light, and noise onto Plaintiffs' properties constitutes a continuing trespass for which Defendants are liable to Plaintiffs.

196. As a direct and proximate result of Defendants' continuing trespasses, Plaintiffs and their properties have been damaged, and their property values diminished, and Plaintiffs should be compensated in an amount and manner to be determined at trial.

197. Because of Defendants' repeated trespasses, Plaintiffs are entitled to recover damages for the interference with their use and enjoyment of their property and their hurt, annoyance, and inconvenience in an amount to be determined by the enlightened conscience of a jury.

198. Because of Defendants' repeated, harmful and unreasonable trespasses, Plaintiffs are entitled to an injunction requiring Defendants to abate the discharges, entry, pollution, and

invasion of their properties, wells, and homes by sediment, silt, clays, fines, turbidity, and light pollution, unreasonable noise, and other interferences with their use and enjoyment of their properties from the Meta Stanton Springs Data Center.

COUNT III - NEGLIGENCE
(ALL DEFENDANTS)

199. Plaintiffs adopt and incorporate by reference all the preceding factual allegations as if fully restated verbatim herein.

200. At all relevant times, Defendants owed Plaintiffs a duty of ordinary care to develop and operate the Meta Stanton Springs Data Center, including the East Campus and West Campus sites, in a manner that did not unreasonably disturb, injure, or interfere with the rights and use of properties of neighboring landowners, including Plaintiffs. This duty arises under the common law of Georgia as codified in O.C.G.A. § 51-1-2, and is grounded in the recognized principle that every person owes a duty to exercise ordinary care to avoid injury to others.

201. Development Authority, as landowner and developer of the Meta Stanton Springs Data Center, has a duty to develop and operate that land in a manner that does not injure the property of nearby landowners, such as Plaintiffs.

202. Meta Defendants and Construction Defendants, as developers of the Meta Stanton Springs Data Center, have a duty to use and develop the land in a manner that does not injure the property of nearby owners, such as Plaintiffs.

203. Defendants have a duty not to create and/or maintain conditions resulting in the continuous and harmful discharge of silt and sediment-laden stormwater, eroded soils, muddy water, and other debris onto the Morris Property.

204. Defendants have a duty not to create and/or maintain conditions resulting in the continuous and harmful discharge of silt, fines, clays, and/or sediment-laden, muddy water, and

other harmful substances onto Plaintiffs' properties, including their groundwater wells, the underlying aquifer supplying those wells, and their homes, including the interior water lines, plumbing, fixtures and appliances.

205. Defendants' duty of care included but is not limited to the obligation to engage in siting, preparation, and implementation of land disturbing, construction and development activities and employing appropriate BMPs and other measures to prevent and minimize the continuous, harmful discharge, migration, and entry onto neighboring properties of silt, fines, clays, and sediment, including sediment into onsite wells and interior plumbing, water lines, fixtures and appliances; and promptly investigate and remediate these harms upon learning of the intrusion, discharge, and migration onto neighboring properties.

206. Defendants further owed Plaintiffs a duty arising from their development, ownership and operation of a facility that, by its design and function, and by the failure of proper mitigation, airborne dust, air emissions, noise and light controls, operational measures and practices, posed a foreseeable risk of unreasonable light intrusion, and airborne pollution onto neighboring properties. A reasonable hyperscale data center developer and operator in Defendants' position would have recognized this risk and taken adequate precautions to prevent the harms to Plaintiffs as detailed herein.

207. Defendants have breached their duties by developing, maintaining and operating the Stanton Springs Data Center, including the East Campus and associated areas, in a manner that has caused the continuous and harmful discharge, entry, migration, and contamination of soils, silt, sediment, clays and fines from their development site and onto Plaintiffs' properties.

208. Defendants have breached their duties by failing to adequately prepare, construct and operate the Meta Stanton Springs Data Center to prevent or adequately control unreasonable

emission of airborne construction dust, operational air emissions from diesel power generators, light pollution, and noise; by selecting, installing, and operating mechanical equipment that generates light, noise, and air emissions at levels and time periods that are unreasonable and without sufficient control measures or operational practices; and by failing to remediate these conditions after receiving actual notice of the harms to Plaintiffs.

209. Defendants breached their duty of ordinary care by, among other things: (a) selecting a site for hyperscale data center development atop and in close proximity to a Most Significant Ground-Water Recharge Area where residential homes relying on private groundwater wells are located; (b) engaging in rapid mass deforestation, grading, blasting, excavation, and other land-disturbing activities without implementing adequate erosion and sedimentation controls, stormwater best management practices, or perimeter containment sufficient to prevent offsite discharges and groundwater contamination; (c) failing to conduct adequate pre-development analysis of the risk their activities posed to neighboring properties and the shared aquifer system; (d) failing to install, maintain, or operate noise, light, dust, and air emission controls adequate to prevent unreasonable intrusion onto Plaintiffs' properties; and (e) failing to investigate, remediate, or abate the continuing harms to Plaintiffs' properties after receiving actual notice of those harms.

210. Defendants' breaches of their duties of ordinary care were the direct and proximate cause of Plaintiffs' injuries. But for Defendants' failures to implement adequate BMPs, erosion controls, and stormwater management measures during development and construction, the sediment, silt, fines, and clays mobilized by their land-disturbing activities would not have migrated into the shared aquifer and onto Plaintiffs' properties. But for Defendants' site selection and development of the East Campus atop a Most Significant Ground-

Water Recharge Area without adequate safeguards, the aquifer supplying Plaintiffs' wells would not have been contaminated.

211. But-for Defendants' failure to install proper noise, light, and air emission controls, Plaintiffs would not have been subjected to unreasonable industrial noise, light intrusion, dust, and air pollution. The harms to Plaintiffs were a natural, probable, and foreseeable consequence of Defendants' negligent conduct.

212. There is a direct causal connection between Defendants' breaches and the injuries sustained by Plaintiffs. Plaintiffs' well water was clear and free from sediment contamination prior to Defendants' land-disturbing activities. The contamination of Plaintiffs' wells with sediment, silt, and fines commenced only after Defendants began their development operations at and near the Meta Stanton Springs Data Center. The temporal and spatial relationship between Defendants' activities and Plaintiffs' injuries, the hydrogeological connection between the development site and Plaintiffs' wells through the shared fractured-rock aquifer system, and the absence of any other intervening cause establish that Defendants' negligent conduct was the proximate cause of Plaintiffs' damages.

213. Defendants' actions and failures to act are the proximate cause and cause in fact of damages to Plaintiffs and their properties.

214. The harms caused by Defendants' acts and failures to act are continuing.

215. As a direct and proximate result of the Defendants' actions, and failures to act, Plaintiffs and their properties have been damaged, and Plaintiffs should be compensated in an amount and manner to be determined at trial.

**COUNT IV - STRICT LIABILITY, ULTRAHAZARDOUS ACTIVITY
(HOLDER, PLATEAU EXCAVATION, META DEFENDANTS, DEVELOPMENT
AUTHORITY)**

216. Plaintiffs adopt and incorporate by reference all the preceding factual allegations as if fully restated verbatim herein.

217. The use of explosives to conduct blasting operations is an ultrahazardous and abnormally dangerous activity. Blasting with explosives involves a risk of serious harm that cannot be eliminated by the exercise of reasonable care, and the extent and severity of a given blast and its consequences to the surface, near surface, or subsurface are incapable of precise prediction.

Plateau Excavation

218. At all times relevant hereto, Plateau Excavation conducted explosives blasting operations at or near the Meta Stanton Springs Data Center East Campus, at least as of March 29, 2024.

219. At all times relevant hereto, Plateau Excavation conducted explosives blasting operations at or near the Meta Stanton Springs West Campus, entailing the blasting of 155,000 cubic yards of rock.

220. On information and belief, these detonations occurred on multiple instances commensurate with the rapid movement, dislodging by concussive and seismic blasting and excavation of a massive volume of rock and dirt, totaling at least 155,000 cubic yards, or 4.2 million cubic feet, at the work site.

221. Plateau Excavation, by physically conducting the explosive blasting at the Meta Stanton Springs Data Center site and associated areas, engaged in an ultrahazardous activity, assuming full responsibility for the consequences of that activity regardless of the degree of care exercised.

222. As a direct and proximate result of Plateau Excavation's ultrahazardous blasting operations at the West Campus site, the fines and sediments described herein were mobilized, the underlying soils and rock were disturbed, and, alone, or together with other conditions at the site and nearby areas, including removal of trees and vegetation which left bare earth to receive rainfall and percolating water driving downward to the subsurface, introduced mobilized sediment, silt, clays and fines into the aquifer supplying Plaintiffs' drinking water wells, causing damages described herein.

223. As a direct and proximate result of Plateau Excavation's ultrahazardous blasting operations at and within the footprint of the East Campus site and/or along the corridor of the Shire Parkway Extension on or about March 29, 2024, the fines and sediments described herein were mobilized, and the underlying soils and rock were further disturbed. The seismic activity unleashed by such blasting conducted by Plateau Excavation, alone, or together with Plateau Excavation's previous ultrahazardous blasting at the West Campus site, together with removal of trees and vegetation which left bare earth to receive rainfall and percolating water driving downward to the subsurface at and within the East Campus footprint, introduced and exacerbated mobilized sediment, silt, clays and fines into the aquifer supplying Plaintiffs' drinking water wells, causing damages described herein.

224. Plateau Excavation's ultrahazardous blasting at the West Campus and at the East Campus, at least within the Shire Parkway Extension corridor on or about March 29, 2024, are each a concurrent cause of the mobilized sediment, silt, clays and fines contamination of Plaintiffs' wells and interior pipes, water lines, fixtures, and appliances.

225. Plateau Excavation is strictly liable to Plaintiffs for all damages caused by its blasting operations without proof of negligence, and regardless of whether Plateau Excavation complied with all applicable industry standards, permits, approvals, or regulations.

Holder

226. At all times relevant hereto, Holder, engaged Plateau Excavation as an independent contractor to perform explosives blasting operations at the Meta Stanton Springs Data Center site and associated areas, including at the West Campus, and the area between the East Campus and West Campus along the Shire Parkway Extension corridor occurring on or about March 29, 2024, all for the benefit of the data center construction project managed by Holder.

227. Under O.C.G.A. § 51–2–5(2), an employer is liable for the negligence or tortious acts of an independent contractor when, according to the employer’s previous knowledge and experience, the work to be done is in its nature dangerous to others, however carefully performed.

228. Explosives blasting is, as a matter of law and common knowledge and experience, inherently dangerous to adjacent property owners and their groundwater supplies, however carefully performed. Holder, as a professional construction company, possessed previous knowledge and experience sufficient to know that blasting conducted relative to the Meta Stanton Springs Data Center was inherently dangerous.

229. The duty to ensure that the blasting operations did not cause harm to Plaintiffs and their properties was and is a non-delegable duty that Holder could not discharge by delegating performance of the physical blasting to Plateau Excavation. Holder remained fully liable for the tortious consequences of Plateau Excavation’s blasting operations.

230. Upon information and belief, Holder retained contractual control, and actual control over significant aspects of the blasting operations at and near the East Campus and West Campus site where blasting and related work was conducted, including site access, scheduling, inter-subcontractor coordination, and oversight of blasting plans and procedures, including pre-blast activities, surveys, and inspections conducted or that should have been conducted. These actions and levels of control subjects Holder to liability for the blasting operations under O.C.G.A. § 51-2-5(5).

231. As a direct and proximate result of the blasting operations conducted by Plateau Excavation on behalf of and under the authority of Holder, Plaintiffs have suffered the damages described herein, consisting of continual contamination of their wells, damages to their interior water lines, pipes, fixtures and appliances, and invasion of ongoing pollution of their properties by sediment, silt, muddy water, clays and fines. Holder is strictly liable to Plaintiffs for those damages.

Meta Defendants

232. On information and belief, Meta Defendants engaged Holder, and through Holder, Plateau Excavation, to perform all construction and land-disturbing activities at the Meta Stanton Springs Data Center site, including blasting and excavation activities at and near the West Campus, the East Campus, and the Shire Parkway Extension development corridor. These activities were performed for the direct benefit of Meta Defendants' hyperscale data center development project.

233. Meta Defendants are the parties for whose benefit the inherently dangerous blasting work was performed. As a contracting party that initiated and authorized the Meta

Stanton Springs Data Center development, Meta Defendants are subject to the non-delegable duty liability under O.C.G.A. § 51–2–5(2) to the same extent as Holder. Meta Defendants may not insulate themselves from liability merely by engaging Holder to in turn hire Plateau Excavation to set off the explosions and concussive forces that have disturbed the site and polluted the aquifer with sediment released therein, first at and within the West Campus, then onward along the East Campus and the Shire Parkway Extension development corridor.

234. The duty of care owed to adjacent landowners and users of the regional aquifer system, including Plaintiffs, was and is a non-delegable duty that Meta Defendants could not excuse itself from by contracting the blasting work to Holder or Plateau Excavation. The non-delegable nature of this duty is a function of the inherent danger of the work authorized, not the identity of the party who physically performs it.

235. On information and belief, Meta Defendants exercised control over the development of the site, including approval authority over construction methods, site location for placement of structures and infrastructure, blasting plans, site grading specifications, timelines, and safety protocols. This control retained by Meta Defendants independently subjects Meta Defendants to strict liability under O.C.G.A. § 51-2-5(5).

236. Meta Defendants, as the owner and operator of the Meta Stanton Springs Data Center site, are responsible for the continuing consequences of the blasting-induced groundwater contamination, including ongoing migration of the fines, clays, muddy water and sediment-laden groundwater into Plaintiffs' wells and homes.

237. As a direct and proximate result of the blasting operations conducted for Meta Defendants' benefit and under Meta Defendants' authority, Plaintiffs have suffered the damages described herein. Meta Defendants are strictly liable to Plaintiffs for those damages.

Development Authority

238. At all times during which the blasting operations were conducted at both the West Campus and East Campus, including the Shire Parkway Extension corridor extending from the West Campus to and within the East Campus footprint, Development Authority was the fee simple owner of the East Campus and West Campus site and possessed the legal right and authority to control, restrict, or prohibit activities conducted thereon, including the explosives blasting, excavation, pre-blast activities and other land disturbing activities described herein.

239. Development Authority took a direct role in making the West Campus, Shire Parkway Extension, and East Campus development sites a reality, including engaging contractors Holder and Plateau Excavation to conduct explosives blasting-related operations.

240. Development Authority authorized, permitted, and facilitated the use of the East Campus and West Campus, including areas where blasting 155,000 cubic yards of rock occurred at the West Campus, and where blasting occurred in March 2024 along the Shire Parkway Extension. By authorizing the blasting to occur on its property for the benefit of the Meta Stanton Springs Data Center development project, Development Authority assumed co-responsibility for the inherently dangerous and ultra-hazardous activity conducted on its land.

241. Under O.C.G.A. § 51–2–5(1), an employer is liable for the acts of a contractor when the work is wrongful in itself, or, if done in the ordinary manner, would result in a nuisance. The blasting operations on Development Authority’s property, which foreseeably introduced contaminants into the fractured bedrock aquifer and contaminated Plaintiffs’ drinking water supplies by polluting the aquifer underlying their properties, constituted a nuisance under O.C.G.A. § 41–1–1 et seq.

242. Under O.C.G.A. § 51–2–5(2), an employer is also liable for the work of a contractor when the work is inherently dangerous to others, however carefully performed. Development Authority, as a sophisticated property owner authorizing a major commercial construction project involving explosives blasting and excavation of several thousand cubic yards of rock and dirt, had prior knowledge sufficient to know that explosives blasting is and would be inherently dangerous to adjoining landowners such as Plaintiffs, and inherently dangerous to the underlying aquifer and Plaintiffs’ water supplies.

243. As a direct and proximate result of Development Authority’s authorization and facilitation of the blasting operations on its land and at the site consisting of the West Campus, East Campus and Shire Parkway Extension corridor, Plaintiffs have suffered damages described in this Complaint. Development Authority is strictly liable to Plaintiffs for these damages.

The ultrahazardous activity in an unreasonably unsafe location, harming Plaintiffs

244. Meta Defendants and Development Authority directed, authorized, permitted, and consented to these explosives blasting operations in unreasonable and close proximity to Plaintiffs’ properties and the western edge of the Georgia-designated Most Significant Ground-Water Recharge Area, as formally mapped by the Georgia Geologic Survey in Hydrologic Atlas 18 within which Plaintiffs’ properties and onsite wells are located.

245. On information and belief, the blasting operations involved the use of high explosives, resulting in concussive blasts, the propulsion and displacement of rock, debris, and soil, ground vibrations, and disruption of underlying soils, releasing sediments, fines, clays and dirt within bedrock fractures, all occurring within close and unreasonable proximity to Plaintiffs’ properties and the western edge of the Georgia-designated Most Significant Ground-Water

Recharge Area, as formally mapped by the Georgia Geologic Survey in Hydrologic Atlas 18 within which much of the East Campus and Plaintiffs' properties and onsite wells are located.

246. Plaintiffs' properties sustained direct, substantial damage as a proximate result of these activities, as a result of released sediments, clays and fines that have mobilized and entered the water table, rendering their residential water supply wells as receivers of sediment from the West Campus, the Shire Parkway Extension corridor and the East Campus site.

247. Morris and Wilson Plaintiffs notified Meta Defendants, Construction Defendants, and Development Authority of their damage and harms, but these Defendants have refused to remedy or abate these harms.

248. Plateau Excavation engaged in explosives blasting at the direction, consent, authorization, permission and for the benefit of Holder, Meta Defendants, and Development Authority as detailed herein, constituting ultrahazardous and abnormally dangerous activity.

249. Explosive blasting activities to remove 155,000 cubic yards of rock and dirt in a previously forested area at the West Campus site in proximity to residential homes that rely on self-supplied groundwater wells for drinking water and household use situated in a Georgia-designated Most Significant Ground-Water Recharge Area create a high degree of risk of harm to neighboring persons and property.

250. Explosives blasting activities occurring within the Shire Parkway Extension corridor on or about March 29, 2024 less than half a mile, more or less, from a Georgia-designated Most Significant Ground-Water Recharge Area where residential homes and private wells are situated create a high degree of risk of harm to neighboring persons and property, including the Morris Property located approximately 1.1 miles from such blasting activity.

251. The risk of harm cannot be eliminated by the exercise of reasonable care, given the selection of these sites for these abnormally dangerous activities, in proximity to neighboring homes, wells and a Georgia Most Significant Ground-Water Recharge Area where these properties are located.

252. This activity is not a matter of common usage in the community where it occurred.

253. This activity is inappropriate to the location where it was conducted.

254. The danger of engaging in this activity outweighs the activity's utility to the community.

255. Plateau Excavation, Meta Defendants, Holder, and Development Authority, by conducting, directing, authorizing, consenting to and benefiting from this explosives blasting engaged in ultrahazardous activities.

256. Defendants are liable to Plaintiffs for all harm proximately caused by their blasting operations, regardless of the care exercised.

257. As a direct and proximate result of Defendants' conduct and exercise of these ultrahazardous activities, Plaintiffs suffered damages to their properties, including: continuous pollution of their residential water supply wells with mobilized sediment, fines, clays, and dirt from the Meta Stanton Springs Data Center site; damage to their interior water lines, pipes, fixtures, and appliances from sediment intrusion; diminution of property value; and interference with the use and enjoyment of their properties.

258. Defendants are strictly liable to Plaintiffs for these damages.

259. The effects of Defendants' ultrahazardous blasting operations are continuing. The fracture networks opened and widened by these seismic activities continue to serve as conduits

for the migration of mobilized fines, sediment, and clays into the aquifer supplying Plaintiffs' wells.

260. Defendants' strict liability is not limited to damages occurring on the dates of detonation wherein Defendants' intentionally set off explosive and concussive forces at the West Campus and East Campus sites, but extends to all continuing and consequential harm proximately resulting from these ultrahazardous activities, including harm manifesting after the physical blasting operations ceased.

COUNT V - NEGLIGENCE PER SE

261. Plaintiffs adopt and incorporate by reference all the preceding factual allegations as if fully restated verbatim herein.

262. Under the Georgia Water Quality Control Act, it is the declared policy of the State that "water resources of the state shall be utilized prudently for the maximum benefit of the people, in order to *restore and maintain a reasonable degree of purity* in the waters of the state..." O.C.G.A. § 12-5-21 (emphasis added).

263. The purpose and intent of Georgia's water quality standards "are to provide enhancement of water quality and *prevention* of pollution; to *protect the public health or welfare in accordance with the public interest for drinking water supplies*, ... and other *reasonable and necessary uses* and to maintain and improve the biological integrity of the waters of the State." Ga. Comp. Rules & Regs 391-3-6-.03 (2)(a) (emphasis added).

264. "Water" or "waters of the State" includes ponds, drainage systems, wells, "and all other bodies of surface or subsurface water, natural or artificial, lying within or forming a part of the boundaries of the State which are not entirely confined and retained completely upon the

property of a single individual, partnership, or corporation.” Ga. Comp. Rules & Regs 391-3-6-.03 (3)(r); *see also* O.C.G.A. § 12-5-22(13).

265. Rule 391-3-6-.03 (5)(d) of the Georgia Water Quality Standards addresses “Turbidity” and requires that “[a]ll waters shall be free from turbidity which results in a substantial visual contrast in a water body due to man-made activity.”

266. There is “turbidity” in the ditches, stormwater ponds, drainage systems, wells, drinking water supply, surface and subsurface water on and underlying Plaintiffs’ properties that is in “substantial visual contrast” to the condition of those waters prior to Defendants’ commencement of their clearing, deforestation, blasting, excavation, grading, land disturbing, hydro-excavation, development, and operation of the Meta Stanton Springs Data Center. These activities conducted by Defendants are man-made activities.

267. Defendants have caused the turbidity that afflicts waters of the state flowing onto the Morris Property during rain events, and the turbidity that is polluting the wells and surface and subsurface waters supplying those wells on the Morris Property, Wilson Property, Clack Property, and Ziegler Property, which interferes with Plaintiffs’ full use and enjoyment of their properties. Such conditions are continuing.

268. Defendants’ actions violated the Georgia Water Quality Control Act, O.C.G.A. § 12-5-20, et seq., and the regulations enacted pursuant to the foregoing, including the Georgia Water Quality Standards and criteria for All Waters.

269. Defendants’ activities have caused turbidity, discoloration of the water, release, mobilization, migration, and discharge of sediment, silt, fines and particles onto Plaintiffs’ properties, which interfere with Plaintiffs’ full enjoyment and use of their property. Such

turbidity and discoloration of water is present in the well water supplying each Plaintiffs' properties as a result of Defendants' activities.

270. Defendants have caused the turbidity of ponds and drainage systems on the Morris Property from stormwater discharges, site selection, deforestation, land clearing, blasting, excavation, grading and other land disturbing activities, construction, hydro-vac excavation, development and improper and inadequate BMPs at and adjacent to the Meta Stanton Springs Data Center site which has resulted in substantial visual contrast in the water body due to man-made activity as detailed herein.

271. Defendants' actions are violating the Georgia Erosion & Sedimentation Act, O.C.G.A. § 12-7-1, *et seq.*, and the regulations enacted pursuant to the foregoing.

272. The State of Georgia finds "soil erosion and sediment deposition onto lands and into waters" occur because of "widespread failure to apply proper soil erosion and sedimentation control practices in land clearing, soil movement, and construction activities," resulting in pollution of state waters and causing damage to domestic, agricultural, recreational, fish and wildlife, and other resource uses. *See* O.C.G.A. § 12-7-2.

273. To remedy this finding, the policy of this State is to implement stronger erosion and sediment control activities and programs and "to provide for the establishment and implementation of a state-wide comprehensive soil erosion and sediment control program to conserve and protect the land, water, air, and other resources of this state." *See* O.C.G.A. § 12-7-2.

274. Defendants engaged in "land-disturbing activity" in the planning, development, and construction of Meta Stanton Springs Data Center. Specifically, Defendants engaged in soil excavation, heavy equipment operations, hydro-excavation trenching, grading, blasting,

deforestation, and other activities at the West Campus and the East Campus and related areas that resulted in “soil erosion from water or wind and the movement of sediments into state water or onto lands within the [S]tate[.]” See O.C.G.A. § 12–7–3(9).

275. “State waters” includes all rivers, streams, creeks, branches, lakes, reservoirs, ponds, drainage systems, springs, wells, and other bodies of surface or subsurface water, natural or artificial, not otherwise confined or retained completely on a property of a single individual, partnership or corporation. O.C.G.A. § 12–7–3(16).

276. The surface waters, ponds, drainage systems and other bodies of water on the Morris Property and the wells and other bodies of subsurface water on all Plaintiffs’ properties are not otherwise confined or retained completely on their properties, respectively, and are state waters under O.C.G.A. § 12–7–3(16), and Rule 391-3-6-.03 (3)(r).

277. The harm and damages sustained by Plaintiffs are the type of harm these statutes and regulations were designed to protect against, and Plaintiffs fall within the class of persons these statutes and regulations are intended to protect.

278. Through violations of these statutes and regulations, Defendants breached duties owed to Plaintiffs.

279. Defendants’ failure to comply with applicable statutes and regulations constitutes negligence *per se*.

280. Upon information and belief, Defendants violated these statutes and regulations by, among other things: (a) failing to obtain or comply with required land disturbance permits for the scale and scope of their land-disturbing activities; (b) failing to prepare, implement, and maintain adequate erosion and sedimentation control plans as required for land-disturbing activities; (c) failing to install, inspect, and maintain best management practices sufficient to

prevent offsite transport of sediment into state waters, including Plaintiffs' wells and surface waters; (d) failing to comply with NPDES stormwater permit requirements for construction activities; and (e) causing turbidity in state waters resulting in substantial visual contrast due to man-made activity in violation of Rule 391-3-6-.03(5)(d).

281. Defendants' violations of these statutes and regulations directly caused the type of harm the statutes were designed to prevent — namely, soil erosion, sediment deposition onto neighboring lands and into state waters, pollution of groundwater, and degradation of water quality relied upon by Plaintiffs for domestic use.

282. Plaintiffs' damages are the natural and foreseeable result of Defendants' failure to comply with erosion, sedimentation, and water quality control requirements.

283. Defendants' failures, actions, and/or omissions at the Meta Stanton Springs Data Center are a cause in fact and a proximate cause of Plaintiffs' damages in amounts to be proven at trial.

284. As a result of Defendants' negligence *per se*, Plaintiffs have suffered property damages.

285. As a result of Defendants' foregoing acts and omissions, Plaintiffs have incurred special damages, including diminution of value and the cost of restoration and repair of Plaintiffs' properties. The damage to Plaintiffs' properties is ongoing. Accordingly, Plaintiffs' total special damages are in an amount to be proven at trial.

286. Plaintiffs are further entitled to be compensated for damages and their hurt, annoyance, inconvenience, and loss of use and enjoyment of their properties resulting from Defendants' actions as alleged herein in an amount to be determined by the enlightened conscience of the jury.

**COUNT VI - TAKING AND INVERSE CONDEMNATION
(DEVELOPMENT AUTHORITY)**

287. Plaintiffs adopt and incorporate by reference all the preceding factual allegations as if fully restated verbatim herein.

288. “[P]rivate property may not be taken or damaged for public purposes without just and adequate compensation being first paid.” GA. CONST. art. I, § III, ¶ I(a).

289. The Fifth Amendment of the U.S. Constitution, as applied to the states through the Fourteenth Amendment, prohibits the taking of private property for a public purpose without payment of “just compensation.” U.S. CONST. amend. V.

290. The Development Authority has taken and damaged Plaintiffs’ private properties for a public purpose within the meaning of the Constitution of the State of Georgia and the U.S. Constitution.

291. The Development Authority’s actions in authorizing, facilitating, and benefiting from the Meta Stanton Springs Data Center development served a public purpose within the meaning of the Georgia Constitution and the U.S. Constitution. The Development Authority issued taxable revenue bonds, structured PILOT payments to fund county services, in pursuit of its self-stated governmental objective to “create an industrial area to attract industry to the region.” The economic development purpose served by the Development Authority’s conduct is a public purpose, and the resulting damage to Plaintiffs’ properties constitutes a taking for which just compensation is required.

292. The Development Authority’s government-authorized and government-directed activities have resulted in an ongoing physical invasion of Plaintiffs’ properties by sediment, silt, polluted groundwater, unreasonable noise, and light intrusion. These entail a continuing physical occupation that constitutes a per se taking. The intrusion of these substances and emissions onto

Plaintiffs' properties was the direct and inevitable consequence of the Development Authority's decision to authorize hyperscale data center development on this site, at this scale and pace, without adequate controls to prevent offsite impacts on neighboring residential properties and their groundwater supplies.

293. As of the undersigned date, the Development Authority has not paid or tendered to Plaintiffs any amount of compensation for the taking and damaging, as required by the Constitution of the State of Georgia and the U.S. Constitution.

294. Because the Development Authority has taken and damaged Plaintiffs' private properties for a public purpose within the meaning of the Constitution of the State of Georgia and the U.S. Constitution, Plaintiffs are entitled to payment of just and adequate compensation and consequential damages from the Development Authority.

295. Moreover, the Development Authority's tortious and unreasonable conduct created and maintained a continuing abatable nuisance and trespass, namely the unauthorized intrusion of sediment, silt, noise, light, and other discharges, and migration of pollutants onto Plaintiffs' private properties, without payment of just compensation constitutes an inverse condemnation of Plaintiffs' private properties.

296. Despite having knowledge of same, the Development Authority failed to remedy the continuing and abatable nuisance and trespass on Plaintiffs' private properties within a reasonable time.

297. Through its inverse condemnation, the Development Authority has taken and damaged Plaintiffs' private properties for a public purpose within the meaning of the Constitution of the State of Georgia and the U.S. Constitution.

298. Through its inverse condemnation, the Development Authority has not paid or tendered to Plaintiffs any amount of compensation for the taking and damaging, as required by the Constitution of the State of Georgia and the U.S. Constitution.

299. Because, and through its inverse condemnation, the Development Authority has taken and damaged Plaintiffs' private properties for a public purpose within the meaning of the Constitution of the State of Georgia and the U.S. Constitution, Plaintiffs are entitled to payment of just and adequate compensation and consequential damages from the Development Authority.

COUNT VII - ATTORNEY'S FEES AND EXPENSES (ALL DEFENDANTS)

300. Plaintiffs adopt and incorporate by reference all the preceding factual allegations as if fully restated verbatim herein.

301. At the latest, Meta Defendants received notice of the conditions of contamination, nuisance, trespass, and other harms detailed herein, and their responsibility for causing these conditions as of December 2025. (Exhibit A).

302. At the latest, Holder, Plateau Excavation, and Development Authority received notice of the conditions of contamination, nuisance, trespass, and other harms detailed herein, and their responsibility for causing these conditions as of January 2026 and March 2026. (Exhibit B, Exhibit C)

303. Despite receipt of these notices, Defendants have not abated or remedied these conditions.

304. Defendants' conduct in continuing to allow these conditions to damage Plaintiffs' property and interfere with their use and enjoyment of their properties, despite receipt of notice of these conditions, is intentional.

305. Pursuant to O.C.G.A. § 13–6–11, Defendants have acted in bad faith and have caused Plaintiffs unnecessary trouble and expense, for which Plaintiffs are entitled to recover their expenses of litigation, including reasonable attorney’s fees and expenses, from Defendants.

306. Because Defendants have failed and refused to abate the unlawful conditions on Plaintiffs’ properties, Plaintiffs are forced to incur attorney’s fees and expenses in an effort to resolve this matter and obtain relief for the harms inflicted on them by Defendants. Plaintiffs are forced to incur additional attorney’s fees and expenses unless and until Defendants cease and abate their unlawful and illegal use, occupation, and possession of Plaintiffs’ properties.

307. Defendants’ bad faith is demonstrated by Meta Defendants’ refusal to respond to Plaintiffs’ December 2025 demand; by Development Authority’s blanket denial of all liability without undertaking necessary investigation, ordering or requiring Meta Defendants to remediate and cure the harms inflicted on Plaintiffs, or undertaking any remedial action of its own; by Construction Defendants’ substantive silence in response to Plaintiffs’ January 2026 demand; and by all Defendants’ continuing the harmful activities and refusing to implement any remedial or abatement measures despite actual knowledge of the ongoing damage to Plaintiffs’ properties and wells.

**COUNT VIII - PUNITIVE DAMAGES
(META DEFENDANTS, HOLDER, PLATEAU EXCAVATION)**

308. Plaintiffs adopt and incorporate by reference all the preceding factual allegations as if fully restated verbatim herein.

309. Before doing any deforestation, explosives blasting, land clearing, grading, hydro-excavation, or other construction activity, and before continual operation of the Stanton Springs Data Center, Meta Defendants, Holder and Plateau Excavation knew that the damage that has been caused to Plaintiffs properties would result from these activities.

310. Before doing any deforestation, explosives blasting, land clearing, grading, hydro-excavation, or other construction activity, Meta Defendants, Holder and Plateau Excavation knew that the West Campus site was previously forested, in a rural area featuring residential homes relying on self-supplied groundwater wells, and that the West Campus site was located within approximately 1 mile or less from the western edge of a Most Significant Ground-Water Recharge Area where many such landowners live, including Plaintiffs.

311. Before siting and expansion eastward toward where the East Campus now sits, followed by mass deforestation, explosives blasting (at least as of March 29, 2024), land clearing, grading, hydro-excavation, or other construction activity, Meta Defendants, Holder and Plateau Excavation knew that the majority of the entire East Campus footprint was located atop a Most Significant Ground-Water Recharge Area, as mapped by the Georgia Geologic Survey in Hydrologic Atlas 18, a publication dated 1989 and reprinted in 1992, a designation of “those regions likely to have the greatest vulnerability to pollution of ground water from the surface and near surface activities of man.” These Defendants went forward anyway.

312. These Defendants intended the results that were foreseeable to these Defendants.

313. What is foreseeable can be avoided; refusing to avoid the foreseeable makes the conduct intentional.

314. During the development of their grading, excavation, earth-moving, land disturbing, site development and construction project, these Defendants had knowledge that their activities were causing hurt, annoyance, inconvenience and harms to neighboring properties, as they were in receipt of complaints and requests for assistance from Plaintiff Beverly Morris at various points in time during these activities.

315. Prior to initiating this action, Plaintiffs through their counsel notified Defendants of their concerns in detail.

316. Defendants, having knowledge of these problems, and the harms their actions have caused, refused to engage in actions that would prevent the harms detailed herein from continuing, or remedy the harms already sustained by the Plaintiffs.

317. Meta Defendants, Holder, and Plateau Excavation have engaged in conduct that is wanton and reckless, and manifests a conscious indifference to the damaging consequences of their actions, and failures to act.

318. Pursuant to O.C.G.A. § 51-12-5.1(b), Plaintiffs will prove by clear and convincing evidence that Defendants' actions showed willful misconduct, malice, wantonness, and conscious indifference to consequences. Defendants had actual knowledge from the 2018 Soil Survey Report, the Georgia Geologic Survey's Most Significant Ground-Water Recharge Area designation, pre-blast surveys and planning documents, and direct complaints and pleas for help from Plaintiff Beverly Morris that their activities were causing and would continue to cause harm to Plaintiffs' properties and wells, yet deliberately chose to continue operations without implementing adequate safeguards or remediation measures.

319. The conduct of these Defendants as described above warrants and demands the imposition of punitive damages against them pursuant to O.C.G.A. § 51-12-5.1 in an amount to be determined at trial, sufficient to deter, penalize, or punish Meta Defendants, Holder, and Plateau Excavation from such harmful behavior in the future.

320. Because these Defendants have acted, or failed to act, with the specific intent to cause harm, a punitive damage award in this case is not limited to a maximum of \$250,000.

COUNT IX - INJUNCTIVE RELIEF
(ALL DEFENDANTS)

321. Plaintiffs adopt and incorporate by reference all the preceding factual allegations as if fully restated verbatim herein.

322. Defendants' activities have created a continuing, abatable trespass and nuisance from which Plaintiffs and their properties, including their wells, drinking water, water supply lines, interior plumbing, fixtures, appliances, and reasonable use and enjoyment of their properties, will suffer irreparable injury and for which Plaintiffs have no adequate remedy at law.

323. Monetary damages alone are inadequate to compensate Plaintiffs because the contamination of their aquifer and wells is progressive and cumulative, the full extent of future harm is not yet ascertainable, and absent injunctive relief, Plaintiffs would be required to bring successive lawsuits for each new manifestation of damage caused by Defendants' continuing tortious conduct.

324. The Morris Plaintiffs are subjected to an onslaught of intrusive light into their home each evening, and a continual disruption of their lives from which they cannot escape, given the location of their home in proximity to the colossal, perpetually operating Meta Stanton Springs Data Center that is still being developed a short distance away from their home.

325. The Wilson Plaintiffs, together with the Morris Plaintiffs, must endure perpetually inconsistent water pressure, silt-contaminated drinking water, frequently malfunctioning water appliances, and other harms from which they cannot escape, given they are experiencing these conditions while living in their homes.

326. The Clack Plaintiffs suffer from silt and sediment in their groundwater well, intrusion of silt, sediment and fines into their interior plumbing, light intrusion in the evenings, and the regular intrusion of noise from the East Campus into their homes and on their property.

327. The Ziegler Plaintiffs suffer from silt and sediment in their groundwater well, intrusion of silt, sediment and fines into their interior plumbing, home water filter, and the material reduction of flow to their surface water creek from the Meta Stanton Springs Data Center.

328. Plaintiffs are entitled under this Court's powers of equity to a permanent injunction ordering Defendants to cease all discharges, migration, entry and invasion of their properties, wells and homes by muddy water, silt, sediment, fines, clays and pollutants from the Meta Stanton Springs Data Center, and an injunction ordering Defendants to cease all encroachments of unreasonable light pollution, noise, and unreasonable air emissions from the Stanton Springs data center site onto Plaintiffs' properties.

329. The balance of equities favors injunctive relief. Commercially reasonable and technically feasible measures exist to abate the continuing nuisance and trespass, including but not limited to installation and maintenance of proper erosion and sedimentation controls, stormwater management infrastructure, and perimeter containment measures, light controls and directional lighting modifications, sound barriers and operational noise controls, and groundwater monitoring and remediation systems.

330. Defendants possess the financial resources and technical capacity to implement these measures without ceasing operations entirely.

331. The public interest is served by protecting groundwater resources within a designated Most Significant Ground-Water Recharge Area and preserving the residential property rights of neighboring landowners from continuing pollution, including turbidity of surface water and groundwater, manifested in wells on Plaintiffs' properties.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for the following relief against Defendants:

- a. Award Plaintiffs damages in an amount to be determined by a jury sufficient to compensate them for damages to real property, out of pocket expenses, and future expenses;
- b. Award Plaintiffs general damages in an amount determined by the fair and enlightened conscience of the jury;
- c. Award Plaintiffs punitive damages as the jury concludes are sufficient to deter Meta Defendants, Holder Construction, and Plateau Excavation, Inc. from the kind of wrongdoing described herein, including punitive damages in excess of \$250,000;
- d. Award Plaintiffs attorney's fees, costs and expenses incurred in connection with the litigation of this matter as to all Defendants;
- e. Enjoin Defendants, jointly and severally, from maintaining the nuisance and trespass they have caused, created, and maintained;
- f. Enjoin Defendants, jointly and severally, requiring them to remove the silt and sediment from the Plaintiffs' properties, wells, interior water pipes, fixtures, and infrastructure;
- g. That Plaintiffs have and recover from Defendants all damages compensable under Georgia law;
- h. That Plaintiffs have and recover damages from the Defendants for Plaintiffs' loss of use and enjoyment of their properties, in such amounts as the jury concludes are appropriate;
- i. Equitable relief in the form of abatement of the sediment, silt, noise, light, and other discharges, intrusion, and migration of pollutants on Plaintiffs' properties;
- j. Award costs of restoration sufficient to bring state waters, including ground waters and surface waters on Plaintiffs' properties into compliance with the Georgia Water Quality Control Act and Georgia Water Quality Standards, and compliance with the Georgia Erosion & Sedimentation Act, O.C.G.A. § 12-7-1, *et seq.*;

- k. Trial by jury with respect to all issues triable to a jury;
- l. Interest on the judgment at the maximum rate allowed by law; and
- m. Such other and further relief as the Court deems equitable, just and proper.

Respectfully submitted, this 31st day of August 2026.

/s/ Christopher J. Bowers

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EVANS BOWERS

729 Piedmont Ave NE
Atlanta, GA 30308
(404) 850-6750 (phone)
Counsel for Plaintiffs

EXHIBIT A

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

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1. Article Addressed to:

Baymare LLC
c/o Corporation Service Company
2 Sun Court, Suite 400
Peachtree Corners, GA 30092



9590 9402 9307 4295 6640 09

2. Article Number (Transfer from service label)

9589 0710 5270 3788 9569 86

PS Form 3811, July 2020 PSN 7530-02-000-9053

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A. Signature

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☐ Agent

☐ Addressee

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C. Date of Delivery

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Domestic Return Receipt

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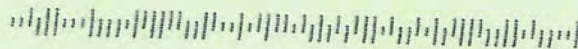
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1. Article Addressed to:

Meta Platforms, Inc.
c/o Corporation Service Company
2 Sun Court, Suite 400
Peachtree Corners, GA 30092



9590 9402 9310 4295 7870 85

2. Article Number (Transfer from service label)

9589 0710 5270 3788 9569 62

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3. Service Type

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Mail Restricted Delivery

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Morning Hornet LLC
c/o Corporation Service Company
2 Sun Court, Suite 400
Peachtree Corners, GA 30092



9590 9402 9310 4295 7873 13

2. Article Number (Transfer from service label)

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- ☐ Addressee

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J. D. M. R.

C. Date of Delivery

12/19/20

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- ☐ No

3. Service Type

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- ☐ Adult Signature Restricted Delivery
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- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
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- ☐ Priority Mail Express®
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ATLANTA GA RPDC 302



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1. Article Addressed to:

Meta Stanton Springs
Building 1
100 Move Fast Way
Social Circle, Georgia 30025



9590 9402 7643 2122 7444 31

2. Article Number (Transfer from service label)

9589 0710 5270 3788 9569 93

COMPLETE THIS SECTION ON DELIVERY

A. Signature

☒ *Rachel Holloway* ☐ Agent ☒ Addressee

B. Received by (Printed Name)

C. Date of Delivery

10/22/25

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☒ No

3. Service Type

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| ☐ Certified Mail® | ☐ Registered Mail Restricted Delivery |
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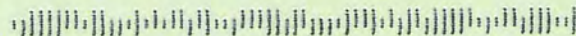
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729 PIEDMONT AVE, NE | ATLANTA, GA 30308

CB

0-143529



Evans | Bowers

CHRISTOPHER J. BOWERS
DIRECT DIAL: 404.850.6747
E-MAIL: cbowers@evansbowers.com

December 16, 2025

Via Certified Mail

9589 0710 5270 3788 9569 62

Meta Platforms, Inc.

c/o Corporation Service Company
2 Sun Court, Suite 400
Peachtree Corners, GA 30092

Via Certified Mail

9589 0710 5270 3788 9569 86

Baymare LLC

c/o Corporation Service Company
2 Sun Court, Suite 400
Peachtree Corners, GA 30092

Via Certified Mail

9589 0710 5270 3788 9569 79

Morning Hornet LLC

c/o Corporation Service Company
2 Sun Court, Suite 400
Peachtree Corners, GA 30092

Via Certified Mail

9589 0710 5270 3788 9569 93

Meta Stanton Springs

Building 1
100 Move Fast Way
Social Circle, Georgia 30025

RE: **Demand to Abate Continuing Nuisance and Trespass to Property of Beverly and Jeff Morris, Chris and Lindsay Wilson in Morgan County, Georgia**

Meta Stanton Springs Data Center

Meta, Morning Hornet and Baymare (collectively, "Meta"):

This firm has been retained by Beverly and Phillip J. (Jeff) Morris, and Chris and Lindsay Wilson regarding past and ongoing damage to their real property caused by your development, ownership and operation of a rural, hyperscale data center complex across the street from their homes.

This letter is a good faith attempt to promptly find a solution that will cease your past and ongoing interference with the Morris' and Wilson's use and enjoyment of their property, and remedy the harms they have sustained as a result of your unreasonable development and operation of the Stanton Springs Data Center in Social Circle Georgia (formerly known as the Newton Data Center). The Morris' and the Wilsons have sustained damages from silt and sedimentation in their water supplies and sediment intrusion, premature failure of home appliances, loss of reasonable use of water fixtures and plumbing and clogged pipes and water lines, disruption of electrical power, excessive noise and vibration, light pollution, and other harms and losses from your land disturbing, development, ownership and operation of the Stanton Springs Data Center.

We understand that each of the addressees of this letter have had and may continue to have involvement with the development of the Meta Stanton Springs Data Center site so as to be in position to abate the pollution and ongoing harms set forth in this letter. It is their sincere hope that Meta will decide to engage in a good faith, in-person discussion to arrive at a prompt, permanent resolution that will end the harms imposed on them by the Stanton Springs Data Center, in the hopes of avoiding unnecessary litigation. Nevertheless, to preserve their interests, this letter places Meta on formal notice of their claim and demand for abatement of nuisance pursuant to O.C.G.A. § 41-1-1 *et seq.* as well as trespass and interference with enjoyment and use of their property pursuant to O.C.G.A. § 51-9-1. The Morris and Wilsons likewise reserve the right to pursue relief against you and others who are liable for their losses and damages for nuisance and trespass, as well as damages arising under negligence, negligence per se for violations of the Georgia Erosion & Sedimentation Act and Georgia Water Quality Control Act, strict liability for ultrahazardous activity, and other theories, including injunctive and other equitable relief, as well as punitive damages.

The facts set forth herein are based on information presently available and reflect reasonable investigation conducted to date. This demand is made without waiver of rights, and all factual statements are necessarily subject to revision or supplementation as additional documents, data or disclosures become available.

I. The Properties Harmed by the Stanton Springs Data Center

Beverly and Jeff Morris own a home on approximately 6.4 acres at 1121 Sewell Lane, Mansfield GA 30055, Morgan County Parcel No. 014 032 (“Morris Property”) (See [Figure 1](#), next page). Chris and Lindsay Wilson own a home on about 10 acres at 1201 Sewell Lane, Mansfield Georgia 30055, Parcel No. 014 035 (“Wilson Property”) ([Figure 1](#)). Both the Morris Property and the Wilson Property are zoned R4-Residential.

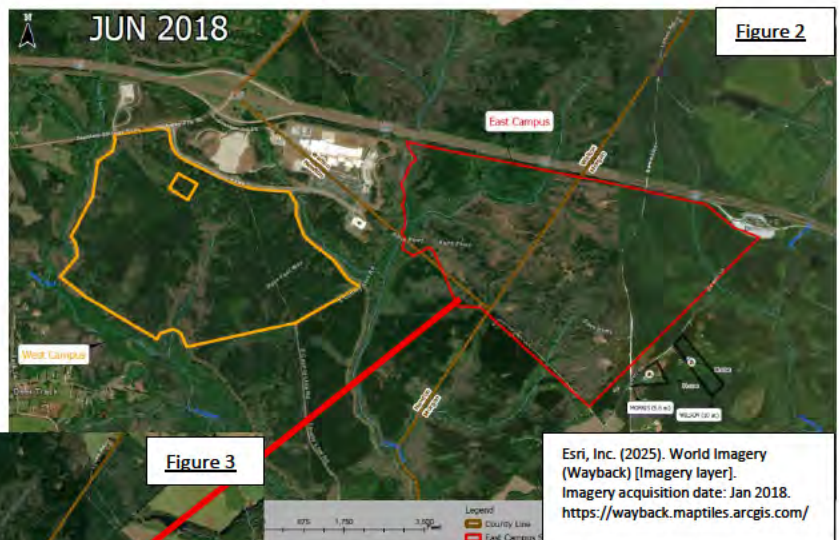
The “Meta Stanton Springs Data Center” refers to a colossal complex of buildings and supporting infrastructure spread across two campuses collectively occupying portions of *three* Georgia counties – Walton, Newton, and Morgan. ([Figure 1](#), below).

[See next page]



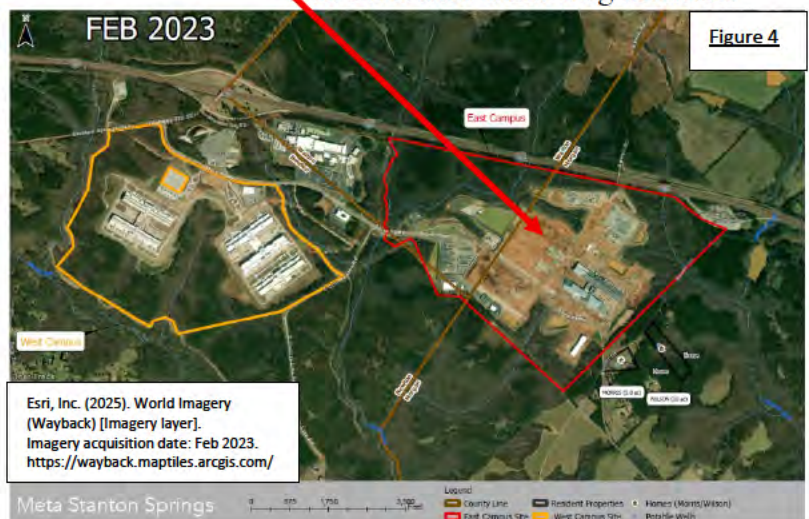
The “**West Campus**” occupies about 416 acres within Walton County, parcel No. 01340005, also owned by the JDA. As its name suggests, the West Campus sits further to the west of the East Campus. Collectively, the Stanton Springs Data Center was developed by Baymare LLC (“Baymare”) and Morning Hornet LLC (“Morning Hornet”), and is run by Meta Platforms, Inc. (“Meta”).

The project broke ground in 2018. Figures 2 through 5 illustrate the transformation of the neighborhood relative to where the Morris and Wilson families live.¹ What was once a refuge in nature selected by the Morrises and Wilsons for its seclusion and tranquility in 2016 (Morris), and in 2020 (Wilson) resembles nothing like it did when these families purchased their homes.



By late 2020, both families observed rapid deforestation across immense swathes of land west of their properties, eventually leaving bare red clay earth where a forest once stood. Site development included large-scale grading to prepare a foundation for multiple building pads, subsurface excavation, trenching and other land disturbing activities

This land clearing, grading, excavation, and industrial scale earthmoving operation lasted for well over a year, given the size of the East Campus.



¹ Full page Figures 1 through 5 are appended to this letter.

Today, the East Campus houses thousands of computer servers, cooling infrastructure including surface water ponds, fans, and electrical power generators, and fiber-optic infrastructure supporting “cloud” based computing operations.

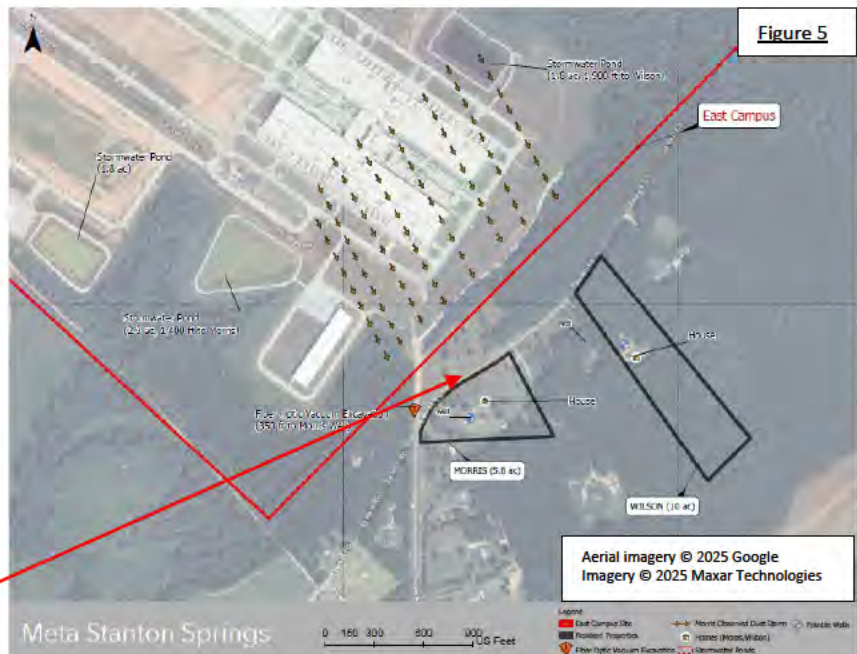
To connect these computer systems to the network, you engaged contractors to excavate trenches and perform related work to install underground fiber optic conduits, including work performed in proximity to the eastern edge of the East Campus, which is bordered by **Sewell Lane**. The Morris Property and the Wilson Property lie at the other side of Sewell Lane from the East Campus.

The scale of your land disturbing and construction activity involved years-long, nearly daily operation of heavy equipment at various stages and in various proximity to the Wilson and Morris homes, including vacuum excavation (“hydrovac” or “vac-ex”) and trenching, and sustained site work to construct the multi-structure industrial park where the East Campus now sits. In at least one instance, your development work included explosives blasting to prepare portions of the Stanton Springs Data Center site, in a location believed to be approximately 1.1 miles from the Morris Property (see [Figure 1](#) above).

The cumulative effect of these operations is substantial disturbance of soil, overburden, and shallow groundwater flow paths that are continuing to adversely affect the Wilsons and Morrisises, whose homes are located just across the street from the massive East Campus site. In every sense of the term, Stanton Springs and the Morrisises and Wilsons are neighbors. As detailed in this letter, under any reasonable interpretation of the term, Meta has been anything *but* a good one.

II. Summary of Harms

The following non-exhaustive summary of harms flow directly from Meta's transformation of a once-forested, quiet rural-residential area into a continual nightmare for the Morries and Wilsons. In sum, Meta's mass clearing, excavation, regrading, blasting, and high-intensity operations triggered a cascade of adverse impacts that haunt them to this day: contaminated wells, sediment migration, intrusive noise and light, dust, wildlife displacement,



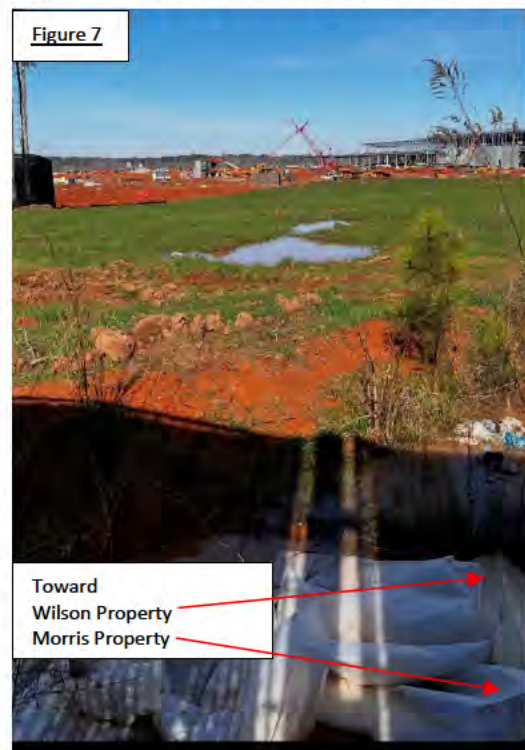
and loss/degradation of basic residential functions such as reliable electricity and home appliances and fixtures that malfunction and fail.

These harms are not trivial or fanciful; they are highly intrusive, substantially degrading daily life. These conditions did not exist before Meta's development began across the street.

A. Surface-Water Runoff/Contamination

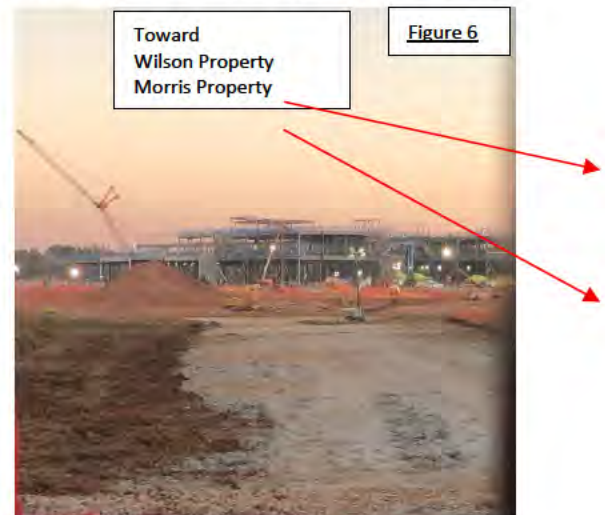
Adjacent to the Morris and Wilson homes, Meta transformed what was once a heavily forested landscape (e.g. [Figure 2](#) above, 2018) into a massive industrial zone on the other side of the street (e.g. [Figures 1, 3-4](#) above). More than 470 acres (roughly equivalent to 350 football fields) were stripped of vegetation, and over 4 million cubic yards of soil were graded, excavated, and reshaped—along with roughly 155,000 cubic yards of bedrock blasted—to build the East and West Campus facilities. The scope of these activities was unprecedented at the time in this rural-residential setting: entire ridgelines were removed, red-clay soils were exposed, and the natural drainage patterns that had existed for generations were fundamentally altered.

Meta's mass clearing and grading exposed wide expanses of red clay directly upslope of the Morris and



Wilson homes (e.g., [Figures 3-4](#) above). Without the forest canopy and root systems that once stabilized these soils,

Meta's mass grading left large areas of loose, exposed red clay highly susceptible to erosion and rainfall.



To install fiber optic cables underground to connect the East Campus data center to the cloud, you and your contractors performed hydro-excavation (or Vacuum excavation) trenching, and possibly horizontal drilling, along the corridor from the East Campus toward Sewell Lane across the intersection from the



Morris Property, further uncovering and destabilizing these soils (See [Figure 8](#) below, Vacuum excavation May 23, 2023 and nearby pollution impacts).

- East Campus
- Hydrovac trenching zone
- Morris well water



In performing this work, you created additional pathways for sediment to mobilize downslope in the direction of the Morris and Wilson properties. The effects are significant and ongoing. As shown in [Figure 8](#), stormwater runoff now carries sediment from both the graded areas and these trenching operations into roadside ditches and swales, continuing onto the Morris Property.

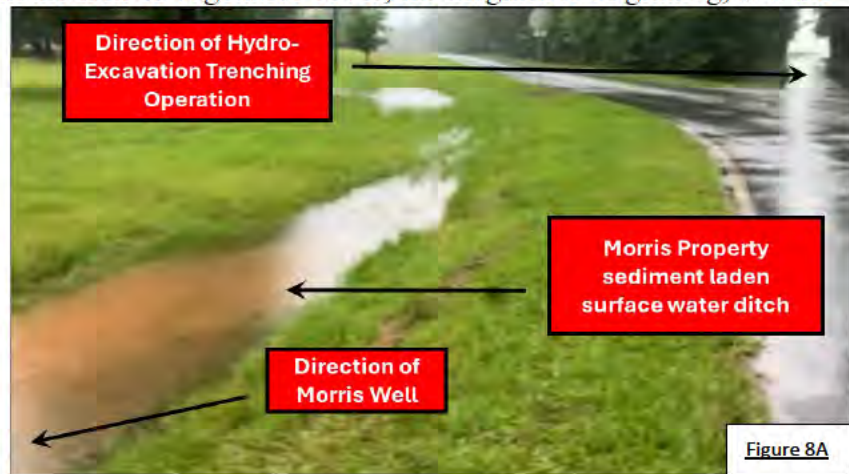
These runoff patterns emerged only after this land disturbing work took place and remain to this day. Red-clay sediment matching the exposed soils on Meta's site (e.g. [Figures 3-7](#) above) now accumulates in the roadside ditch on the Morris Property along Sewell Lane, moving downslope toward the Wilson Property during large rain events. As shown in [Figure 8](#) (Vacuum excavation May 23, 2023) and resulting impacts May 29, 2025 and November 9, 2025, this sediment pools during rain events, collects in drainage swales, and discharges across the



intersection (including through a corrugated pipe) to and alongside Sewell Lane, precisely along the downgradient path from the East Campus toward the Morris and Wilson homes and their onsite wells. As shown on Figure 8 above and Figures 8A and 8B below, these sediment-laden ditches are upgradient to and a short distance from the Morris' groundwater well.

This surface sediment runoff is not an isolated occurrence. It is now a recurring condition caused by inadequate and unreasonable construction and land disturbing activity over which you have control in the planning, development, and continual operation and maintenance of Stanton Springs, and it is consistent with the lack of vegetative cover, the magnitude of grading, and the insufficient containment of disturbed soils on your site.

As shown herein, the Morris' experienced and continue to experience sediment deposits on their land after significant rainstorms, as well as visible sediment contamination in ditch flow, with progressive buildup of sediment fines in drainage areas that had previously remained clear.



The source of the Morris and Wilson well contamination is obvious: Meta's land disturbance on and from the East Campus exposed vast areas of erodible soil; precipitation and stormwater has



mobilized that sediment, and the downstream drainage path now carries it directly toward the Morris and Wilson properties.

B. Well Damage and Groundwater Contamination

These surface disturbances are only part of the story; Meta's land disturbing, construction and ongoing operation at Stanton Springs has materially altered the subsurface features and characteristics that supply these families' drinking water, harming them. Because the Morris'

and Wilsons rely exclusively on well water, it is foreseeable that improper land disturbing activity on your site across the street would directly impact them and their water supplies – which is precisely what is happening.

Before Meta started its significant deforestation of the East Campus site, the Morris and Wilsons relied on stable, trouble-free water supplied by groundwater wells. Their water was clear, water pressure was consistent, and they had no issues with sediment infiltration. The Morris engaged a certified home inspector prior to purchasing their home in 2016 as part of their purchase due diligence, documenting no plumbing, fixture, well or drinking-water problems.

Similarly, in July 2020, the Wilsons engaged a certified home inspector, documenting the onsite well conditions as having no issues with respect to sediment or siltation. Figure 9 is the Wilson's whole home water filter drawn from their well, as of their July 2020 Home Inspection report, prior to Meta's mass-land disturbing activity at the East Campus. Figure 11 below is the *same* filter on December 8, 2025, clogged with sediment overwhelming their groundwater well from the East Campus site. The filter had been replaced just a month prior (Figure 10).



Figure 9 (Wilson water filter, July 29, 2020)



Figure 10 (Wilson water filter being replaced Nov. 9, 2025)



Figure 11 (Wilson water filter, December 8, 2025)

Water quality from both the Wilson and Morris wells changed only when Meta began large-scale construction across the street in late 2020, disturbing the recharge soils and shallow fractured-rock aquifer that supplies these homes.

Well contamination began only *after* your land disturbing work.

Meta's soil excavation, heavy equipment operations, hydro-excavation trenching, grading, blasting and other activities and failures to act occurred near the Morris and Wilson properties—well within the zone influencing the shallow aquifer that provides their drinking water. Shortly after these operations began to significantly disturb soils in late 2020, both families experienced signs of groundwater degradation and resulting harms, including:

- Sediment-laden, cloudy, reddish well water
- Rapid degradation of the Wilson's home water filter, requiring unreasonably frequent filter changes that have failed to eliminate sediment intrusion in the home's water supply
- Clogged pipes, water supply lines and fixture failures due to sediment build up
- Malfunction and premature failure of water-dependent appliances; the Morris Family has replaced their washing machine *multiple* times since 2021, they have had to borrow money to deal with the incessant plumbing, fixture and appliance repair and maintenance costs caused by sediment intrusion; the Wilsons recently replaced their refrigerator with its built in water tap, with their washing machine constantly malfunctioning and barely hanging on
- Inability to operate more than one bathroom at a time due to lack of water pressure, and reduced or impaired function of cold water drawn directly from their wells

These and other harmful conditions were absent before Meta's construction of the Staton Springs Data Center. The Morris Family lived on their property for several years without incident from 2016 until your land-clearing work at the East Campus in late 2020. As for the Wilsons—they had just recently moved to their “dream” home in a secluded, wooded property in a quiet country atmosphere only months prior to commencement of your significant land disturbing activity.

The onset of these families' well contamination and the cascade of harms that followed mirrors the timing of deforestation, excavation, trenching, grading, blasting and construction activities at the Stanton Springs Data Center. In comparison, this timeline is inconsistent with seasonal groundwater/weather variability or natural fluctuations in groundwater levels, and is likewise inconsistent the effects of ordinary maintenance issues that all homeowners might encounter. Both families have incurred significant trouble and expense in their increasingly desperate respective bids to maintain basic household functions that involve clean, running water. The timeline of harms detailed above, experienced almost simultaneously by the Morris and Wilson families, is consistent with the introduction and movement of disturbances of nearby

subsurface soils within a shallow aquifer – the very conditions that exist along and beneath Sewell Lane and these families’ homes.

i. Sediment Observed in the Wells is Consistent With Soils from Meta’s Site

The reddish fines and sediment accumulating in these families’ water systems match the color and texture of the exposed red-clay soils on Meta’s construction site. While surface runoff into roadside ditches demonstrates that Meta’s disturbed soils are mobilized and moving downstream, these same fines are moving downgradient in the aquifer and are appearing inside the Morris’ and Wilsons’ wells and household plumbing/water lines — clear indications of subsurface transport of these pollutants from your site, and not merely surface discharges of your sediment (which is visible to the naked eye, as shown in [Figure 6](#), [Figure 7](#), [Figure 8](#), [Figure 8A](#), and [Figure 8B](#) above).

As they draw in water from the aquifer, the Morris and Wilson wells are intercepting large concentrations of Meta’s sediment in groundwater at depth. As their pre-purchase home inspections independently demonstrate in 2016 (Morris) and in 2020 (Wilson), this condition that did not exist until Meta disrupted the aquifer by leveling hundreds of acres, blasting into bedrock, trenching, and constructing its massive industrial site with manifestly improper perimeter containment or site control that would otherwise prevent it from unleashing masses of sediment into the water table, and in stormwater discharges.

ii. Construction-Related Disturbances to the Aquifer

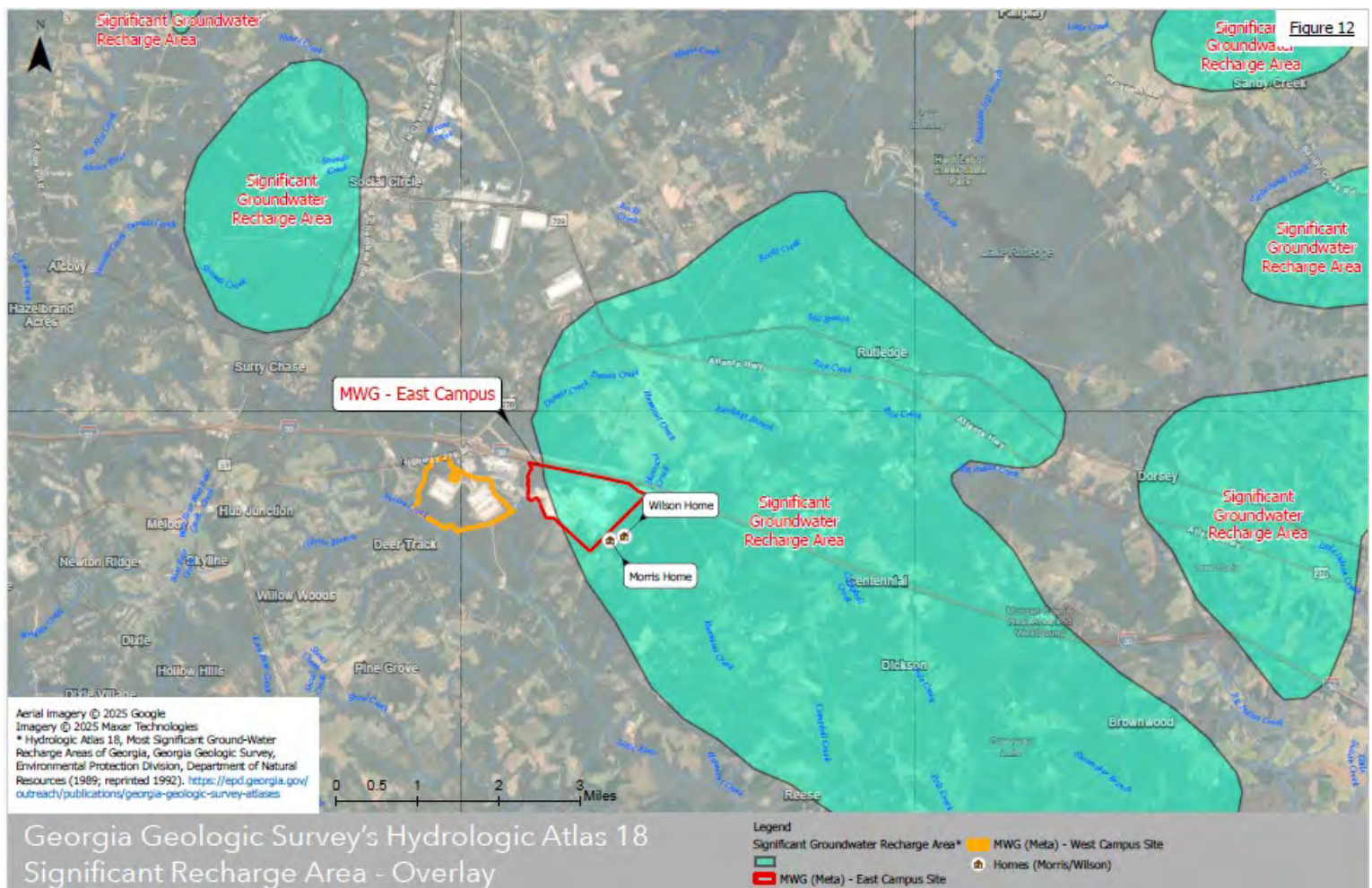
Meta’s deforestation, blasting, grading, deep excavation, heavy equipment loading, and extended hydro-excavation trenching likely created repeated mechanical disturbances to the shallow aquifer system, which explains the harms they have been sustaining for the very timeframe that fits the Stanton Springs development sequence set out above. Rapid deforestation and removal of topsoil to below the previously-existing root structure, excavation and grading increases surface water and rainfall infiltration as well as sediment migration into the aquifer, given that the forest and dense vegetation that once existed there has been erased.

Blasting—removing roughly 155,000 cubic yards of rock and dirt — can open fractures, increase hydraulic connectivity, and mobilize sediment over considerable distances. The level of your blasting to develop Stanton Springs is *substantial*. For context, 155,000 cubic yards of bedrock is equal to roughly 4.2 million cubic feet, or enough to fit a 17-story office tower occupying a 25,000 footprint. That is enough blasted rock and dirt to fit roughly the size of the Candler Building in downtown Atlanta, which is 17-stories high.

Seismic activity at such a scale within little more than a mile from these properties is more than enough to significantly alter the subsurface. Months of vibration from cranes, compactors, loaded trucks, and foundation work could further loosen and mobilize fines and alter subsurface flow paths. These disturbances, taken together, provide a direct and foreseeable mechanism for sediment migration into nearby groundwater wells, such as those on the Morris and Wilson properties.

iii. Recharge-Area Vulnerability of Aquifer

As shown in Figure 12 below (and attached), the East Campus and the Morris and Wilson properties all sit within a “Most Significant Ground-Water Recharge Area” as formally mapped by the Georgia Geologic Survey in Hydrologic Atlas 18.² Such designations are “those regions likely to have the greatest vulnerability to pollution of ground water from the surface and near surface activities of man.”³ In this particular region of Georgia, the shallow aquifer system is replenished primarily through thick, permeable soils that allow rainfall to infiltrate vertically (top down) into the fractured-rock groundwater system supplying these homes. These soils are the aquifer’s protective and functional interface: they regulate infiltration, stabilize fines, and maintain the clarity and reliability of the groundwater entering domestic wells.

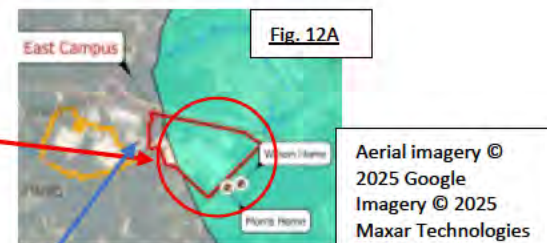


² Hydrologic Atlas 18, Most Significant Ground-Water Recharge Areas of Georgia, Georgia Geologic Survey, Environmental Protection Division, Department of Natural Resources (1989; reprinted 1992). <https://epd.georgia.gov/outreach/publications/georgia-geologic-survey-atlases>

³ See *id.* (“WHAT ARE RECHARGE AREAS?”)

When construction of Meta's East Campus removed the vegetative cover, stripped away soil, blasted bedrock, and opened large areas of disturbed earth, it directly altered the natural recharge process operating in this designated zone, shown in Figure 12 (green). Disturbance of significant-recharge soils can reasonably be expected to increase the downward migration of fine sediment, contribute to turbidity pulses after storms, and alter flow paths into the shallow aquifer. These effects mirror precisely what the Morris and Wilson families are experiencing: red-clay fines in their well water, repeated filter clogging, reduced pressure, and turbidity events following storm activity from your blasting, trenching, excavation/construction and inadequate controls or safeguards.

Figure 12 illustrates this clearly. The **East Campus** footprint and the **Morris** and **Wilson** properties all fall **squarely within** the mapped "Most Significant Ground-Water Recharge Area" (green shaded region, Fig. 12A). In this Georgia-designated significant recharge area, a large-scale land-disturbing project of Meta's magnitude at Stanton Springs does not simply reshape the surface; it destabilizes the very materials through which groundwater enters and moves about the aquifer. Once disturbed, these soils can readily transmit fine sediment downward, and the downgradient wells (Morris and Wilson) become the receivers of that sediment. Now disturbed, this condition and the pollution it has unleashed will continuously encroach upon the Morris and Wilson wells and the properties on which they sit. Your **explosives blasting** is believed to have occurred just outside and to the west of this portion of Georgia's Most Significant Ground-Water Recharge Area, which likely seismically impacted the regions within this sensitive Recharge Area.



These features reinforce the other factors detailed above as to timing, proximity, downgradient alignment, and the observed sediment impacts sustained by both the Morris and Wilson families shortly after substantial land clearing at the East Campus began. Put simply, Meta's construction activity occurred in a location where the aquifer is inherently sensitive to disruption (a Most Significant Ground-Water Recharge Area), and the resulting contamination of both domestic wells by sediment disturbed by that construction activity is entirely consistent with the disturbance of this significant-recharge system, wherein you used explosives to develop the site just outside of that system.

The harms to their wells and connected fixtures, plumbing and appliances that the Morris and Wilsons have endured was foreseeable, and was actually foreseen, given your selection of the East Campus site for large-scale deforestation, trenching, and excavation despite Georgia's designation of this zone as having "the greatest vulnerability to pollution of ground water from the surface and near service activities by man."

iv. Result: Ongoing, Worsening Groundwater Contamination

What had been stable, reliable drinking-water systems for these homes are now chronically impaired. The Morris and Wilson wells continue to deliver sediment-laden water drawn from the now-polluted aquifer; pressure and flow remain diminished, with water lines and fixtures impacted by sediment; filters and appliances such as washing machines fail prematurely

or malfunction; and the families must make continuous household adjustments to account for the nuisance and inconvenience imposed by sediment-laden water entering their homes. *See Figure 13 and Figure 14 below* (recent and ongoing Wilson and Morris groundwater well impacts).

The Wilsons' Well Impacts



The Wilson family has endured malfunction or failure of multiple appliances that use water, necessitating replacement of their water heater, frequent water filter changes, and repeated repair expenses to address sediment-impacted internal pipes and infrastructure. Plumbing visits provide temporary relief, only for reduced function to return after continual sediment intrusion. Lack of cold water pressure, drawn from a well that is mired with sediment, is now a constant headache, and mirrors the situation faced by the neighboring Morris family. The Wilson family must often suffer the indignation of timing showers and bathroom visits amongst themselves due to perpetual low water pressure, placing them in the unenviable position of deciding between running their washing machine, or allowing their son to take a shower, for example. Multiple systems in the home that rely on water are malfunctioning due to the continual introduction of sediment and “muddy water,” despite the relatively new age of these systems, initially installed in 2016. The Wilson’s replacement washing machine, purchased in 2018, constantly reports error messages tied to its water supply, exhibiting strain from sediment-polluted supply lines. Any

reservoir of water, such as bathwater, or toilet tanks exhibit the telltale brown, sediment-laden characteristics directly tied to well pollution from the now-impaired aquifer. These impacts were first observed in late 2020, with their effects increasing over time, and have plagued their home since.

The Morris' Well Impacts



Shortly following your mass grading and construction activity at Stanton Springs, the Morris' must likewise contend with the perpetual burden and inconvenience of low water pressure due to impaired water line function, seeking temporary relief only after disconnecting their water lines, and physically air blasting the interiors to dislodge sediment build up. (See, e.g., Figure 14, above; sediment-laden water extracted from water supply line air blasted to clear the line, dated Oct 12, 2025). As the Morris' were adjusting to their newly experienced plight, their 2.5 bedroom home was functionally reduced to one bathroom, at times requiring use of a bucket to generate enough water pressure to flush their toilets. Their kitchen sink essentially ceased supplying cold water, requiring perpetual bucket trips to provide enough water to perform basic household tasks, such as rinsing dishes or preparing food.

At various points in time, it was discovered that their son's bathroom ran mostly hot water drawn from their water heater reservoir, resulting in scalding due during showers because of insufficient cold water supply in that bathroom. In a desperate bid to restore basic plumbing

functions in their home, the Morrisises shut off all of their water, again air blasted the supply lines to clear them of sediment, and replaced sections of their plumbing and fixtures to remove portions impacted by sediment. They've endured this anxiety inducing, highly inconvenient and demoralizing situation since at least 2023. To combat these issues, the Morrisises spent thousands of dollars to repair or replace their interior pipes, fixtures, and water appliances, having to borrow money at times to do so. These repair and mitigation measures are merely a temporary respite until the sediment that now permeates the aquifer under their home intrudes once again.

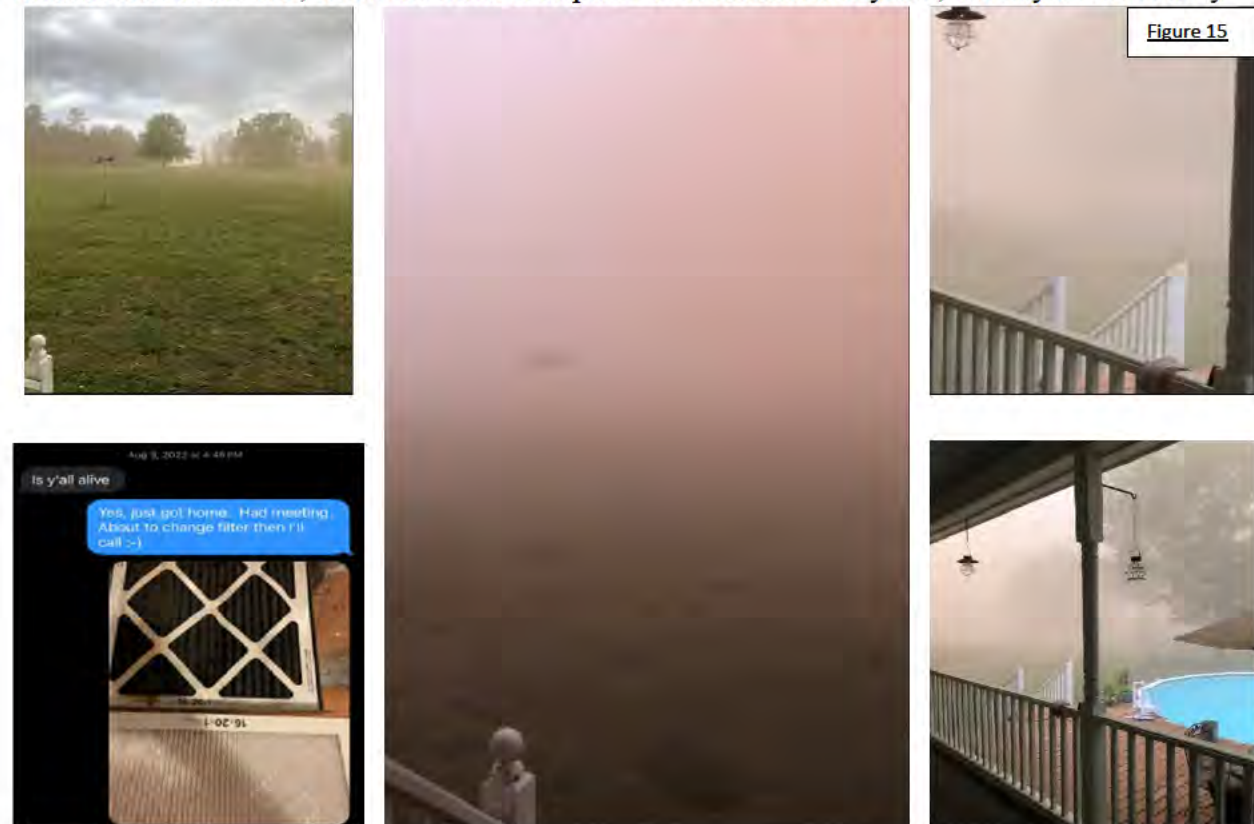
All of these impacts are consistent with a disturbed aquifer transporting fine sediment from the East Campus site to the nearby wells and properties, and was entirely foreseeable given the size, scope, nature, and duration of your site development, land disturbing, construction activity and ongoing operation, ownership, and control over the Stanton Springs site.

C. Dust, Light and Noise, Vibration Nuisance

After the land deforestation and grading removed the vegetative buffer, these families became exposed to industrial-scale dust, noise and illumination from the East Campus.

i. Dust

Meta's mass grading and deforestation left large areas of exposed red clay susceptible to wind erosion, caused by your continual failure to implement proper dust control and perimeter containment at the site, whereon work took place over months and years, not days. Particularly

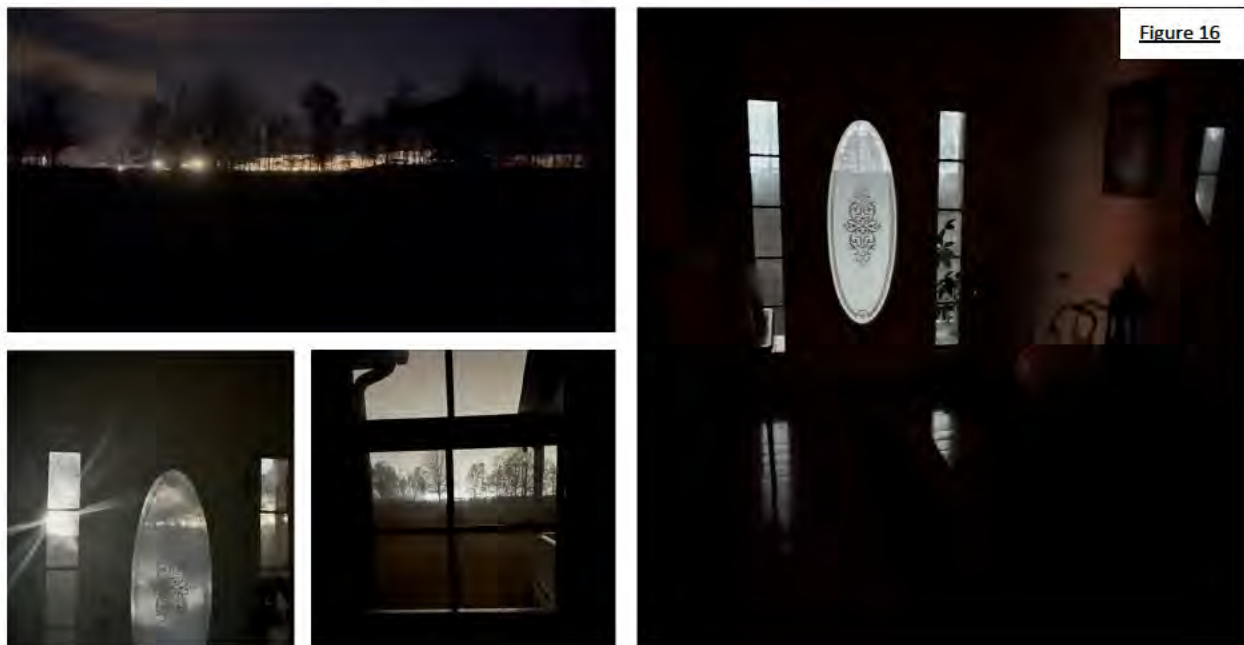


during active construction in 2021 – 2022, dust from these disturbed soils repeatedly migrated off the East Campus and settled onto the Morris and Wilson properties. The families documented dust clouds crossing Sewell Lane, coating porches, vehicles, outdoor furniture, and household surfaces, exposing them and their animals to your construction pollution. On multiple occasions, airborne particulates were dense enough to reduce visibility and force the families indoors.

HVAC filters clogged with unusual frequency, overwhelmed with high volumes of fine dust infiltrating their homes and interior air. The Wilsons recently replaced their HVAC unit prematurely, likely due to increased stress placed on the system having to contend with these impacts. These dust conditions did not occur before Meta's large-scale land disturbance across Sewell Lane. See [Figure 15](#), June 17, 2022 and August 9, 2022 dust impacts.

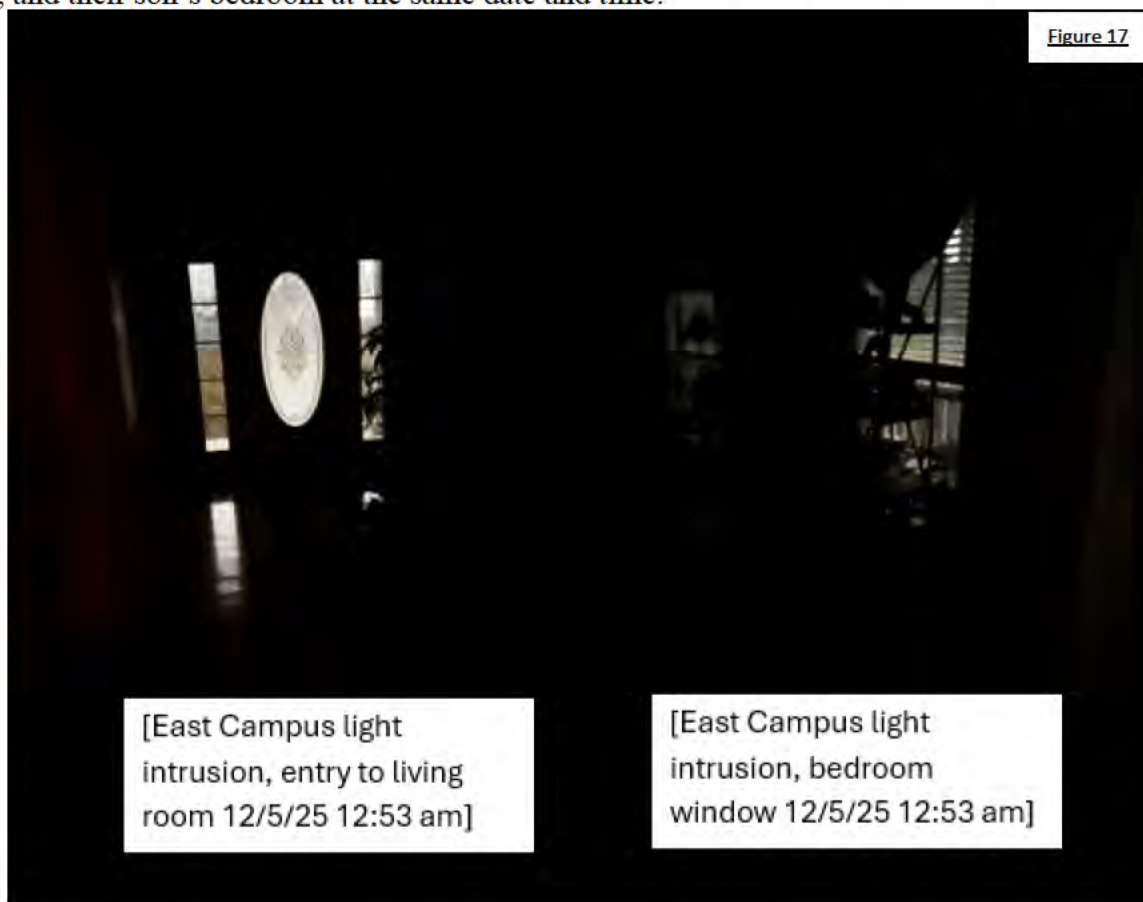
ii. Light pollution

With no tree cover remaining at the East Campus, Meta's elevated, high-intensity exterior lighting projects directly into the Morris home, illuminating living spaces and bedrooms throughout the evening. These lighting patterns are inconsistent with rural-residential use and are a continual disruption to the quiet enjoyment of the property. [Figure 16](#) shows the interior of the Morris home on January 24, 2024 (1:54/1:53 am); and May 8, 2025 (9:19 pm), and your unreasonable light intrusion from the East Campus.



Any purported mitigation measures you have undertaken in 2025 have failed to limit the unreasonable incursion of light into the Morris home after dark. [Figure 17](#) below shows the interior of the Morris home in the *middle of the night*, wherein your East Campus industrial lighting continues to intrude into their windows, including their living room and son's bedroom.

Figure 14 shows the Morris interior entryway to the living room on December 5, 2025 at 12:53 am, and their son's bedroom at the same date and time:



Prior to the development of Stanton Springs, the stars were visible in the clear night sky, with no artificial light intrusion in their windows after dark. Today, the East Campus artificially and unreasonably subjects their home to persistent lighting well beyond normal operational hours. Your nighttime illumination exceeds levels necessary for any reasonable purpose that might justify the annoyance and inconvenience imposed on the Morrises, creating an avoidable, continuous and foreseeable light trespass and nuisance. During overcast or cloudy evenings, the East Campus lighting is *worsened* in comparison with the conditions shown in Figures 16 and 17. Fog, cloud conditions or low-lying mist act as light reflectors off the intense exterior lighting system at the East Campus, creating an even brighter, uniform skyglow extending from your industrial park directly into the Morrises home after dark.

iii. Noise

The absence of tree cover and sound barriers at the perimeter of the site renders the massive industrial complex both a source of noise, and a ready conduit of increased traffic noise

from Interstate 75. Power generators, alarms, heavy equipment, and cooling infrastructure produce sustained sound levels far exceeding normal rural-residential expectations at Stanton Springs, disturbing the Morris and Wilson families' reasonable expectations of quiet enjoyment of their homes. The families recorded high-pitched alarms, loud generator noise late at night and during the day, and persistent daytime vibrations from construction and ongoing operations of the East Campus. Currently, the Morrises, whose home is roughly 1,000 feet from your site, experience a battery of electromechanical noises from the East Campus often resembling a continual "hum," punctuated by periods of increased noise activity when the generators kick in.

The construction and operation of your hyperscale data center across the street presents a clear and present threat to the health and well-being of the Morrises and Wilsons due to the threat of pervasive low frequency noise (LFN) and vibrations. Unlike noise that is readily audible to the human ear such as highway traffic, data center noise can generate perpetual LFN, exposing nearby residents to a significant nuisance. Because data centers generate massive amounts of heat, they must use an array of equipment such as industrial chillers, and banks of cooling fans, all of which can run for extended periods around the clock. These devices, alone or in combination, often emit a low-frequency "hum" or "drone" that operates at frequencies that aren't perceived by the human ear, but can inflict lasting harms on neighboring residents. LFN readily penetrates walls and structures, and is capable of causing significant, non-auditory human health effects even at low decibel levels.

These families never consented subjected to industrial scale LFN from the East Campus, from which they cannot escape. The Morrises and Wilsons are highly concerned about negative health impacts associated with the chronic LFN and vibration exposure to which they are likely subjected as a result of the East Campus operations, and question whether you have undertaken sufficient safeguards in the design, construction, and operation of the East Campus to properly assess and eliminate harmful LFN emissions into their homes. Both families have experienced severe sleep disruption and migraine headaches, as well as increased stress and anxiety following construction and initial operation of the East Campus, which has diminished and degraded their quality of life. These emissions constitute a private nuisance and a trespass that you are obligated to prevent and mitigate.

D. Nuisance, Trespass from Electrical Power Disruption, Displaced Wildlife

Beyond the well contamination and the dust, audible noise, LFN, and light pollution described above, these families have endured substantial additional disruptions to the quiet use of their properties. The Wilsons now must contend with ongoing, highly disruptive electrical instability that occurs without warning and that routinely causes the home's breaker panel to trip – a function used to protect their household circuits from damage. Each incident forces them to reset their breakers, often several times per week, prompting a reasonable fear of an unsafe, and certainly annoying and inconvenient home environment. For their part, the Morrises have experienced a similar loss of electrical power since your site operations at the East Campus began. The repeated loss or intermittent changes to the electrical power supply, including repeated tripping of the Wilson's electrical panel, underscores that the home's electrical infrastructure is likely being stressed beyond its intended operation conditions from an unstable

power source. As a result, these families are left with a reasonable fear of permanent electrical failure or damage to their appliances, compromised safety, and further degradation of property value.

The large-scale deforestation and construction activity displaced wildlife into the surrounding residential area, leading to pet injuries, suffering and deaths, as well as recurring encounters with wild animals that had not previously appeared on their land. The Morrisises have lost their beloved pet Beagle mix to a venomous snake bite shortly following your land-clearing activity in the winter of 2022, and the Wilsons have lost multiple pets to predation from wild animals in the same timeframe.

Individually, each of these impacts has diminished the families' ability to use and enjoy their homes. Taken together, they amount to an ongoing and substantial nuisance.

E. These harms are a continuing nuisance and trespass that must be abated

As the above shows, Meta's development has adversely impacted the groundwater supplying these homes, unreasonably interfering with the Morrisises' and Wilsons' use of their groundwater wells. And these well and surface water impacts do not stand alone; the same land disturbing, construction and operation activities that destabilized and polluted the aquifer also generated intrusive dust plumes, persistent industrial noise, and high-intensity nighttime lighting; each of which has independently and cumulatively impaired the families' ability to use and enjoy their homes.

Your improper construction, development, and operation of the Stanton Springs Data Center, including each of the injuries, harms, and conditions detailed above constitute both a nuisance and a trespass. Under O.C.G.A. § 41-1-1 et seq., a nuisance includes any activity that unreasonably interferes with another's use and enjoyment of private property, regardless of whether the conduct occurs on an adjoining parcel. Likewise, Georgia trespass law, O.C.G.A. § 51-9-1 et seq., recognizes that a physical invasion of land can occur through subsurface intrusion, including the migration of soil, fluids, silt, sediment, vibrations, dust, noise, light, and other disturbances generated by construction activity. The conditions described herein are both a nuisance and a trespass, and continue to harm the Morris and Wilson families on a daily basis.

As set forth above, your explosive blasting performed at least in March 2024 approximately 1.1 miles from the affected homes consisted of the removal/disruption of at least 155,000 cubic yards of rock and dirt. Georgia law has long recognized that blasting with explosives is a quintessential ultrahazardous activity that carries strict liability for all resulting harms, regardless of the degree of care exercised. This is true whenever vibrations, air blast, concussive forces, or related effects cause injury to nearby homes, wells, structures, or land. Blasting produces high energy shockwaves and ground vibrations that travel through soil and bedrock. In undertaking blasting to develop Stanton Springs, Meta (and its affiliated entities) and contractors assumed strict liability for all resulting impacts to adjacent residential properties, including disturbances of groundwater, sediment mobilization, well impairment, structural

vibrations, nuisance, physical displacement of soil or water, and the resultant harms sustained by the Morris and Wilson families as exhaustively set out in this letter.

Preservation of records

We are hopeful that the parties can find an amicable solution to these issues. Nevertheless, this letter is notice of your legal obligation to preserve all records relevant to this matter. If you fail to properly secure and preserve this evidence, it will constitute spoliation and give rise to a legal presumption that the evidence would have been harmful to your side of the case. This includes, but is not limited to

- Blasting report(s), including pre-blast report, drilling logs, post-blast records, and other documentation required by law concerning the blasting conducted at Stanton Springs in 2024 or any other blasting that occurred at or near Stanton Springs, including the West Campus and East Campus sites or nearby areas;
- Any correspondence, photos and videos, construction drawings, engineering plans, as-built records, inspection reports, applications, and permits relating to the Stanton Springs Data Center East Campus or West Campus, including but not limited to excavation / drilling records for the installation of fiber optic cables, underground pipes and infrastructure, slab foundation and erection of multi-story warehouse structures, and installation, maintenance and operation of surface water ponds / impoundments;
- Notes, memos, email correspondence, video recordings, audio recordings, or photographs relative to either the Wilson Property or the Morris Property, including any recordings of visits among representatives of Meta or contractors engaged on its behalf and Beverly Morris;
- Permits and permit applications relating to the East Campus, including land disturbing permits, construction permits, inspection records, and communications with regulators and agency representatives;
- Pre- and Post-construction surveys or Impact Assessments bearing on ambient light and noise for the East Campus, including assessments of Low Frequency Noise (LFN) and Infrasound, detailing low-frequency metrics assessed, LFN or vibration effects modeling, and mitigation measures considered or implemented, such as Acoustic Barriers or sound dispersion equipment or measures; and
- Records of maintenance of surface water ponds on the Stanton Springs East Campus, including memos, emails, letters, work orders/repair and maintenance logs related to any actual or suspected leaks or structural compromises to any surface water pond at the East Campus.

Conclusion

The harms sustained by the Morris and Wilson families are continuing. Given the enormity of the sediment, silt, disturbed soils and groundwater that is believed to be unleashed by the Stanton Springs development project across the street from their homes, these families quite reasonably expect that injuries to their property interests, as well as the hurt, annoyance and inconvenience they have sustained will continue unless and until you immediately take measures to abate and rectify the ongoing encroachment of the Morris' and Wilsons' land, air, surface water and groundwater.

The street address for Building 1 at the East Campus is 100 *Move Fast* Way, Social Circle Georgia, 30025. In taking this "Move Fast" approach, you have failed to undertake reasonable, proper accounting of the harmful impacts that Stanton Springs is having on its neighbors – the Morris' and Wilsons. Now is the time to cease these harms. In that vein, we look forward to working with you toward a prompt and amicable resolution of this matter, so that these families can be made whole and put an end to a saga that they neither asked for, nor deserve. Should you act promptly and in good faith, the Morris' and Wilsons are committed to doing the same.

Any correspondence regarding this matter should be directed to the undersigned counsel at the address set forth above. Please respond to this demand and request to schedule a meeting to discuss the means of ceasing these conditions and resolving these harms by no later than January 16, 2026.

Sincerely,



Christopher J. Bowers

cc: George Lott
Stacey Evans

Enclosures (appended figures)

Attachments

Figure 1

Figure 2

Figure 3

Figure 4

Figure 5

Figure 12

Figure 1

East Campus

West Campus

Estimated Vacuum Excavation Trench Line

**Mar. 29, 2024
Estimated Blasting Area**

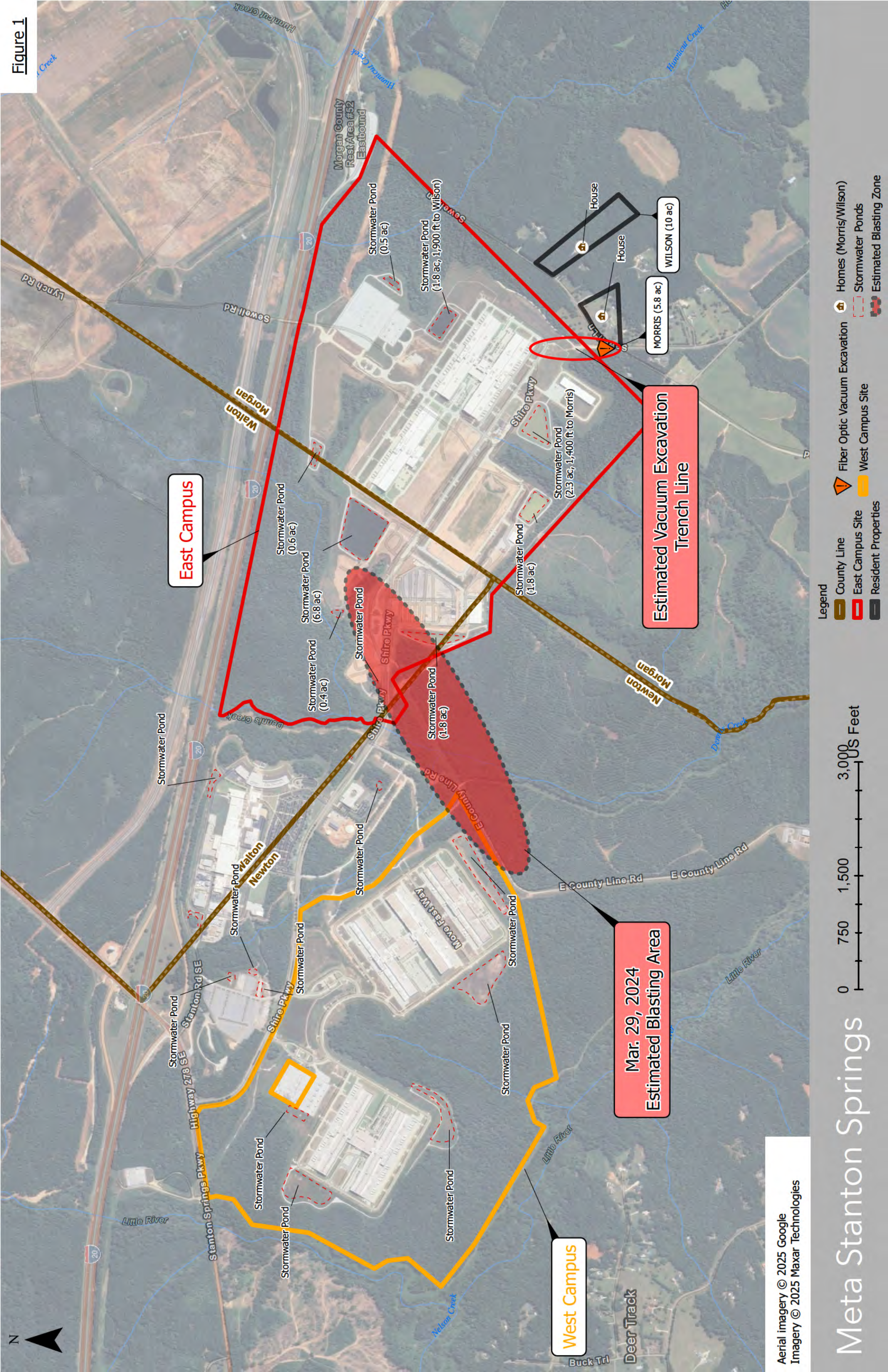
Legend

- County Line
- East Campus Site
- Resident Properties
- Fiber Optic Vacuum Excavation
- Homes (Morris/Wilson)
- Stormwater Ponds
- West Campus Site
- Estimated Blasting Zone

Scale: 0 750 1,500 3,000 US Feet

Meta Stanton Springs

Aerial imagery © 2025 Google
Imagery © 2025 Maxar Technologies



Aerial imagery © 2025 Google
Imagery © 2025 Maxar Technologies

Meta Stanton Springs

Legend

-  County Line
-  East Campus Site
-  West Campus Site
-  Fiber Optic Vacuum Excavation
-  Homes (Morris/Wilson)
-  Stormwater Ponds
-  Estimated Blasting Zone

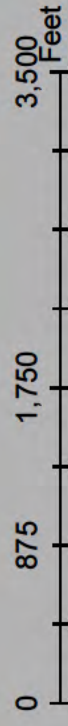
JAN 2018



Esri, Inc. (2025). World Imagery (Wayback) [Imagery layer]. Imagery acquisition date: Jan 2018. <https://wayback.maptiles.arcgis.com/>

Meta Stanton Springs

Legend



- | County Line | Resident Properties | Homes (Morris/Wilson) |
|------------------|---------------------|-----------------------|
| East Campus Site | West Campus Site | Potable Wells |

Figure 2

Figure 3



Figure 3

Figure 3

Figure 3



- ### Figure 3

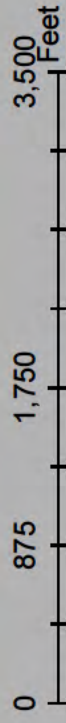
FEB 2023



Esri, Inc. (2025). World Imagery (Wayback) [Imagery layer]. Imagery acquisition date: Feb 2023. <https://wayback.maptiles.arcgis.com/>

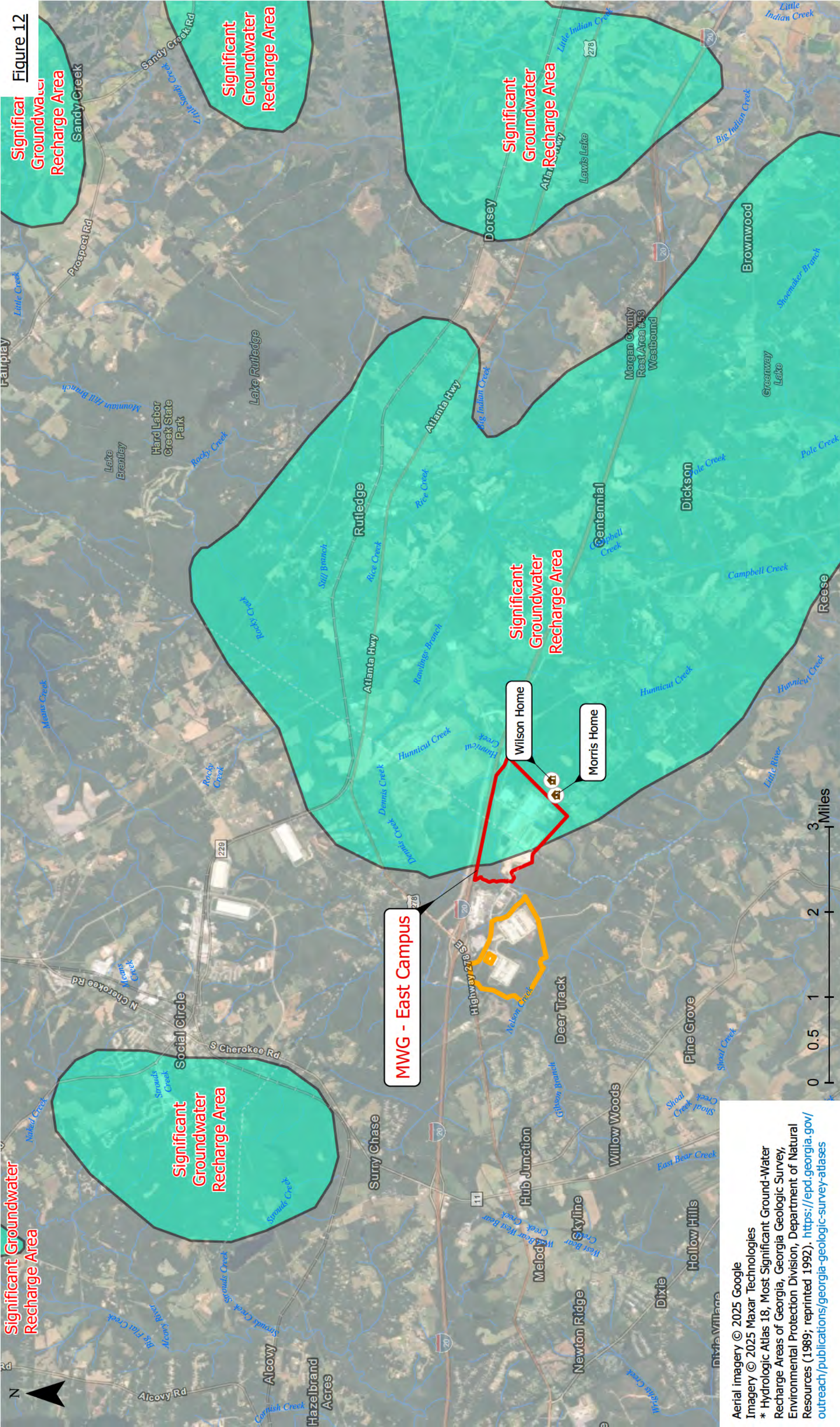
Meta Stanton Springs

Legend



Resident Properties Homes (Morris/Wilson)
West Campus Site Potable Wells

Figure 4



Aerial imagery © 2025 Google
Imagery © 2025 Maxar Technologies
* Hydrologic Atlas 18, Most Significant Ground-Water
Recharge Areas of Georgia, Georgia Geologic Survey,
Environmental Protection Division, Department of Natural
Resources (1989; reprinted 1992). [https://epd.georgia.gov/
outreach/publications/georgia-geologic-survey-atlases](https://epd.georgia.gov/outreach/publications/georgia-geologic-survey-atlases)

EXHIBIT B

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Holder Construction Company
3300 Riverwood Parkway
Suite 1200
Atlanta, GA 30339



9590 9402 9310 4295 7871 22

2. Article Number (Transfer from service label)

9589 0710 5270 3788 9572 04

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *M. K. Krena*

- ☐ Agent
- ☐ Addressee

B. Received by (Printed Name)

M. K. Krena

C. Date of Delivery

1-30-26

D. Is delivery address different from item 1? If YES, enter delivery address below:

- ☐ Yes
- ☐ No

3. Service Type

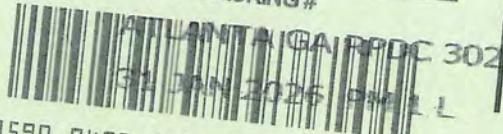
- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☐ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Signature Confirmation Restricted Delivery

- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2020 PSN 7530-02-000-9053

Domestic Return Receipt

USPS TRACKING #



9590 9402 9310 4295 7871 22

United States
Postal Service

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4® in this box•

Evans | Bowers

729 PIEDMONT AVE, NE | ATLANTA, GA 30308

CTB

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Plateau Excavation, Inc.
c/o CSC of Cobb County, In.
192 Anderson Street SE, Suite 125
Marietta, Georgia 30060



9590 9402 9310 4295 7871 15

2. Article Number (Transfer from service label)

9589 0710 5270 3788 9572 11

PS Form 3811, July 2020 PSN 7530-02-000-9052

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent☐ Addressee

B. Received by (Printed Name)

T. Thompson

C. Date of Delivery

1/28

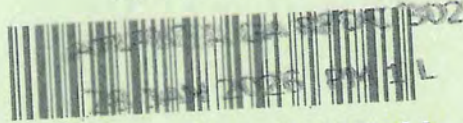
D. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ No

3. Service Type

☐ Adult Signature☐ Adult Signature Restricted Delivery☒ Certified Mail®☐ Certified Mail Restricted Delivery☐ Collect on Delivery☐ Collect on Delivery Restricted Delivery☐ Priority Mail Express®☐ Registered Mail™☐ Registered Mail Restricted Delivery☐ Signature Confirmation™☐ Signature Confirmation Restricted Delivery☐ Mail Restricted Delivery

Return Receipt

USPS TRACKING#



9590 9402 9310 4295 7871 15

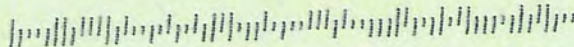
United States
Postal ServiceFirst-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

- Sender: Please print your name, address, and ZIP+4® in this box*

Evans | Bowers

729 PIEDMONT AVE, NE | ATLANTA, GA 30308

CSB



Evans | Bowers

CHRISTOPHER J. BOWERS
DIRECT DIAL: 404.850.6747
E-MAIL: cbowers@evansbowers.com

January 23, 2026

Via Certified Mail

9589 0710 5270 3788 9572 04

Holder Construction Company

3300 Riverwood Parkway

Suite 1200

Atlanta, GA 30339

Via Certified Mail

9589 0710 5270 3788 9572 11

Plateau Excavation, Inc.

c/o CSC of Cobb County, In.

192 Anderson Street SE

Suite 125

Marietta, Georgia 30060

Via Certified Mail

9589 0710 5270 3788 9572 28

Barge Design Solutions, Inc.

6525 The Corners Parkway

Suite 450

Peachtree Corners, GA 30092

RE: **Demand to Abate Continuing Nuisance and Trespass to Property of Beverly and Jeff Morris, Chris and Lindsay Wilson in Morgan County, Georgia**

Meta Stanton Springs Data Center

To whom it may concern:

This firm has been retained by Beverly and Phillip J. (Jeff) Morris, and Chris and Lindsay Wilson regarding past and ongoing damage to their interests in real properties in Mansfield, Georgia more specifically described as follows: approximately 6.4 acres at 1121 Sewell Lane, Mansfield GA 30055, Morgan County Parcel No. 014 032 ("Morris Property"); and about 10 acres at 1201 Sewell Lane, Mansfield Georgia 30055, Morgan County Parcel No. 014 035 ("Wilson Property").

The Morris Property and the Wilson Property are located across Sewell Lane from a rural, hyperscale data center known as the "Meta Stanton Springs Data Center." The cause of the Morris' and Wilsons' damages, and each of your roles in it, is more fully described in that certain letter from this office addressed to Meta Platforms, Inc. Morning Hornet LLC, Baymare LLC, and Meta Stanton Springs dated December 16, 2025, which is attached hereto as

Attachment 1 and incorporated herein by reference (such letter is hereinafter referred to as the “*Morris Wilson Demand letter to META*”).¹

We understand that each of the addressees of this letter (Holder Construction, Plateau Excavation, Inc., and Barge Design Solutions, Inc.) had and may continue to have involvement with the development of the Meta Stanton Springs Data Center site as described in the *Morris Wilson Demand letter to META* so as to be in position to abate the pollution and other harmful conditions that is the subject of this letter and exhaustively set forth in Attachment 1. For its part, Barge Design Solutions, Inc. likely engaged or participated in pre-development due diligence, site feasibility analysis and other actions concerning the East Campus site, much of which sits atop a Most Significant Ground-Water Recharge Area designed by the Georgia Geologic Survey where the Morris’ and Wilsons’ residential drinking water wells are also located. Barge Design likely participated in the planning, design, and site work for the project, including clearing, mass grading, blasting coordination, and stormwater activities. Plateau Excavation, Inc. likely executed the physical land-disturbing work, including mass-clearing of the site vegetation, grading, drilling and blasting, as well as trenching operations (including those depicted in Attachment 1). Holder Construction Company likely served as the prime contractor coordinating and supervising, hence exercising control over, the work performed by Plateau Excavation and Barge Design, including how the grading, blasting, excavation, stormwater, and infrastructure operations were performed, and is currently being maintained. This letter will serve as the Morris’ and Wilsons’ notice of claim and request for abatement of nuisance and trespass pursuant to O.C.G.A. § 41-1-1 *et seq.* a

As noted in the attached, these families requested a meeting with Meta to discuss these matters. Regrettably, their good faith attempts to open a dialogue with Meta has been unsuccessful, as Meta has not responded. The Morris’ and Wilsons continue to live – *literally* – with these harms in the face of Meta’s conspicuous silence and pointed refusal to act, which serves to further evidence its intent to inflict ongoing trespass and nuisance harms on these families.

Because of your involvement in the planning, development, construction, and ongoing operation of the Meta Stanton Springs Data Center that has directly caused the conditions detailed in the enclosed *Morris Wilson Demand letter to META*, we insist that you take immediate action to abate the continuing nuisance and trespass that is the subject of this letter. These actions should include but not be limited to: (1) investigate, cease and prevent continuing surface discharge and subsurface migration of sediment, silt and fines onto these properties and onsite wells; (2) investigate, document, and notify Georgia EPD of a release and discharge of pollutants, groundwater contamination, failure of erosion and sedimentation controls, and construction-related alteration of groundwater conditions; and (3) develop a remedial action plan

¹ These entities are collectively referred to herein as “Meta.” The reference to Interstate “75” in the *Morris Wilson Demand letter to META* is corrected to refer to Interstate 20 in the attached.

and feasibility study to rectify and cure the conditions described in the *Morris Wilson Demand letter to META*. We ask that you promptly notify us of your receipt of this letter and seek a time to discuss the means by which these harms can be ceased, and rectified.

Should you fail to timely and appropriately act, the Morris and Wilsons reserve the right to recover damages, litigation expenses and attorneys' fees, and punitive damages under Georgia law as a result of all past harms which they have suffered, and all future harms with which they are threatened with as a result of your development, operation and control over the means by which they have been harmed relative to the Meta Stanton Springs Data Center site. They also reserve all other rights and remedies they may have under law and principles of equity.

This letter will further serve as a notice of claim. O.C.G.A. § 33-3-28(a)(2) provides that, within thirty (30) days of receiving this notice, you are required to disclose "the name of each known insurer which may be liable to the claimant upon such claim." Accordingly, you are requested to notify your insurance carrier of the Morris' and Wilsons' claims and provide the undersigned, in writing, with the name and address of each and every insurance company that you believe may provide you with coverage relating to the claims described herein.

Finally, we are notifying you of your obligation to preserve all evidence relevant to this matter. If you fail to properly secure and preserve this evidence, it will constitute spoliation and give rise to a legal presumption that the evidence would have been harmful to your side of any case related to these matters. This preservation obligation includes but is not limited to all records and information described on page 21 of the *Morris Wilson Demand letter to META* and: (i) photos and videos, (ii) investigation reports, (iii) construction drawings, (iv) engineering plans, (v) erosion and sedimentation pollution control plans, (vi) inspection and monitoring reports, (vii) applications, (viii) permits, (ix) well surveys (onsite and offsite), (x) blast plans, (xi) geotechnical engineering records, (xii) as-built records, (xiii) site planning and feasibility records, including those referencing Georgia Geologic Survey Hydrologic Atlas 18, Most Significant Ground-Water Recharge Areas, (xiv) written communications with Meta Platforms, Inc., Morning Hornet LLC, Baymare LLC, or the Joint Development Authority of Jasper County, Morgan County, Newton County & Walton County concerning the Meta Stanton Springs Data Center, or (xv) notes, memos, or mail or email correspondence identifying or concerning Beverly Morris, the Morris, or the Wilsons.

We request that you respond to this demand within 30 days. Any correspondence regarding this matter should be directed to the undersigned counsel at the address set forth above. Please be advised that you are not permitted to enter upon any portion of our clients' property without permission and the presence of the undersigned counsel.

Holder Construction Company, Plateau Excavation, Inc.,
Barge Design Solutions, Inc.
January 23, 2026

Page 4

Sincerely,



Christopher J. Bowers

cc: George Lott
Stacey G. Evans

Enclosure

Attachment 1

Evans | Bowers

CHRISTOPHER J. BOWERS
DIRECT DIAL: 404.850.6747
E-MAIL: cbowers@evansbowers.com

December 16, 2025

Via Certified Mail

9589 0710 5270 3788 9569 62

Meta Platforms, Inc.

c/o Corporation Service Company
2 Sun Court, Suite 400
Peachtree Corners, GA 30092

Via Certified Mail

9589 0710 5270 3788 9569 86

Baymare LLC

c/o Corporation Service Company
2 Sun Court, Suite 400
Peachtree Corners, GA 30092

Via Certified Mail

9589 0710 5270 3788 9569 79

Morning Hornet LLC

c/o Corporation Service Company
2 Sun Court, Suite 400
Peachtree Corners, GA 30092

Via Certified Mail

9589 0710 5270 3788 9569 93

Meta Stanton Springs

Building 1
100 Move Fast Way
Social Circle, Georgia 30025

RE: **Demand to Abate Continuing Nuisance and Trespass to Property of Beverly and Jeff Morris, Chris and Lindsay Wilson in Morgan County, Georgia**

Meta Stanton Springs Data Center

Meta, Morning Hornet and Baymare (collectively, "Meta"):

This firm has been retained by Beverly and Phillip J. (Jeff) Morris, and Chris and Lindsay Wilson regarding past and ongoing damage to their real property caused by your development, ownership and operation of a rural, hyperscale data center complex across the street from their homes.

This letter is a good faith attempt to promptly find a solution that will cease your past and ongoing interference with the Morris' and Wilson's use and enjoyment of their property, and remedy the harms they have sustained as a result of your unreasonable development and operation of the Stanton Springs Data Center in Social Circle Georgia (formerly known as the Newton Data Center). The Morris' and the Wilsons have sustained damages from silt and sedimentation in their water supplies and sediment intrusion, premature failure of home appliances, loss of reasonable use of water fixtures and plumbing and clogged pipes and water lines, disruption of electrical power, excessive noise and vibration, light pollution, and other harms and losses from your land disturbing, development, ownership and operation of the Stanton Springs Data Center.

We understand that each of the addressees of this letter have had and may continue to have involvement with the development of the Meta Stanton Springs Data Center site so as to be in position to abate the pollution and ongoing harms set forth in this letter. It is their sincere hope that Meta will decide to engage in a good faith, in-person discussion to arrive at a prompt, permanent resolution that will end the harms imposed on them by the Stanton Springs Data Center, in the hopes of avoiding unnecessary litigation. Nevertheless, to preserve their interests, this letter places Meta on formal notice of their claim and demand for abatement of nuisance pursuant to O.C.G.A. § 41-1-1 *et seq.* as well as trespass and interference with enjoyment and use of their property pursuant to O.C.G.A. § 51-9-1. The Morris and Wilsons likewise reserve the right to pursue relief against you and others who are liable for their losses and damages for nuisance and trespass, as well as damages arising under negligence, negligence per se for violations of the Georgia Erosion & Sedimentation Act and Georgia Water Quality Control Act, strict liability for ultrahazardous activity, and other theories, including injunctive and other equitable relief, as well as punitive damages.

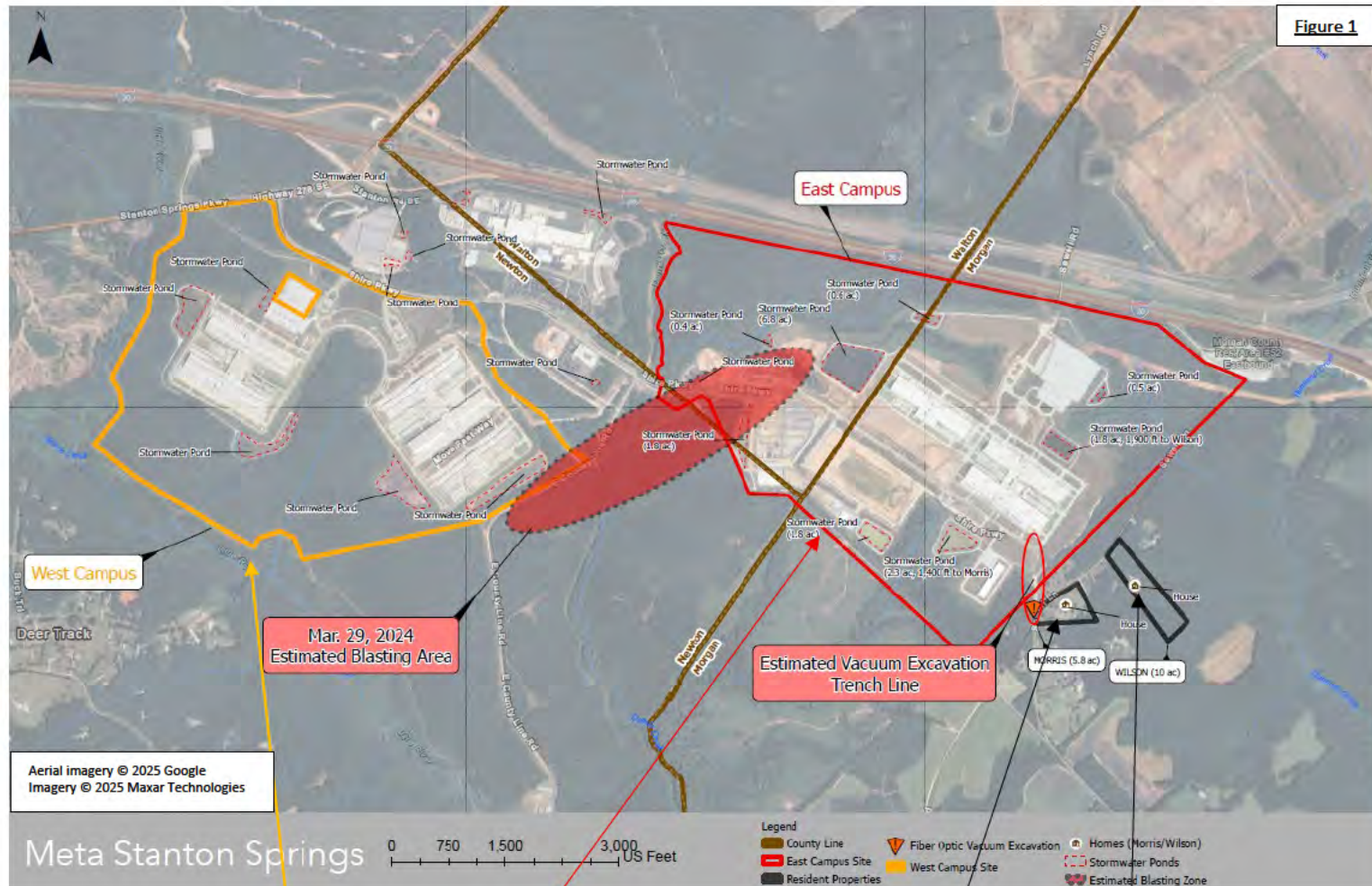
The facts set forth herein are based on information presently available and reflect reasonable investigation conducted to date. This demand is made without waiver of rights, and all factual statements are necessarily subject to revision or supplementation as additional documents, data or disclosures become available.

I. The Properties Harmed by the Stanton Springs Data Center

Beverly and Jeff Morris own a home on approximately 6.4 acres at 1121 Sewell Lane, Mansfield GA 30055, Morgan County Parcel No. 014 032 (“Morris Property”) (See [Figure 1](#), next page). Chris and Lindsay Wilson own a home on about 10 acres at 1201 Sewell Lane, Mansfield Georgia 30055, Parcel No. 014 035 (“Wilson Property”) ([Figure 1](#)). Both the Morris Property and the Wilson Property are zoned R4-Residential.

The “Meta Stanton Springs Data Center” refers to a colossal complex of buildings and supporting infrastructure spread across two campuses collectively occupying portions of *three* Georgia counties – Walton, Newton, and Morgan. ([Figure 1](#), below).

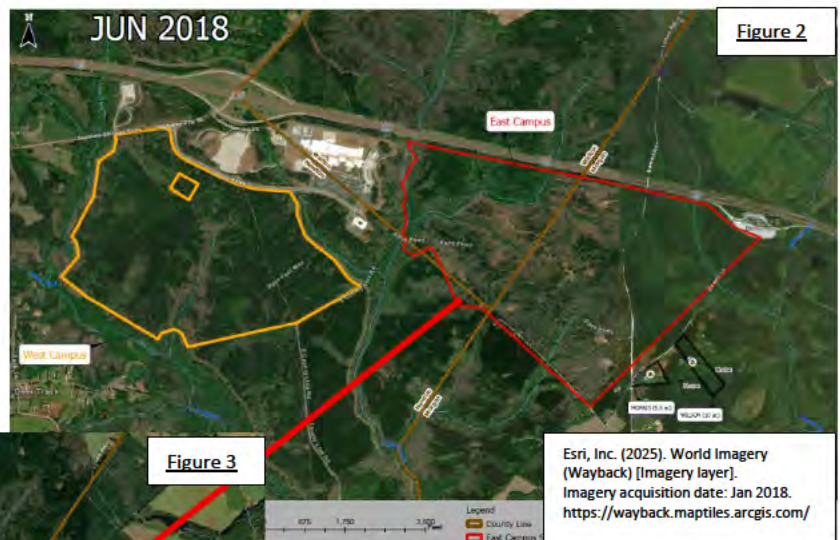
[See next page]



The Stanton Springs **“East Campus,”** Morgan County Parcel No. 013 044, occupies more than 566 acres bordered on its East by Sewell Lane. The **Morris Property** and **Wilson Property** are located on the other side of Sewell Lane. The East Campus is on land owned by the Joint Development Authority of Jasper County, Morgan County, Newton County & Walton County (or “JDA”).

The **“West Campus”** occupies about 416 acres within Walton County, parcel No. 01340005, also owned by the JDA. As its name suggests, the West Campus sits further to the west of the East Campus. Collectively, the Stanton Springs Data Center was developed by Baymare LLC (“Baymare”) and Morning Hornet LLC (“Morning Hornet”), and is run by Meta Platforms, Inc. (“Meta”).

The project broke ground in 2018. Figures 2 through 5 illustrate the transformation of the neighborhood relative to where the Morris and Wilson families live.¹ What was once a refuge in nature selected by the Morrises and Wilsons for its seclusion and tranquility in 2016 (Morris), and in 2020 (Wilson) resembles nothing like it did when these families purchased their homes.



By late 2020, both families observed rapid deforestation across immense swathes of land west of their properties, eventually leaving bare red clay earth where a forest once stood. Site development included large-scale grading to prepare a foundation for multiple building pads, subsurface excavation, trenching and other land disturbing activities

This land clearing, grading, excavation, and industrial scale earthmoving operation lasted for well over a year, given the size of the East Campus.



¹ Full page Figures 1 through 5 are appended to this letter.

Today, the East Campus houses thousands of computer servers, cooling infrastructure including surface water ponds, fans, and electrical power generators, and fiber-optic infrastructure supporting “cloud” based computing operations.

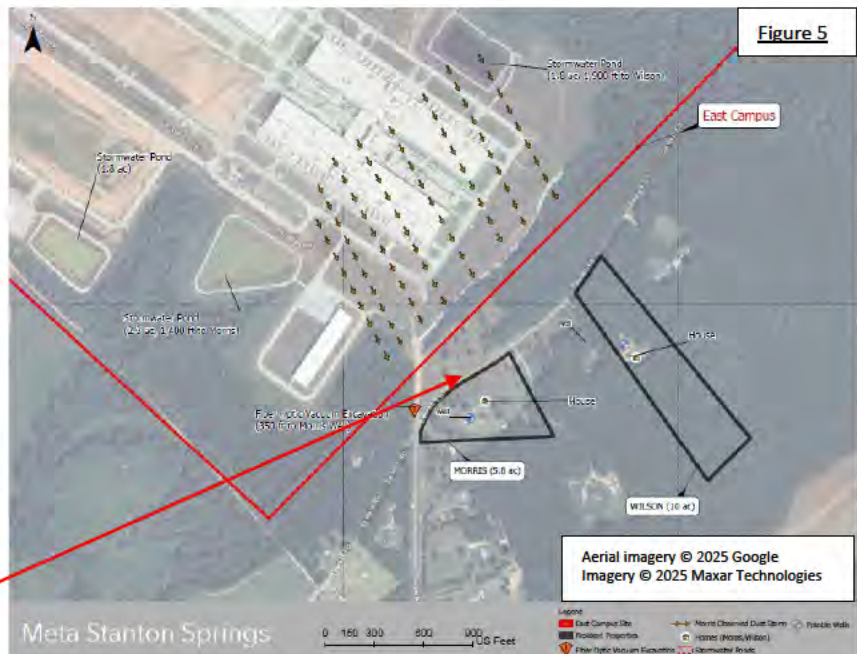
To connect these computer systems to the network, you engaged contractors to excavate trenches and perform related work to install underground fiber optic conduits, including work performed in proximity to the eastern edge of the East Campus, which is bordered by **Sewell Lane**. The Morris Property and the Wilson Property lie at the other side of Sewell Lane from the East Campus.

The scale of your land disturbing and construction activity involved years-long, nearly daily operation of heavy equipment at various stages and in various proximity to the Wilson and Morris homes, including vacuum excavation (“hydrovac” or “vac-ex”) and trenching, and sustained site work to construct the multi-structure industrial park where the East Campus now sits. In at least one instance, your development work included explosives blasting to prepare portions of the Stanton Springs Data Center site, in a location believed to be approximately 1.1 miles from the Morris Property (see [Figure 1](#) above).

The cumulative effect of these operations is substantial disturbance of soil, overburden, and shallow groundwater flow paths that are continuing to adversely affect the Wilsons and Morrisises, whose homes are located just across the street from the massive East Campus site. In every sense of the term, Stanton Springs and the Morrisises and Wilsons are neighbors. As detailed in this letter, under any reasonable interpretation of the term, Meta has been anything *but* a good one.

II. Summary of Harms

The following non-exhaustive summary of harms flow directly from Meta's transformation of a once-forested, quiet rural-residential area into a continual nightmare for the Morries and Wilsons. In sum, Meta's mass clearing, excavation, regrading, blasting, and high-intensity operations triggered a cascade of adverse impacts that haunt them to this day: contaminated wells, sediment migration, intrusive noise and light, dust, wildlife displacement,



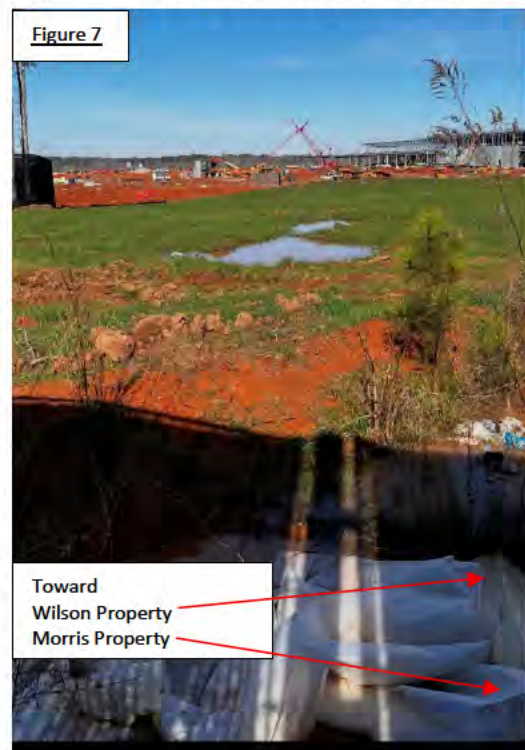
and loss/degradation of basic residential functions such as reliable electricity and home appliances and fixtures that malfunction and fail.

These harms are not trivial or fanciful; they are highly intrusive, substantially degrading daily life. These conditions did not exist before Meta's development began across the street.

A. Surface-Water Runoff/Contamination

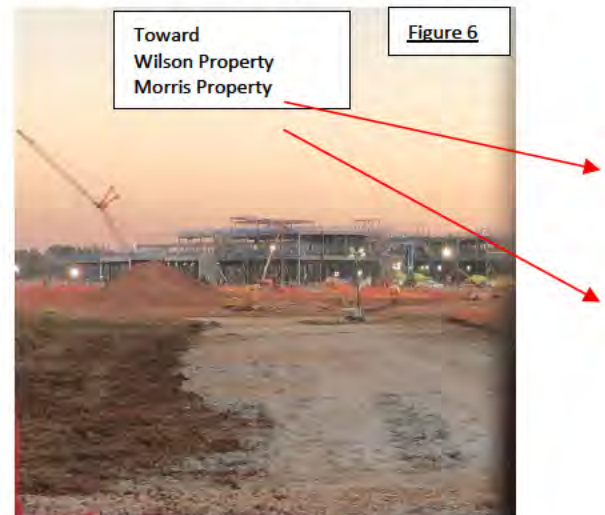
Adjacent to the Morris and Wilson homes, Meta transformed what was once a heavily forested landscape (e.g. [Figure 2](#) above, 2018) into a massive industrial zone on the other side of the street (e.g. [Figures 1, 3-4](#) above). More than 470 acres (roughly equivalent to 350 football fields) were stripped of vegetation, and over 4 million cubic yards of soil were graded, excavated, and reshaped—along with roughly 155,000 cubic yards of bedrock blasted—to build the East and West Campus facilities. The scope of these activities was unprecedented at the time in this rural-residential setting: entire ridgelines were removed, red-clay soils were exposed, and the natural drainage patterns that had existed for generations were fundamentally altered.

Meta's mass clearing and grading exposed wide expanses of red clay directly upslope of the Morris and



Wilson homes (e.g., [Figures 3-4](#) above). Without the forest canopy and root systems that once stabilized these soils,

Meta's mass grading left large areas of loose, exposed red clay highly susceptible to erosion and rainfall.



To install fiber optic cables underground to connect the East Campus data center to the cloud, you and your contractors performed hydro-excavation (or Vacuum excavation) trenching, and possibly horizontal drilling, along the corridor from the East Campus toward Sewell Lane across the intersection from the



Morris Property, further uncovering and destabilizing these soils (See [Figure 8](#) below, Vacuum excavation May 23, 2023 and nearby pollution impacts).

- East Campus
- Hydrovac trenching zone
- Morris well water



In performing this work, you created additional pathways for sediment to mobilize downslope in the direction of the Morris and Wilson properties. The effects are significant and ongoing. As shown in [Figure 8](#), stormwater runoff now carries sediment from both the graded areas and these trenching operations into roadside ditches and swales, continuing onto the Morris Property.

These runoff patterns emerged only after this land disturbing work took place and remain to this day. Red-clay sediment matching the exposed soils on Meta's site (e.g. [Figures 3-7](#) above) now accumulates in the roadside ditch on the Morris Property along Sewell Lane, moving downslope toward the Wilson Property during large rain events. As shown in [Figure 8](#) (Vacuum excavation May 23, 2023) and resulting impacts May 29, 2025 and November 9, 2025, this sediment pools during rain events, collects in drainage swales, and discharges across the



intersection (including through a corrugated pipe) to and alongside Sewell Lane, precisely along the downgradient path from the East Campus toward the Morris and Wilson homes and their onsite wells. As shown on [Figure 8](#) above and [Figures 8A](#) and [8B](#) below, these sediment-laden ditches are upgradient to and a short distance from the Morris' groundwater well.

This surface sediment runoff is not an isolated occurrence. It is now a recurring condition caused by inadequate and unreasonable construction and land disturbing activity over which you have control in the planning, development, and continual operation and maintenance of Stanton Springs, and it is consistent with the lack of vegetative cover, the magnitude of grading, and the insufficient containment of disturbed soils on your site.

As shown herein, the Morris experienced and continue to experience sediment deposits on their land after significant rainstorms, as well as visible sediment contamination in ditch flow, with progressive buildup of sediment fines in drainage areas that had previously remained clear.



The source of the Morris and Wilson well contamination is obvious: Meta's land disturbance on and from the East Campus exposed vast areas of erodible soil; precipitation and stormwater has



mobilized that sediment, and the downstream drainage path now carries it directly toward the Morris and Wilson properties.

B. Well Damage and Groundwater Contamination

These surface disturbances are only part of the story; Meta's land disturbing, construction and ongoing operation at Stanton Springs has materially altered the subsurface features and characteristics that supply these families' drinking water, harming them. Because the Morris

and Wilsons rely exclusively on well water, it is foreseeable that improper land disturbing activity on your site across the street would directly impact them and their water supplies – which is precisely what is happening.

Before Meta started its significant deforestation of the East Campus site, the Morris and Wilsons relied on stable, trouble-free water supplied by groundwater wells. Their water was clear, water pressure was consistent, and they had no issues with sediment infiltration. The Morris engaged a certified home inspector prior to purchasing their home in 2016 as part of their purchase due diligence, documenting no plumbing, fixture, well or drinking-water problems.

Similarly, in July 2020, the Wilsons engaged a certified home inspector, documenting the onsite well conditions as having no issues with respect to sediment or siltation. Figure 9 is the Wilson's whole home water filter drawn from their well, as of their July 2020 Home Inspection report, prior to Meta's mass-land disturbing activity at the East Campus. Figure 11 below is the *same* filter on December 8, 2025, clogged with sediment overwhelming their groundwater well from the East Campus site. The filter had been replaced just a month prior (Figure 10).



Figure 9 (Wilson water filter, July 29, 2020)



Figure 10 (Wilson water filter being replaced Nov. 9, 2025)



Figure 11 (Wilson water filter, December 8, 2025)

Water quality from both the Wilson and Morris wells changed only when Meta began large-scale construction across the street in late 2020, disturbing the recharge soils and shallow fractured-rock aquifer that supplies these homes.

Well contamination began only *after* your land disturbing work.

Meta's soil excavation, heavy equipment operations, hydro-excavation trenching, grading, blasting and other activities and failures to act occurred near the Morris and Wilson properties—well within the zone influencing the shallow aquifer that provides their drinking water. Shortly after these operations began to significantly disturb soils in late 2020, both families experienced signs of groundwater degradation and resulting harms, including:

- Sediment-laden, cloudy, reddish well water
- Rapid degradation of the Wilson's home water filter, requiring unreasonably frequent filter changes that have failed to eliminate sediment intrusion in the home's water supply
- Clogged pipes, water supply lines and fixture failures due to sediment build up
- Malfunction and premature failure of water-dependent appliances; the Morris Family has replaced their washing machine *multiple* times since 2021, they have had to borrow money to deal with the incessant plumbing, fixture and appliance repair and maintenance costs caused by sediment intrusion; the Wilsons recently replaced their refrigerator with its built in water tap, with their washing machine constantly malfunctioning and barely hanging on
- Inability to operate more than one bathroom at a time due to lack of water pressure, and reduced or impaired function of cold water drawn directly from their wells

These and other harmful conditions were absent before Meta's construction of the Staton Springs Data Center. The Morris Family lived on their property for several years without incident from 2016 until your land-clearing work at the East Campus in late 2020. As for the Wilsons—they had just recently moved to their “dream” home in a secluded, wooded property in a quiet country atmosphere only months prior to commencement of your significant land disturbing activity.

The onset of these families' well contamination and the cascade of harms that followed mirrors the timing of deforestation, excavation, trenching, grading, blasting and construction activities at the Stanton Springs Data Center. In comparison, this timeline is inconsistent with seasonal groundwater/weather variability or natural fluctuations in groundwater levels, and is likewise inconsistent the effects of ordinary maintenance issues that all homeowners might encounter. Both families have incurred significant trouble and expense in their increasingly desperate respective bids to maintain basic household functions that involve clean, running water. The timeline of harms detailed above, experienced almost simultaneously by the Morris and Wilson families, is consistent with the introduction and movement of disturbances of nearby

subsurface soils within a shallow aquifer – the very conditions that exist along and beneath Sewell Lane and these families’ homes.

i. Sediment Observed in the Wells is Consistent With Soils from Meta’s Site

The reddish fines and sediment accumulating in these families’ water systems match the color and texture of the exposed red-clay soils on Meta’s construction site. While surface runoff into roadside ditches demonstrates that Meta’s disturbed soils are mobilized and moving downstream, these same fines are moving downgradient in the aquifer and are appearing inside the Morris’ and Wilsons’ wells and household plumbing/water lines — clear indications of subsurface transport of these pollutants from your site, and not merely surface discharges of your sediment (which is visible to the naked eye, as shown in [Figure 6](#), [Figure 7](#), [Figure 8](#), [Figure 8A](#), and [Figure 8B](#) above).

As they draw in water from the aquifer, the Morris and Wilson wells are intercepting large concentrations of Meta’s sediment in groundwater at depth. As their pre-purchase home inspections independently demonstrate in 2016 (Morris) and in 2020 (Wilson), this condition that did not exist until Meta disrupted the aquifer by leveling hundreds of acres, blasting into bedrock, trenching, and constructing its massive industrial site with manifestly improper perimeter containment or site control that would otherwise prevent it from unleashing masses of sediment into the water table, and in stormwater discharges.

ii. Construction-Related Disturbances to the Aquifer

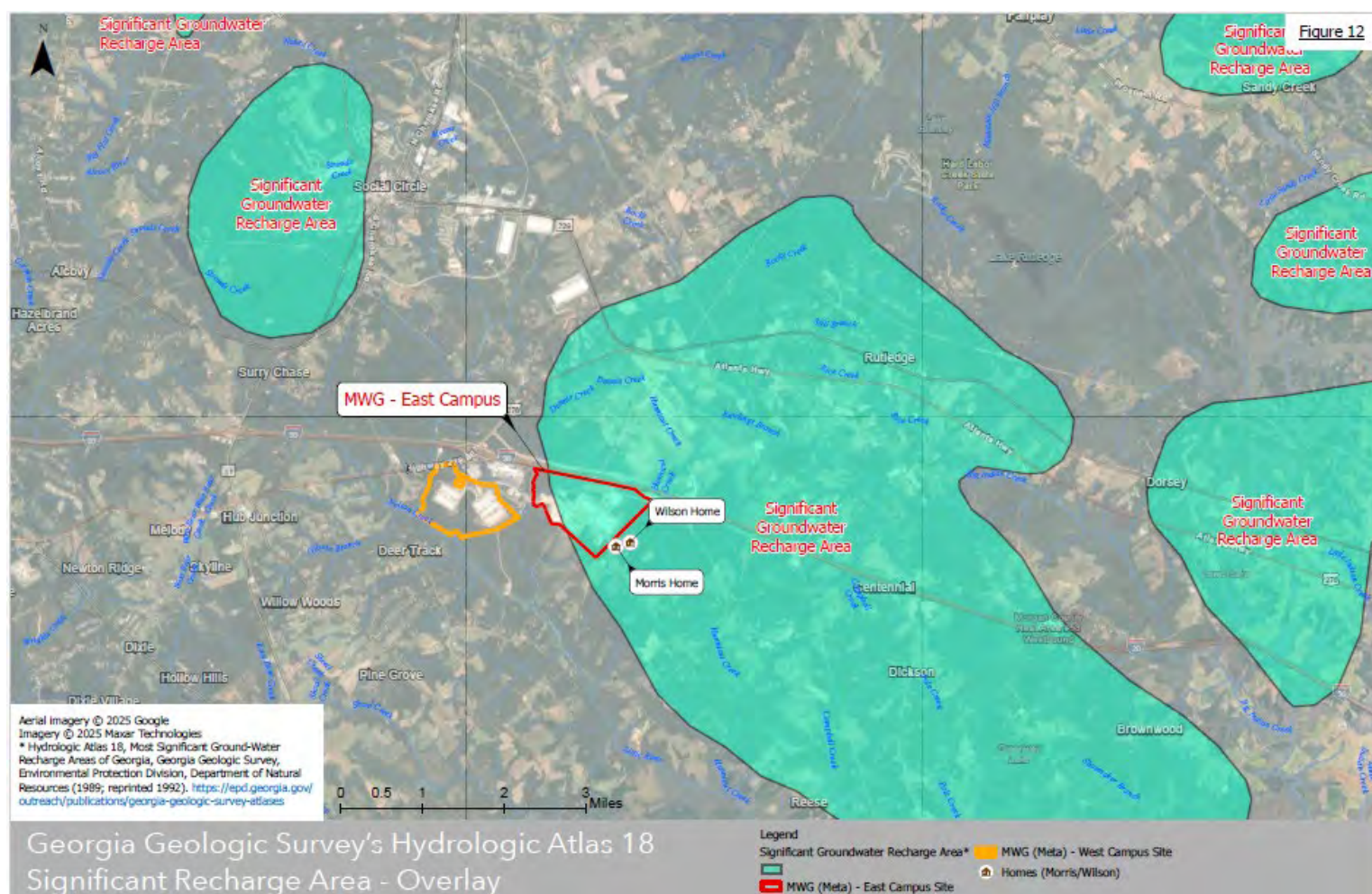
Meta’s deforestation, blasting, grading, deep excavation, heavy equipment loading, and extended hydro-excavation trenching likely created repeated mechanical disturbances to the shallow aquifer system, which explains the harms they have been sustaining for the very timeframe that fits the Stanton Springs development sequence set out above. Rapid deforestation and removal of topsoil to below the previously-existing root structure, excavation and grading increases surface water and rainfall infiltration as well as sediment migration into the aquifer, given that the forest and dense vegetation that once existed there has been erased.

Blasting—removing roughly 155,000 cubic yards of rock and dirt — can open fractures, increase hydraulic connectivity, and mobilize sediment over considerable distances. The level of your blasting to develop Stanton Springs is *substantial*. For context, 155,000 cubic yards of bedrock is equal to roughly 4.2 million cubic feet, or enough to fit a 17-story office tower occupying a 25,000 footprint. That is enough blasted rock and dirt to fit roughly the size of the Candler Building in downtown Atlanta, which is 17-stories high.

Seismic activity at such a scale within little more than a mile from these properties is more than enough to significantly alter the subsurface. Months of vibration from cranes, compactors, loaded trucks, and foundation work could further loosen and mobilize fines and alter subsurface flow paths. These disturbances, taken together, provide a direct and foreseeable mechanism for sediment migration into nearby groundwater wells, such as those on the Morris and Wilson properties.

iii. Recharge-Area Vulnerability of Aquifer

As shown in Figure 12 below (and attached), the East Campus and the Morris and Wilson properties all sit within a “Most Significant Ground-Water Recharge Area” as formally mapped by the Georgia Geologic Survey in Hydrologic Atlas 18. ² Such designations are “those regions likely to have the greatest vulnerability to pollution of ground water from the surface and near surface activities of man.” ³ In this particular region of Georgia, the shallow aquifer system is replenished primarily through thick, permeable soils that allow rainfall to infiltrate vertically (top down) into the fractured-rock groundwater system supplying these homes. These soils are the aquifer’s protective and functional interface: they regulate infiltration, stabilize fines, and maintain the clarity and reliability of the groundwater entering domestic wells.

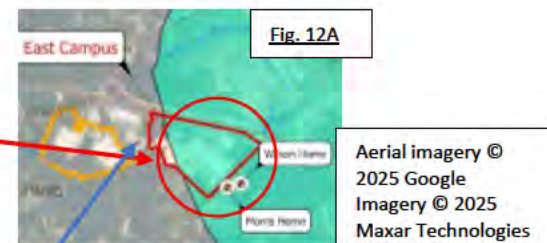


² Hydrologic Atlas 18, Most Significant Ground-Water Recharge Areas of Georgia, Georgia Geologic Survey, Environmental Protection Division, Department of Natural Resources (1989; reprinted 1992). <https://epd.georgia.gov/outreach/publications/georgia-geologic-survey-atlases>

³ See *id.* (“WHAT ARE RECHARGE AREAS?”)

When construction of Meta's East Campus removed the vegetative cover, stripped away soil, blasted bedrock, and opened large areas of disturbed earth, it directly altered the natural recharge process operating in this designated zone, shown in Figure 12 (green). Disturbance of significant-recharge soils can reasonably be expected to increase the downward migration of fine sediment, contribute to turbidity pulses after storms, and alter flow paths into the shallow aquifer. These effects mirror precisely what the Morris and Wilson families are experiencing: red-clay fines in their well water, repeated filter clogging, reduced pressure, and turbidity events following storm activity from your blasting, trenching, excavation/construction and inadequate controls or safeguards.

Figure 12 illustrates this clearly. The **East Campus** footprint and the **Morris** and **Wilson** properties all fall **squarely within** the mapped "Most Significant Ground-Water Recharge Area" (green shaded region, Fig. 12A). In this Georgia-designated significant recharge area, a large-scale land-disturbing project of Meta's magnitude at Stanton Springs does not simply reshape the surface; it destabilizes the very materials through which groundwater enters and moves about the aquifer. Once disturbed, these soils can readily transmit fine sediment downward, and the downgradient wells (Morris and Wilson) become the receivers of that sediment. Now disturbed, this condition and the pollution it has unleashed will continuously encroach upon the Morris and Wilson wells and the properties on which they sit. Your **explosives blasting** is believed to have occurred just outside and to the west of this portion of Georgia's Most Significant Ground-Water Recharge Area, which likely seismically impacted the regions within this sensitive Recharge Area.



These features reinforce the other factors detailed above as to timing, proximity, downgradient alignment, and the observed sediment impacts sustained by both the Morris and Wilson families shortly after substantial land clearing at the East Campus began. Put simply, Meta's construction activity occurred in a location where the aquifer is inherently sensitive to disruption (a Most Significant Ground-Water Recharge Area), and the resulting contamination of both domestic wells by sediment disturbed by that construction activity is entirely consistent with the disturbance of this significant-recharge system, wherein you used explosives to develop the site just outside of that system.

The harms to their wells and connected fixtures, plumbing and appliances that the Morrises and Wilsons have endured was foreseeable, and was actually foreseen, given your selection of the East Campus site for large-scale deforestation, trenching, and excavation despite Georgia's designation of this zone as having "the greatest vulnerability to pollution of ground water from the surface and near service activities by man."

iv. Result: Ongoing, Worsening Groundwater Contamination

What had been stable, reliable drinking-water systems for these homes are now chronically impaired. The Morris and Wilson wells continue to deliver sediment-laden water drawn from the now-polluted aquifer; pressure and flow remain diminished, with water lines and fixtures impacted by sediment; filters and appliances such as washing machines fail prematurely

or malfunction; and the families must make continuous household adjustments to account for the nuisance and inconvenience imposed by sediment-laden water entering their homes. *See Figure 13 and Figure 14* below (recent and ongoing Wilson and Morris groundwater well impacts).

The Wilsons' Well Impacts



The Wilson family has endured malfunction or failure of multiple appliances that use water, necessitating replacement of their water heater, frequent water filter changes, and repeated repair expenses to address sediment-impacted internal pipes and infrastructure. Plumbing visits provide temporary relief, only for reduced function to return after continual sediment intrusion. Lack of cold water pressure, drawn from a well that is mired with sediment, is now a constant headache, and mirrors the situation faced by the neighboring Morris family. The Wilson family must often suffer the indignation of timing showers and bathroom visits amongst themselves due to perpetual low water pressure, placing them in the unenviable position of deciding between running their washing machine, or allowing their son to take a shower, for example. Multiple systems in the home that rely on water are malfunctioning due to the continual introduction of sediment and “muddy water,” despite the relatively new age of these systems, initially installed in 2016. The Wilson’s replacement washing machine, purchased in 2018, constantly reports error messages tied to its water supply, exhibiting strain from sediment-polluted supply lines. Any

reservoir of water, such as bathwater, or toilet tanks exhibit the telltale brown, sediment-laden characteristics directly tied to well pollution from the now-impaired aquifer. These impacts were first observed in late 2020, with their effects increasing over time, and have plagued their home since.

The Morris' Well Impacts



Shortly following your mass grading and construction activity at Stanton Springs, the Morris' must likewise contend with the perpetual burden and inconvenience of low water pressure due to impaired water line function, seeking temporary relief only after disconnecting their water lines, and physically air blasting the interiors to dislodge sediment build up. (See, e.g., Figure 14, above; sediment-laden water extracted from water supply line air blasted to clear the line, dated Oct 12, 2025). As the Morris' were adjusting to their newly experienced plight, their 2.5 bedroom home was functionally reduced to one bathroom, at times requiring use of a bucket to generate enough water pressure to flush their toilets. Their kitchen sink essentially ceased supplying cold water, requiring perpetual bucket trips to provide enough water to perform basic household tasks, such as rinsing dishes or preparing food.

At various points in time, it was discovered that their son's bathroom ran mostly hot water drawn from their water heater reservoir, resulting in scalding due during showers because of insufficient cold water supply in that bathroom. In a desperate bid to restore basic plumbing

functions in their home, the Morrisses shut off all of their water, again air blasted the supply lines to clear them of sediment, and replaced sections of their plumbing and fixtures to remove portions impacted by sediment. They've endured this anxiety inducing, highly inconvenient and demoralizing situation since at least 2023. To combat these issues, the Morrisises spent thousands of dollars to repair or replace their interior pipes, fixtures, and water appliances, having to borrow money at times to do so. These repair and mitigation measures are merely a temporary respite until the sediment that now permeates the aquifer under their home intrudes once again.

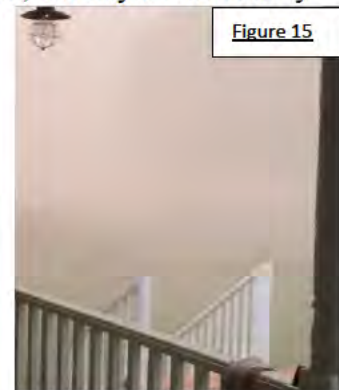
All of these impacts are consistent with a disturbed aquifer transporting fine sediment from the East Campus site to the nearby wells and properties, and was entirely foreseeable given the size, scope, nature, and duration of your site development, land disturbing, construction activity and ongoing operation, ownership, and control over the Stanton Springs site.

C. Dust, Light and Noise, Vibration Nuisance

After the land deforestation and grading removed the vegetative buffer, these families became exposed to industrial-scale dust, noise and illumination from the East Campus.

i. Dust

Meta's mass grading and deforestation left large areas of exposed red clay susceptible to wind erosion, caused by your continual failure to implement proper dust control and perimeter containment at the site, whereon work took place over months and years, not days. Particularly

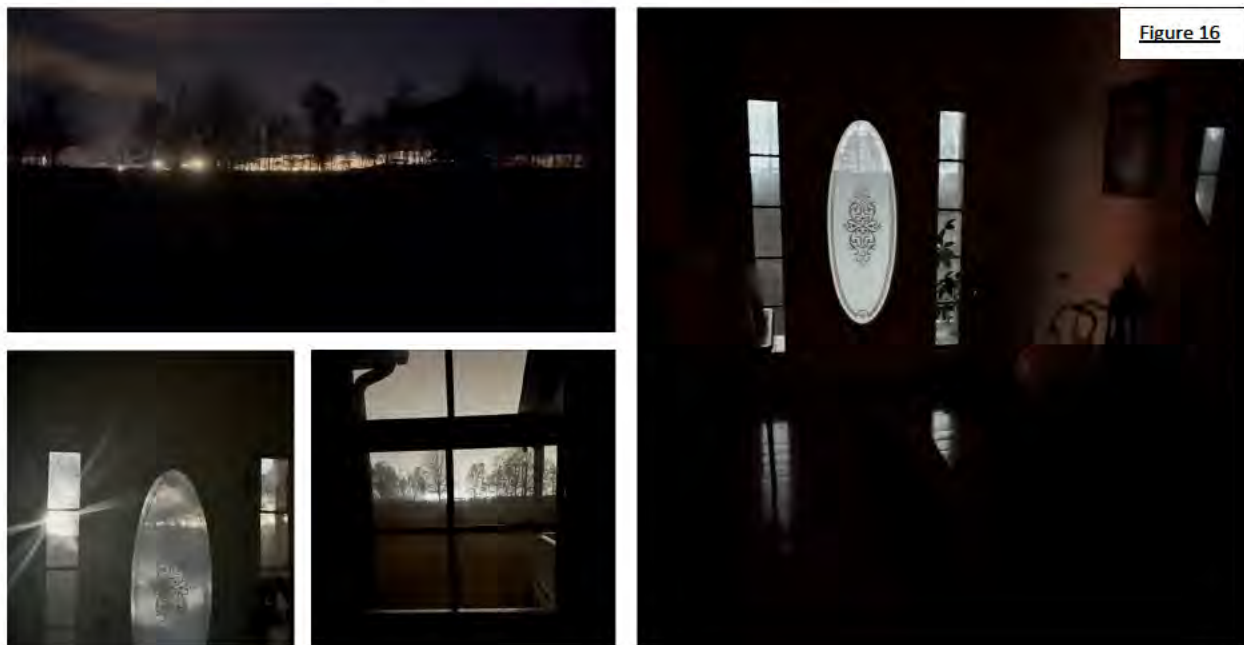


during active construction in 2021 – 2022, dust from these disturbed soils repeatedly migrated off the East Campus and settled onto the Morris and Wilson properties. The families documented dust clouds crossing Sewell Lane, coating porches, vehicles, outdoor furniture, and household surfaces, exposing them and their animals to your construction pollution. On multiple occasions, airborne particulates were dense enough to reduce visibility and force the families indoors.

HVAC filters clogged with unusual frequency, overwhelmed with high volumes of fine dust infiltrating their homes and interior air. The Wilsons recently replaced their HVAC unit prematurely, likely due to increased stress placed on the system having to contend with these impacts. These dust conditions did not occur before Meta's large-scale land disturbance across Sewell Lane. See [Figure 15](#), June 17, 2022 and August 9, 2022 dust impacts.

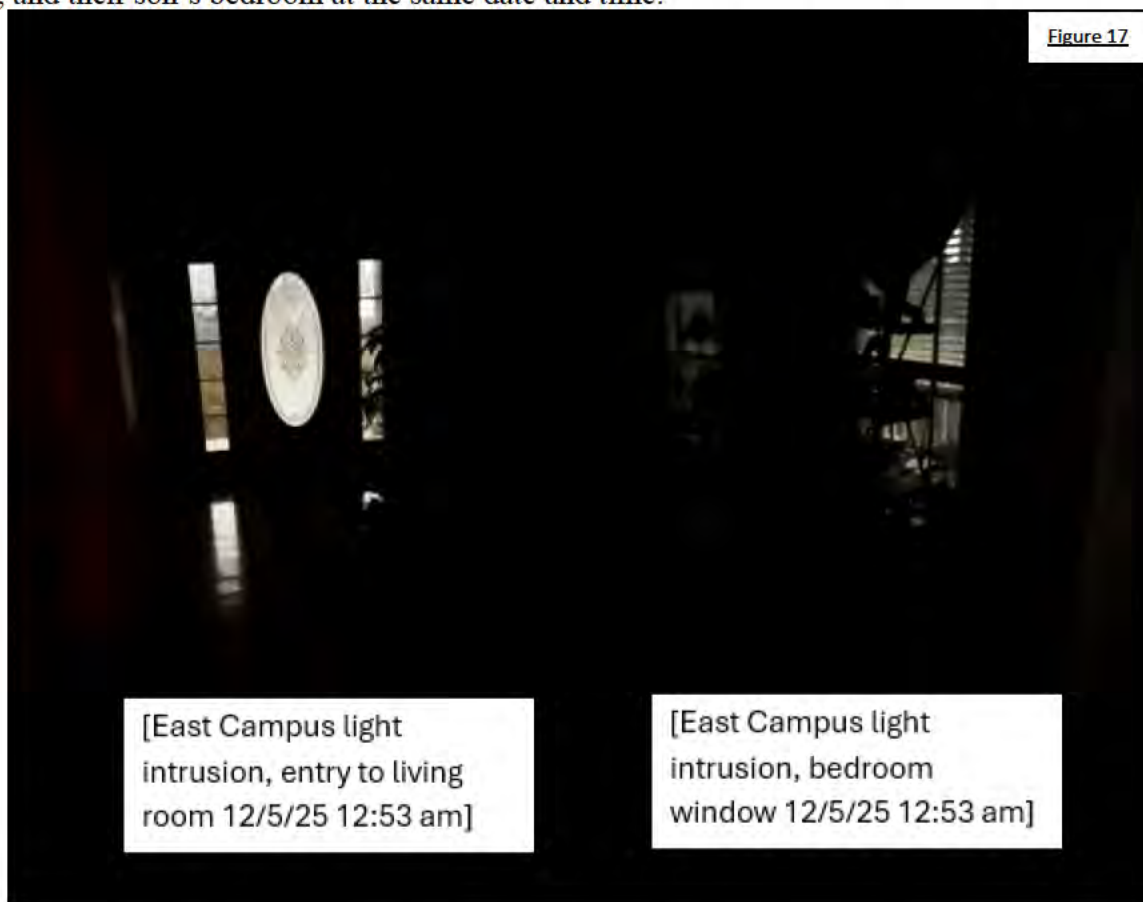
ii. Light pollution

With no tree cover remaining at the East Campus, Meta's elevated, high-intensity exterior lighting projects directly into the Morris home, illuminating living spaces and bedrooms throughout the evening. These lighting patterns are inconsistent with rural-residential use and are a continual disruption to the quiet enjoyment of the property. [Figure 16](#) shows the interior of the Morris home on January 24, 2024 (1:54/1:53 am); and May 8, 2025 (9:19 pm), and your unreasonable light intrusion from the East Campus.



Any purported mitigation measures you have undertaken in 2025 have failed to limit the unreasonable incursion of light into the Morris home after dark. [Figure 17](#) below shows the interior of the Morris home in the *middle of the night*, wherein your East Campus industrial lighting continues to intrude into their windows, including their living room and son's bedroom.

Figure 14 shows the Morris interior entryway to the living room on December 5, 2025 at 12:53 am, and their son's bedroom at the same date and time:



Prior to the development of Stanton Springs, the stars were visible in the clear night sky, with no artificial light intrusion in their windows after dark. Today, the East Campus artificially and unreasonably subjects their home to persistent lighting well beyond normal operational hours. Your nighttime illumination exceeds levels necessary for any reasonable purpose that might justify the annoyance and inconvenience imposed on the Morrises, creating an avoidable, continuous and foreseeable light trespass and nuisance. During overcast or cloudy evenings, the East Campus lighting is *worsened* in comparison with the conditions shown in Figures 16 and 17. Fog, cloud conditions or low-lying mist act as light reflectors off the intense exterior lighting system at the East Campus, creating an even brighter, uniform skyglow extending from your industrial park directly into the Morrises home after dark.

iii. Noise

The absence of tree cover and sound barriers at the perimeter of the site renders the massive industrial complex both a source of noise, and a ready conduit of increased traffic noise

from Interstate 20. Power generators, alarms, heavy equipment, and cooling infrastructure produce sustained sound levels far exceeding normal rural-residential expectations at Stanton Springs, disturbing the Morris and Wilson families' reasonable expectations of quiet enjoyment of their homes. The families recorded high-pitched alarms, loud generator noise late at night and during the day, and persistent daytime vibrations from construction and ongoing operations of the East Campus. Currently, the Morrisises, whose home is roughly 1,000 feet from your site, experience a battery of electromechanical noises from the East Campus often resembling a continual "hum," punctuated by periods of increased noise activity when the generators kick in.

The construction and operation of your hyperscale data center across the street presents a clear and present threat to the health and well-being of the Morrisises and Wilsons due to the threat of pervasive low frequency noise (LFN) and vibrations. Unlike noise that is readily audible to the human ear such as highway traffic, data center noise can generate perpetual LFN, exposing nearby residents to a significant nuisance. Because data centers generate massive amounts of heat, they must use an array of equipment such as industrial chillers, and banks of cooling fans, all of which can run for extended periods around the clock. These devices, alone or in combination, often emit a low-frequency "hum" or "drone" that operates at frequencies that aren't perceived by the human ear, but can inflict lasting harms on neighboring residents. LFN readily penetrates walls and structures, and is capable of causing significant, non-auditory human health effects even at low decibel levels.

These families never consented subjected to industrial scale LFN from the East Campus, from which they cannot escape. The Morrisises and Wilsons are highly concerned about negative health impacts associated with the chronic LFN and vibration exposure to which they are likely subjected as a result of the East Campus operations, and question whether you have undertaken sufficient safeguards in the design, construction, and operation of the East Campus to properly assess and eliminate harmful LFN emissions into their homes. Both families have experienced severe sleep disruption and migraine headaches, as well as increased stress and anxiety following construction and initial operation of the East Campus, which has diminished and degraded their quality of life. These emissions constitute a private nuisance and a trespass that you are obligated to prevent and mitigate.

D. Nuisance, Trespass from Electrical Power Disruption, Displaced Wildlife

Beyond the well contamination and the dust, audible noise, LFN, and light pollution described above, these families have endured substantial additional disruptions to the quiet use of their properties. The Wilsons now must contend with ongoing, highly disruptive electrical instability that occurs without warning and that routinely causes the home's breaker panel to trip – a function used to protect their household circuits from damage. Each incident forces them to reset their breakers, often several times per week, prompting a reasonable fear of an unsafe, and certainly annoying and inconvenient home environment. For their part, the Morrisises have experienced a similar loss of electrical power since your site operations at the East Campus began. The repeated loss or intermittent changes to the electrical power supply, including repeated tripping of the Wilson's electrical panel, underscores that the home's electrical infrastructure is likely being stressed beyond its intended operation conditions from an unstable

power source. As a result, these families are left with a reasonable fear of permanent electrical failure or damage to their appliances, compromised safety, and further degradation of property value.

The large-scale deforestation and construction activity displaced wildlife into the surrounding residential area, leading to pet injuries, suffering and deaths, as well as recurring encounters with wild animals that had not previously appeared on their land. The Morrisises have lost their beloved pet Beagle mix to a venomous snake bite shortly following your land-clearing activity in the winter of 2022, and the Wilsons have lost multiple pets to predation from wild animals in the same timeframe.

Individually, each of these impacts has diminished the families' ability to use and enjoy their homes. Taken together, they amount to an ongoing and substantial nuisance.

E. These harms are a continuing nuisance and trespass that must be abated

As the above shows, Meta's development has adversely impacted the groundwater supplying these homes, unreasonably interfering with the Morrisises' and Wilsons' use of their groundwater wells. And these well and surface water impacts do not stand alone; the same land disturbing, construction and operation activities that destabilized and polluted the aquifer also generated intrusive dust plumes, persistent industrial noise, and high-intensity nighttime lighting; each of which has independently and cumulatively impaired the families' ability to use and enjoy their homes.

Your improper construction, development, and operation of the Stanton Springs Data Center, including each of the injuries, harms, and conditions detailed above constitute both a nuisance and a trespass. Under O.C.G.A. § 41-1-1 et seq., a nuisance includes any activity that unreasonably interferes with another's use and enjoyment of private property, regardless of whether the conduct occurs on an adjoining parcel. Likewise, Georgia trespass law, O.C.G.A. § 51-9-1 et seq., recognizes that a physical invasion of land can occur through subsurface intrusion, including the migration of soil, fluids, silt, sediment, vibrations, dust, noise, light, and other disturbances generated by construction activity. The conditions described herein are both a nuisance and a trespass, and continue to harm the Morris and Wilson families on a daily basis.

As set forth above, your explosive blasting performed at least in March 2024 approximately 1.1 miles from the affected homes consisted of the removal/disruption of at least 155,000 cubic yards of rock and dirt. Georgia law has long recognized that blasting with explosives is a quintessential ultrahazardous activity that carries strict liability for all resulting harms, regardless of the degree of care exercised. This is true whenever vibrations, air blast, concussive forces, or related effects cause injury to nearby homes, wells, structures, or land. Blasting produces high energy shockwaves and ground vibrations that travel through soil and bedrock. In undertaking blasting to develop Stanton Springs, Meta (and its affiliated entities) and contractors assumed strict liability for all resulting impacts to adjacent residential properties, including disturbances of groundwater, sediment mobilization, well impairment, structural

vibrations, nuisance, physical displacement of soil or water, and the resultant harms sustained by the Morris and Wilson families as exhaustively set out in this letter.

Preservation of records

We are hopeful that the parties can find an amicable solution to these issues. Nevertheless, this letter is notice of your legal obligation to preserve all records relevant to this matter. If you fail to properly secure and preserve this evidence, it will constitute spoliation and give rise to a legal presumption that the evidence would have been harmful to your side of the case. This includes, but is not limited to

- Blasting report(s), including pre-blast report, drilling logs, post-blast records, and other documentation required by law concerning the blasting conducted at Stanton Springs in 2024 or any other blasting that occurred at or near Stanton Springs, including the West Campus and East Campus sites or nearby areas;
- Any correspondence, photos and videos, construction drawings, engineering plans, as-built records, inspection reports, applications, and permits relating to the Stanton Springs Data Center East Campus or West Campus, including but not limited to excavation / drilling records for the installation of fiber optic cables, underground pipes and infrastructure, slab foundation and erection of multi-story warehouse structures, and installation, maintenance and operation of surface water ponds / impoundments;
- Notes, memos, email correspondence, video recordings, audio recordings, or photographs relative to either the Wilson Property or the Morris Property, including any recordings of visits among representatives of Meta or contractors engaged on its behalf and Beverly Morris;
- Permits and permit applications relating to the East Campus, including land disturbing permits, construction permits, inspection records, and communications with regulators and agency representatives;
- Pre- and Post-construction surveys or Impact Assessments bearing on ambient light and noise for the East Campus, including assessments of Low Frequency Noise (LFN) and Infrasound, detailing low-frequency metrics assessed, LFN or vibration effects modeling, and mitigation measures considered or implemented, such as Acoustic Barriers or sound dispersion equipment or measures; and
- Records of maintenance of surface water ponds on the Stanton Springs East Campus, including memos, emails, letters, work orders/repair and maintenance logs related to any actual or suspected leaks or structural compromises to any surface water pond at the East Campus.

Conclusion

The harms sustained by the Morris and Wilson families are continuing. Given the enormity of the sediment, silt, disturbed soils and groundwater that is believed to be unleashed by the Stanton Springs development project across the street from their homes, these families quite reasonably expect that injuries to their property interests, as well as the hurt, annoyance and inconvenience they have sustained will continue unless and until you immediately take measures to abate and rectify the ongoing encroachment of the Morris' and Wilsons' land, air, surface water and groundwater.

The street address for Building 1 at the East Campus is 100 *Move Fast* Way, Social Circle Georgia, 30025. In taking this "Move Fast" approach, you have failed to undertake reasonable, proper accounting of the harmful impacts that Stanton Springs is having on its neighbors – the Morris' and Wilsons. Now is the time to cease these harms. In that vein, we look forward to working with you toward a prompt and amicable resolution of this matter, so that these families can be made whole and put an end to a saga that they neither asked for, nor deserve. Should you act promptly and in good faith, the Morris' and Wilsons are committed to doing the same.

Any correspondence regarding this matter should be directed to the undersigned counsel at the address set forth above. Please respond to this demand and request to schedule a meeting to discuss the means of ceasing these conditions and resolving these harms by no later than January 16, 2026.

Sincerely,



Christopher J. Bowers

cc: George Lott
Stacey Evans

Enclosures (appended figures)

Attachments

Figure 1

Figure 2

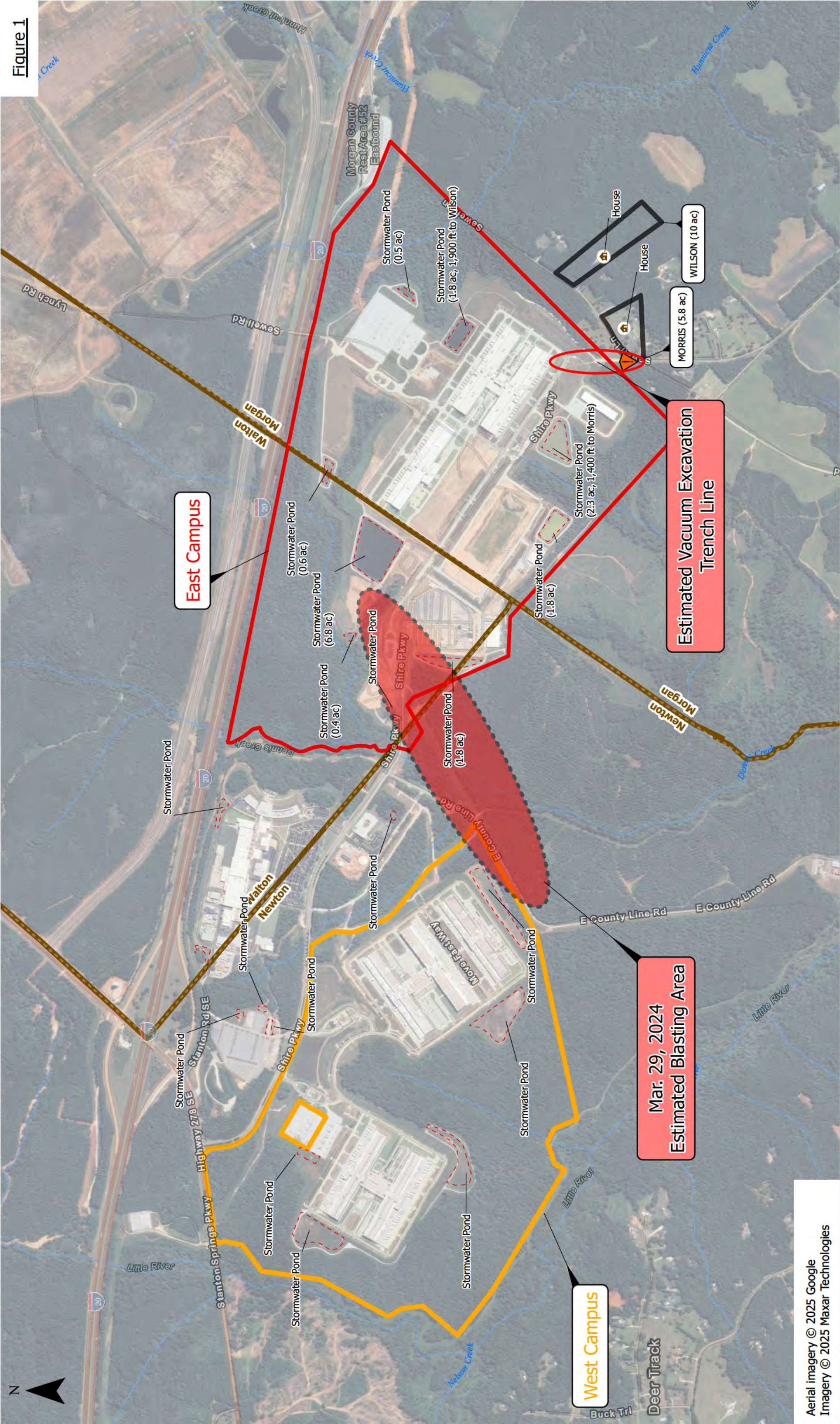
Figure 3

Figure 4

Figure 5

Figure 12

Figure 1



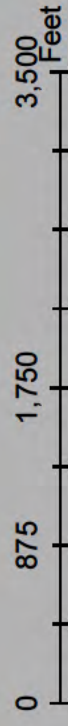
JAN 2018



Esri, Inc. (2025). World Imagery (Wayback) [Imagery layer].
Imagery acquisition date: Jan 2018.
<https://wayback.maptiles.arcgis.com/>

Meta Stanton Springs

Legend



- | | | | | | |
|---|------------------|---|---------------------|---|-----------------------|
|  | County Line |  | Resident Properties |  | Homes (Morris/Wilson) |
|  | East Campus Site |  | West Campus Site |  | Potable Wells |

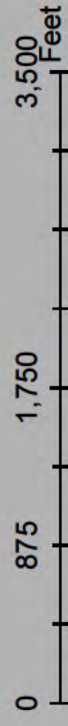
JAN 2022



Esi, Inc. (2025). World Imagery (Wayback) [Imagery layer].
Imagery acquisition date: Jan 2022.
<https://wayback.maptiles.arcgis.com/>

Meta Stanton Springs

Legend



Homes (Morris/Wilson)

Resident Properties

West Campus Site • Potable Wells

County Line

East Campus Site

Figure 3

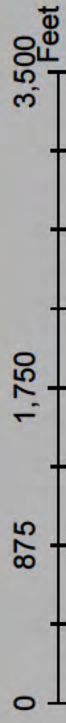
FEB 2023



Esri, Inc. (2025). World Imagery (Wayback) [Imagery layer]. Imagery acquisition date: Feb 2023. <https://wayback.maptiles.arcgis.com/>

Meta Stanton Springs

Legend



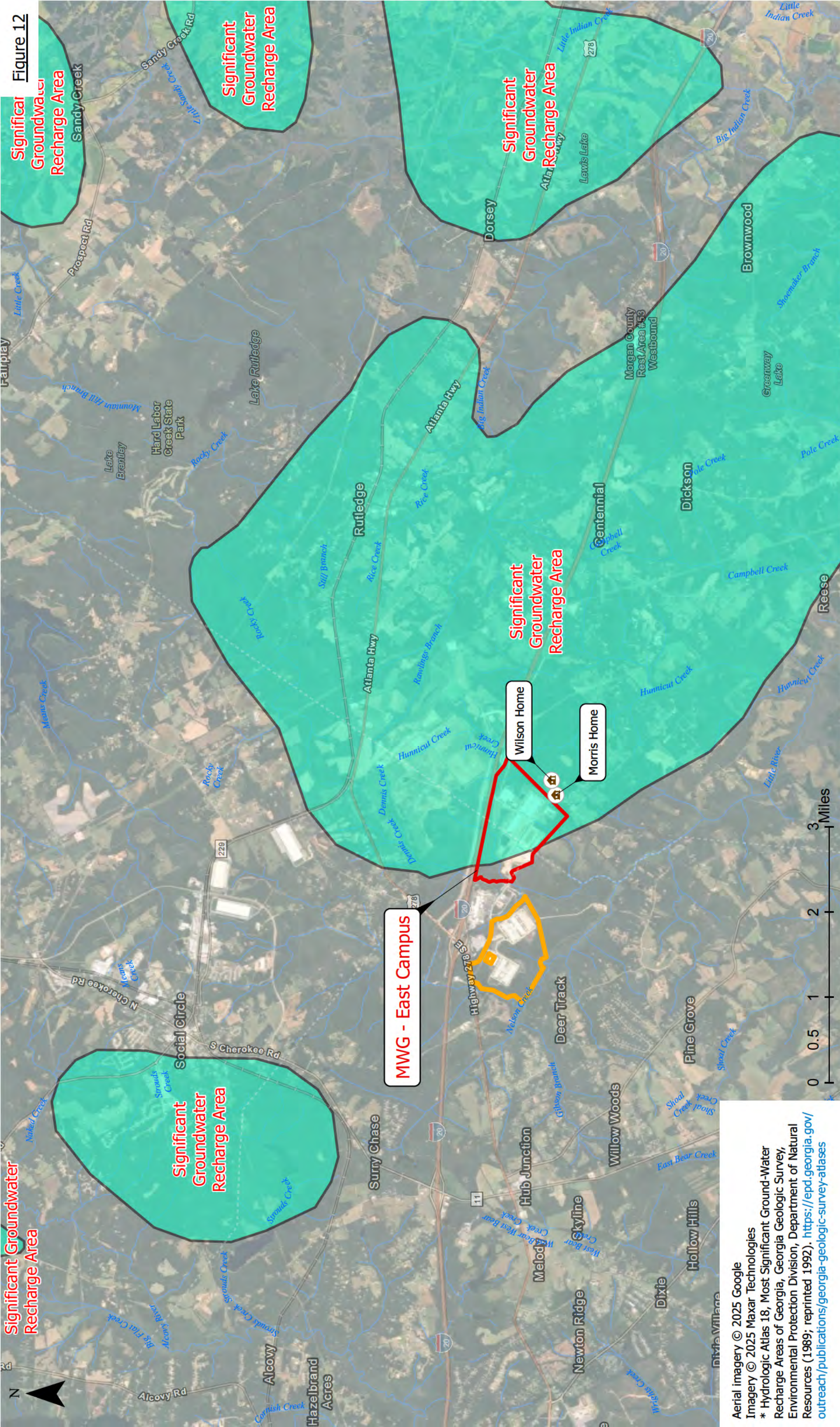
Homes (Morris/Wilson)

Resident Properties

West Campus Site • Potable Wells

East Campus Site

Figure 4



Aerial imagery © 2025 Google
Imagery © 2025 Maxar Technologies
* Hydrologic Atlas 18, Most Significant Ground-Water Recharge Areas of Georgia, Georgia Geologic Survey, Environmental Protection Division, Department of Natural Resources (1989; reprinted 1992). <https://epd.georgia.gov/outreach/publications/georgia-geologic-survey-atlases>

EXHIBIT C

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
■ Complete items 1, 2, and 3. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits.		A. Signature ☒ Agent ☐ Addressee	
1. Article Addressed to: Joint Development Authority of Jasper County, Morgan County, Newton County and Walton County Care of Andrea P. Gray, Esq. 300 E. Church Street P.O. Box 826 Monroe, Georgia 30655		B. Received by (Printed Name) Kaye Pickens C. Date of Delivery 2-23-26	
2. Article Number (Transfer from service label) 9589 0710 5270 3788 9571 98		D. Is delivery address different from item 1? ☐ Yes ☒ No E. Service type ☐ Adult Signature ☐ Adult Signature Restricted Delivery ☒ Certified Mail® ☐ Certified Mail Restricted Delivery ☐ Collect on Delivery ☐ Collect on Delivery Restricted Delivery	

PS Form 3811, July 2020 PSN 7530-02-000-9053



USPS TRACKING #	
ATLANTA GA RPDC 302 24 FEB 2026 AM 5 L 9590 9402 9310 4295 7871 46	
United States Postal Service	First-Class Mail Postage & Fees Paid USPS Permit No. G-10
• Sender: Please print your name, address, and ZIP+4® in this box • Evans Bowers 729 PIEDMONT AVE, NE ATLANTA, GA 30308 CJB	



CHRISTOPHER J. BOWERS
DIRECT DIAL: 404.850.6747
E-MAIL: cbowers@evansbowers.com

January 23, 2026

Via Certified Mail
9589 0710 5270 3788 9571 98
Joint Development Authority of
Jasper County, Morgan County, Newton
County and Walton County
Care of Andrea P. Gray, Esq.
300 E. Church Street
P.O. Box 826
Monroe, Georgia 30655

RE: Demand to Abate Continuing Nuisance and Trespass and Claim for Damages

Meta Stanton Springs Data Center

Joint Development Authority of Jasper County, Morgan County, Newton County and Walton County (or "JDA"):

This firm has been retained by Beverly and Phillip J. (Jeff) Morris, and Chris and Lindsay Wilson regarding past and ongoing damage to their interests in real properties in Mansfield, Georgia more specifically described as follows: approximately 6.4 acres at 1121 Sewell Lane, Mansfield GA 30055, Morgan County Parcel No. 014 032 ("Morris Property"); and about 10 acres at 1201 Sewell Lane, Mansfield Georgia 30055, Morgan County Parcel No. 014 035 ("Wilson Property").

Claimants present their claim for money damages and available equitable relief, including injunctive relief through this letter. As the owner of the property giving rise to the nuisance, trespass, injuries and property damage, the Morrises and Wilsons demand that the JDA take all necessary and appropriate steps to abate the sediment, silt, noise, light, and other discharges, and migration of pollutants onto their properties that have created a nuisance and trespass to and inverse condemnation of their properties without just compensation. This letter shall therefore also serve as the Morrises' and Wilsons' notice of a claim and request for abatement of nuisance and trespass under O.C.G.A. §§ 41-1-1 et seq., O.C.G.A. § 51-9-7, O.C.G.A. § 51-9-1, and other laws.

Description of the Claims

The self-stated goal of the JDA is “to create an industrial area to attract industry to the region.”¹ While it has apparently succeeded in doing so, it has been at the expense of residents whose lives have been upended, and their property values diminished by the manner in which the JDA has exercised ownership over these properties in service of goal. The Morris Property and the Wilson Property are located across Sewell Lane from a rural, hyperscale data center known as the “Meta Stanton Springs Data Center” on land owned and controlled by the JDA.

The cause of the Morris’ and Wilsons’ damages, and the JDA’s role in it, entails the actions that the JDA has taken in advance of its above-stated goal that is directly causing a nuisance, and trespass onto the Morris Property and the Wilson Property which has substantially decreased their property values, diminished their use, enjoyment, functionality of their homes, drinking water sources, appliances, electrical systems, plumbing and fixtures, and other aspects of living on their properties. The JDA has inflicted these harms on the Morris’ and the Wilsons by actively participating in siting, creating, maintaining, directing, and controlling the cause of these continuing harms on land owned by the JDA known as the Meta Stanton Springs Data Center East Campus and West Campus, as more fully described in that certain letter from this office addressed to Meta Platforms, Inc. Morning Hornet LLC, Baymare LLC, and Meta Stanton Springs dated December 16, 2025, attached hereto as Attachment 1 (hereinafter, the “*Morris Wilson Demand letter to META*”).² The *Morris Wilson Demand letter to META* is incorporated herein by reference as to the JDA.

As detailed in the *Morris Wilson Demand letter to META*, the Morris’ and Wilsons’ claims arise from extensive damage to their properties and their interests in said properties caused by the JDA’s acts and omissions related to its ownership, development, maintenance and control over the properties where the Meta Stanton Springs Data Center now exists, including the following:³

[next page]

¹ <https://www.i20jda.com/about.html> (accessed January 23, 2026)

² These entities are collectively referred to herein as “Meta.” The reference to Interstate “75” in the *Morris Wilson Demand letter to META* is corrected to refer to Interstate 20 in the attached.

³ Other parcel numbers associated or which may be associated with these developments include Morgan County Parcel No. JDA 002, Parcel No. JDA 003, Parcel No. JDA 004, Parcel No. JDA 005, Parcel No. JDA 006, Parcel JDA 007, Parcel No. JDA Parcel 008, Parcel No. JDA Parcel 010, Parcel No. JDA 011, Parcel No. JDA 013, Parcel No. JDA 014, Parcel No. JDA 015, Parcel No. JDA 016, and Parcel No. JDA 017; each of which reflect zero (“0”) acres, but list as the Owner the Joint Development Authority, 13944 HWY 278, Social Circle GA 30025. Additional parcels associated with or which may be associated with these developments include Newtown County Parcel No. 0134 005.

Meta Stanton Springs East Campus

Morgan County Parcel No. 013 044 (or JDA
Tract 4), 566.52 acres, more or less

Where a JDA creates a trespass upon or creates, maintains, or controls a nuisance that damages private property to the extent that the damage could be considered a taking of that property, then the JDA may be held liable for damages that would be recoverable in an action for inverse condemnation. By the JDA's affirmative actions and failures to act, it has taken the Morris Property and Wilson Property for a public purpose without payment of just and adequate compensation. The JDA's intentional and negligent conduct in creating and maintaining a nuisance has caused uncompensated damage to the Morris Property and the Wilson Property. The 5th Amendment to the U.S. Constitution, as applied to the states through the 14th Amendment of the same, prohibits the taking of private property for a public purpose without payment of just compensation. The more restrictive Georgia constitution, at Article I, § III, ¶ 1(a) states that "private property may not be taken or damaged for public purposes without just compensation being first paid."

Without admitting that such Ante Litem notice is required for recovery and relief as to the JDA, this Notice and Demand is also provided pursuant to O.C.G.A. § 36-33-5 (applicable only to a "municipal corporation"), O.C.G.A. § 36-11-1 (applicable to counties), and any and all other applicable statutes of the official Code of Georgia. This notice complies with all requirements of these statutes. Under Georgia law, these ante litem notice statutes must be strictly construed and do not extend beyond their plain and explicit terms, and Joint Development Authorities are not explicitly identified in either of these statutes. Hence, no ante litem notice under these statutes apply to the JDA and the Morris' and Wilsons' claims and demands made herein. Nevertheless, if you contend this notice, or service of this notice, is required but does not comply with the formal requirements of O.C.G.A. § 36-33-5 or O.C.G.A. § 36-11-1, please advise immediately; otherwise, I will assume that you have waived any defense based upon non-compliance with the statutes, to the extent they may apply.

Similarly, pursuant to O.C.G.A. § 36-33-5(b)'s requirement that the claim presented set forth "as nearly as practicable" the time, place, and extent of the injury, and the negligence which caused the injury, the Morris' and Wilsons have documented pollutant discharges and other intrusions, nuisance, trespass and injuries to their properties, as well as their peace and enjoyment of their properties on numerous occasions detailed in the *Morris Wilson Demand letter to META*. Likewise, the place of their injury is the Wilson Property and the Morris Property, including the residential homes where they live, consume water, sleep, and otherwise attempt to carry out their lives. The extent of the injury, that is, the nature, character, and particulars thereof, is as described in the *Morris Wilson Demand letter to META*. The JDA's negligence, as well as intentional conduct is as described in the same, consisting of the ownership, and control of the real property on which the Meta Stanton Springs Data Center sits, and active participating in the cause of the harms sustained by the Morris' and Wilsons, including the JDA's active participation in the siting and development of the Meta Stanton Springs East Campus, the improper and negligent development, land-clearing, mass grading,

rapid deforestation with improper stormwater and sediment / erosion controls, siting, blasting, excavation, grading, and subsurface drilling thereon which have caused the harms detailed in Attachment 1. Similarly, the JDA's negligence extends to intrusive light pollution it is allowing to occur and over which it continues to assert control on and from the East Campus property, as well as its lack of effective controls imposed on Meta's East Campus operations relating to the threats posed by low frequency noise (LFN) and vibrations detailed on page 19-21 of the *Morris Wilson Demand letter to META*. If you contend that this notice fails to provide you enough information to enable you to conduct an investigation to determine if the claim should be settled without litigation, please immediately identify the additional information you contend is necessary for you to conduct such investigation.

If we are forced to file a lawsuit against the JDA to obtain appropriate relief, we will seek an injunction or other relief requiring it to abate the nuisance detailed herein as well as all available monetary relief including indemnity and damages for the full extent of the injury to the Morris Property, the Wilson Property, taking, inverse condemnation, attorneys' fees, expenses of litigation, and damages for aggravation, annoyance, inconvenience, and discomfort. The Morris' and Wilsons' causes of action will include claims of nuisance, trespass, negligence, negligence per se, inverse condemnation, taking, unjust enrichment and payment of the these families' costs, expenses of litigation, expert fees, and attorneys' fees.

At least as of the date of receiving this notice and demand, the JDA has had notice of the situation, the danger it posed to the Morris' and Wilsons, and the hazards it created. If these harms are not rectified within 30 days from the date of this letter, the JDA will have with knowledge and intent failed and refused to correct the issues, despite an opportunity to do so. By the JDA's intentional and negligent conduct described above and in the enclosed *Morris Wilson Demand letter to META*, the JDA created, maintained, and controlled a dangerous condition by ownership of the real property on which the Meta Stanton Springs Data Center is located which directly caused and contributed to the hurt, inconvenience, and injury complained of herein. For these same reasons, the JDA will have acted in bad faith, been stubbornly litigious, and has caused the Morris' and Wilsons unnecessary trouble and expense, for which it should be required to pay the Morris' and Wilsons expenses of litigation including attorney's fees pursuant to O.C.G.A. § 13-6-11.

The JDA's zeal to "attract industry to the region" should not come at the expense of the Morris and Wilson families' use and enjoyment of their properties. These families simply want a basic right to clean, safe water, a restoration of their homes and the reasonable use of the pipes, fixtures, appliances, electrical and infrastructure systems (including their HVAC systems), and a reasonable degree of air purity, absence of intrusive light in the evenings, and a life free from unreasonable LFN and vibration intrusion. They also seek damages for the harms they've sustained, as detailed in the attached letter. In keeping with these basic rights to secure for themselves a right to live their lives in peace on their own properties, the Morris' and Wilsons remain committed to negotiating in good faith with the JDA to try to resolve this dispute without resort to litigation. Thus, the Morris' will accept \$3,000,000.00 (three million) to settle their

claims against the JDA. Separately, the Wilsons will accept \$3,000,000.00 (three million) to settle their claims against the JDA. Without admitting that such Ante Litem notice is required for recovery and relief as to the JDA under O.C.G.A. § 36-33-5, upon the presentation of this Notice and Demand, the JDA shall have thirty (30) days to respond to the Morris and Wilsons' demand to consider and act upon the claim.

This office submitted a Georgia Open Records Act request to the JDA dated July 21, 2025 concerning the Stanton Springs Development, and soon amended and refined the request by letter dated July 23, 2025. The initial open records act request was further narrowed and refined on August 8, 2025, and October 1, 2025, in what was initially a cooperative process with the JDA. Ultimately, following an explanation by the undersigned that woefully few records appeared responsive to the records requests that were narrowly tailored to the East Campus, and particularly given the technical nature of the requested records and information, the undersigned requested a date for a phone conversation or video call to discuss the search process in the hopes of arriving at a means by which the requestor may assist in identifying and retrieving responsive records by email dated October 17, 2025. Hearing nothing, the undersigned followed up by email again on October 24, 2025. To date, this office has not received a response to these good faith attempts to work cooperatively to search for, identify, and retrieve responsive records. As noted in these follow up communications, a reasonable review of the records produced to date indicate that the Joint Development Authority produced little more than *one* document that appeared responsive to the undersigned's (continually narrowed and refined) open records requests concerning the Meta Stanton Springs "East Campus," despite numerous efforts to narrow the scope and assist in the search and retrieval process.

Under the Georgia Open Records Act, O.C.G.A. § 50-18-71, public agencies such as the JDA must conduct a good-faith, reasonable search in all locations where responsive materials are likely to exist. The undersigned continues to hope that there is a reasonable explanation or continued silence in response to requests to confer as detailed above. If no records exist after such a conversation, so be it. However, the failure to even respond to good faith attempts to meet and confer on these matters would fall below the standard imposed by the Georgia Open Records Act, and is greatly disappointing.

In light of the foregoing, and given the urgency of the harms detailed in the *Morris Wilson Demand letter to META*, we are notifying the JDA of its obligation to preserve all evidence relevant to this matter, including records in the JDA's possession, custody or control relating to the Meta Stanton Springs Data Center, including the West Campus and the East Campus. This obligation extends to all records described on page 21 of the *Morris Wilson Demand letter to META*. If you fail to properly secure and preserve this evidence, it will constitute spoliation and give rise to a legal presumption that the evidence would have been harmful to your side of any case related to these matters. Likewise, we reserve the right to pursue legal action and obtain appropriate relief under the Georgia Open Records Act. The JDA's months-long silence in response to this office's requests for a simple phone conversation in attempts to search for and retrieve responsive public records, even narrowly tailored, may also

Joint Development Authority of
Jasper County, Morgan County, Newton County and Walton County
January 23, 2026

Page 6

serve as additional evidence of bad faith for purposes of the instant Demand to Abate and Claim for Damages, as well as any civil legal proceedings that may follow.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris Bowers", with a stylized flourish at the end.

Christopher J. Bowers

cc: George Lott
Stacey G. Evans

Enclosure

Attachment 1

Evans | Bowers

CHRISTOPHER J. BOWERS
DIRECT DIAL: 404.850.6747
E-MAIL: cbowers@evansbowers.com

December 16, 2025

Via Certified Mail

9589 0710 5270 3788 9569 62

Meta Platforms, Inc.

c/o Corporation Service Company
2 Sun Court, Suite 400
Peachtree Corners, GA 30092

Via Certified Mail

9589 0710 5270 3788 9569 86

Baymare LLC

c/o Corporation Service Company
2 Sun Court, Suite 400
Peachtree Corners, GA 30092

Via Certified Mail

9589 0710 5270 3788 9569 79

Morning Hornet LLC

c/o Corporation Service Company
2 Sun Court, Suite 400
Peachtree Corners, GA 30092

Via Certified Mail

9589 0710 5270 3788 9569 93

Meta Stanton Springs

Building 1
100 Move Fast Way
Social Circle, Georgia 30025

RE: **Demand to Abate Continuing Nuisance and Trespass to Property of Beverly and Jeff Morris, Chris and Lindsay Wilson in Morgan County, Georgia**

Meta Stanton Springs Data Center

Meta, Morning Hornet and Baymare (collectively, "Meta"):

This firm has been retained by Beverly and Phillip J. (Jeff) Morris, and Chris and Lindsay Wilson regarding past and ongoing damage to their real property caused by your development, ownership and operation of a rural, hyperscale data center complex across the street from their homes.

This letter is a good faith attempt to promptly find a solution that will cease your past and ongoing interference with the Morris' and Wilson's use and enjoyment of their property, and remedy the harms they have sustained as a result of your unreasonable development and operation of the Stanton Springs Data Center in Social Circle Georgia (formerly known as the Newton Data Center). The Morris' and the Wilsons have sustained damages from silt and sedimentation in their water supplies and sediment intrusion, premature failure of home appliances, loss of reasonable use of water fixtures and plumbing and clogged pipes and water lines, disruption of electrical power, excessive noise and vibration, light pollution, and other harms and losses from your land disturbing, development, ownership and operation of the Stanton Springs Data Center.

We understand that each of the addressees of this letter have had and may continue to have involvement with the development of the Meta Stanton Springs Data Center site so as to be in position to abate the pollution and ongoing harms set forth in this letter. It is their sincere hope that Meta will decide to engage in a good faith, in-person discussion to arrive at a prompt, permanent resolution that will end the harms imposed on them by the Stanton Springs Data Center, in the hopes of avoiding unnecessary litigation. Nevertheless, to preserve their interests, this letter places Meta on formal notice of their claim and demand for abatement of nuisance pursuant to O.C.G.A. § 41-1-1 *et seq.* as well as trespass and interference with enjoyment and use of their property pursuant to O.C.G.A. § 51-9-1. The Morris and Wilsons likewise reserve the right to pursue relief against you and others who are liable for their losses and damages for nuisance and trespass, as well as damages arising under negligence, negligence per se for violations of the Georgia Erosion & Sedimentation Act and Georgia Water Quality Control Act, strict liability for ultrahazardous activity, and other theories, including injunctive and other equitable relief, as well as punitive damages.

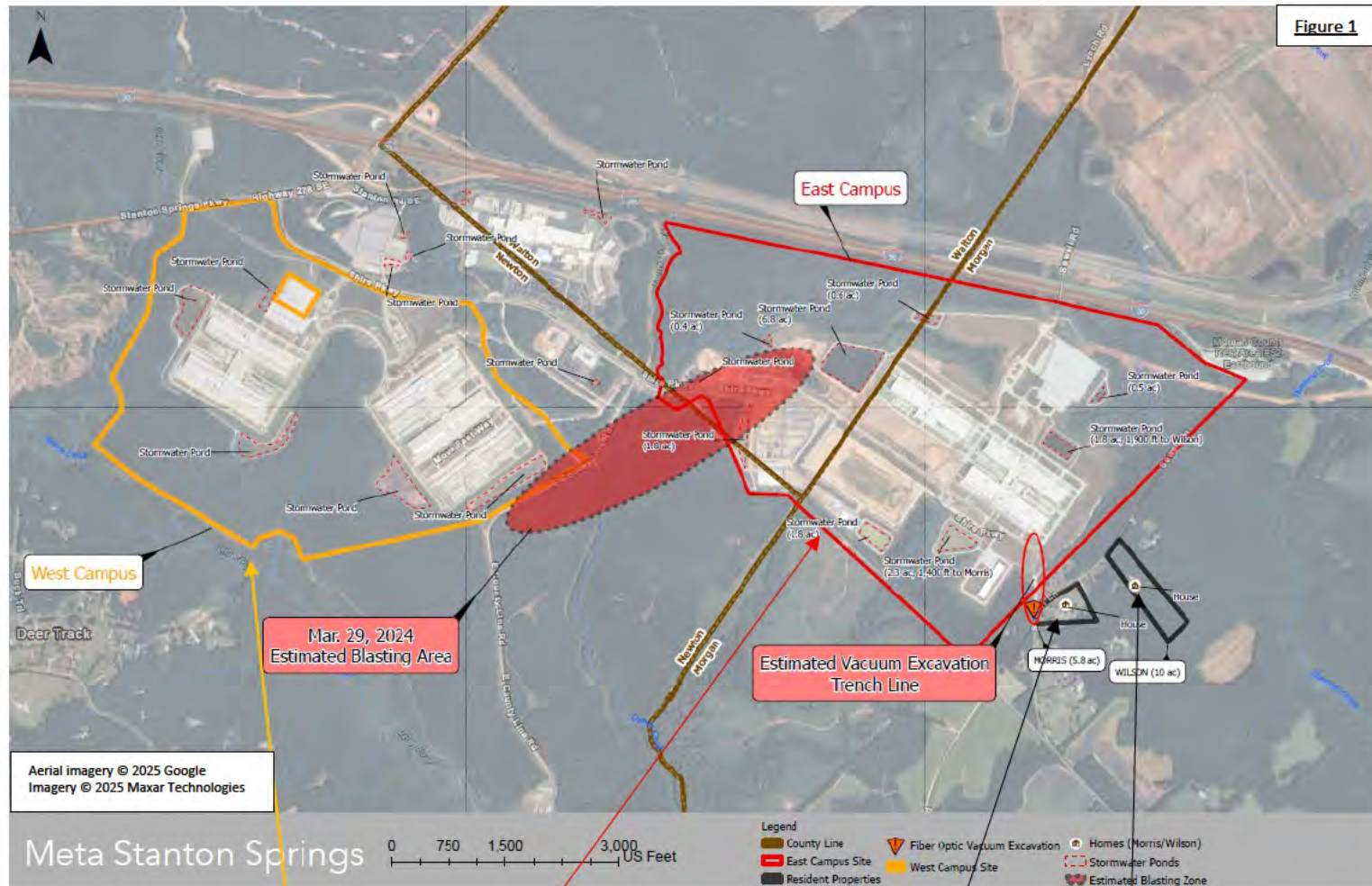
The facts set forth herein are based on information presently available and reflect reasonable investigation conducted to date. This demand is made without waiver of rights, and all factual statements are necessarily subject to revision or supplementation as additional documents, data or disclosures become available.

I. The Properties Harmed by the Stanton Springs Data Center

Beverly and Jeff Morris own a home on approximately 6.4 acres at 1121 Sewell Lane, Mansfield GA 30055, Morgan County Parcel No. 014 032 (“Morris Property”) (See [Figure 1](#), next page). Chris and Lindsay Wilson own a home on about 10 acres at 1201 Sewell Lane, Mansfield Georgia 30055, Parcel No. 014 035 (“Wilson Property”) ([Figure 1](#)). Both the Morris Property and the Wilson Property are zoned R4-Residential.

The “Meta Stanton Springs Data Center” refers to a colossal complex of buildings and supporting infrastructure spread across two campuses collectively occupying portions of *three* Georgia counties – Walton, Newton, and Morgan. ([Figure 1](#), below).

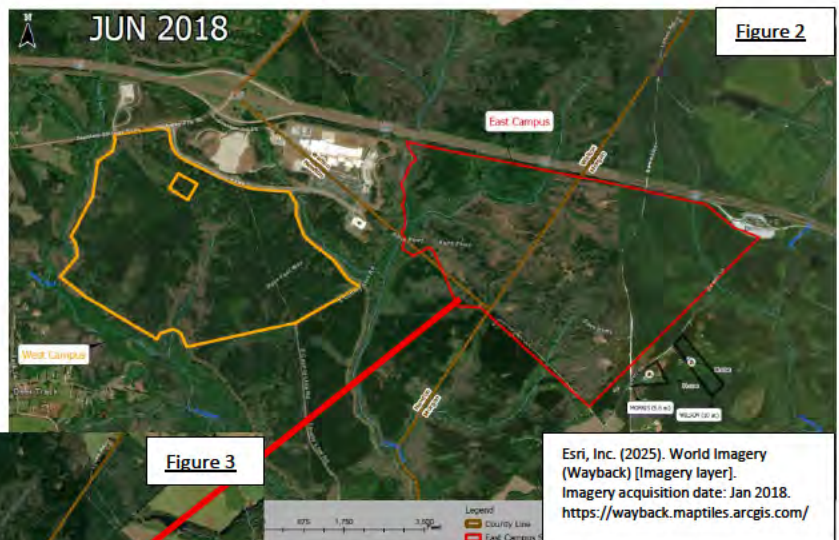
[See next page]



The Stanton Springs **“East Campus,”** Morgan County Parcel No. 013 044, occupies more than 566 acres bordered on its East by Sewell Lane. The **Morris Property** and **Wilson Property** are located on the other side of Sewell Lane. The East Campus is on land owned by the Joint Development Authority of Jasper County, Morgan County, Newton County & Walton County (or “JDA”).

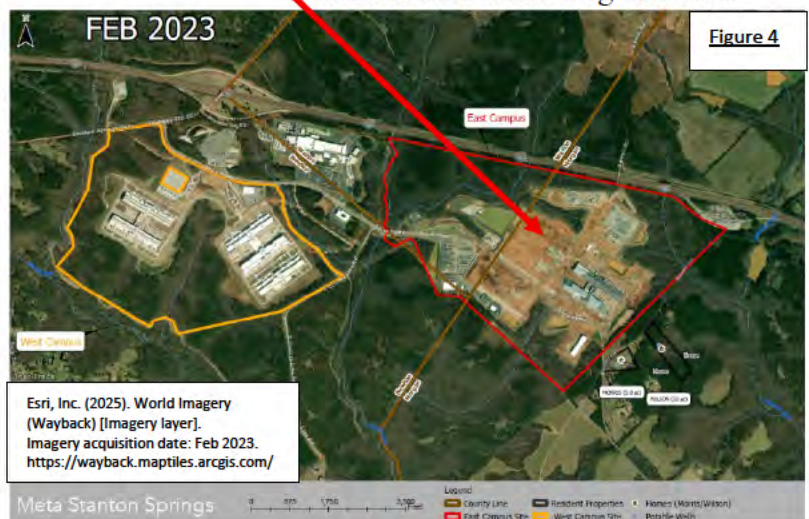
The **“West Campus”** occupies about 416 acres within Walton County, parcel No. 01340005, also owned by the JDA. As its name suggests, the West Campus sits further to the west of the East Campus. Collectively, the Stanton Springs Data Center was developed by Baymare LLC (“Baymare”) and Morning Hornet LLC (“Morning Hornet”), and is run by Meta Platforms, Inc. (“Meta”).

The project broke ground in 2018. Figures 2 through 5 illustrate the transformation of the neighborhood relative to where the Morris and Wilson families live.¹ What was once a refuge in nature selected by the Morrises and Wilsons for its seclusion and tranquility in 2016 (Morris), and in 2020 (Wilson) resembles nothing like it did when these families purchased their homes.



By late 2020, both families observed rapid deforestation across immense swathes of land west of their properties, eventually leaving bare red clay earth where a forest once stood. Site development included large-scale grading to prepare a foundation for multiple building pads, subsurface excavation, trenching and other land disturbing activities

This land clearing, grading, excavation, and industrial scale earthmoving operation lasted for well over a year, given the size of the East Campus.



¹ Full page Figures 1 through 5 are appended to this letter.

Today, the East Campus houses thousands of computer servers, cooling infrastructure including surface water ponds, fans, and electrical power generators, and fiber-optic infrastructure supporting “cloud” based computing operations.

To connect these computer systems to the network, you engaged contractors to excavate trenches and perform related work to install underground fiber optic conduits, including work performed in proximity to the eastern edge of the East Campus, which is bordered by **Sewell Lane**. The Morris Property and the Wilson Property lie at the other side of Sewell Lane from the East Campus.



The scale of your land disturbing and construction activity involved years-long, nearly daily operation of heavy equipment at various stages and in various proximity to the Wilson and Morris homes, including vacuum excavation (“hydrovac” or “vac-ex”) and trenching, and sustained site work to construct the multi-structure industrial park where the East Campus now sits. In at least one instance, your development work included explosives blasting to prepare portions of the Stanton Springs Data Center site, in a location believed to be approximately 1.1 miles from the Morris Property (*see Figure 1* above).

The cumulative effect of these operations is substantial disturbance of soil, overburden, and shallow groundwater flow paths that are continuing to adversely affect the Wilsons and Morrisises, whose homes are located just across the street from the massive East Campus site. In every sense of the term, Stanton Springs and the Morrisises and Wilsons are neighbors. As detailed in this letter, under any reasonable interpretation of the term, Meta has been anything *but* a good one.

II. Summary of Harms

The following non-exhaustive summary of harms flow directly from Meta's transformation of a once-forested, quiet rural-residential area into a continual nightmare for the Morris and Wilsons. In sum, Meta's mass clearing, excavation, regrading, blasting, and high-intensity operations triggered a cascade of adverse impacts that haunt them to this day: contaminated wells, sediment migration, intrusive noise and light, dust, wildlife displacement,

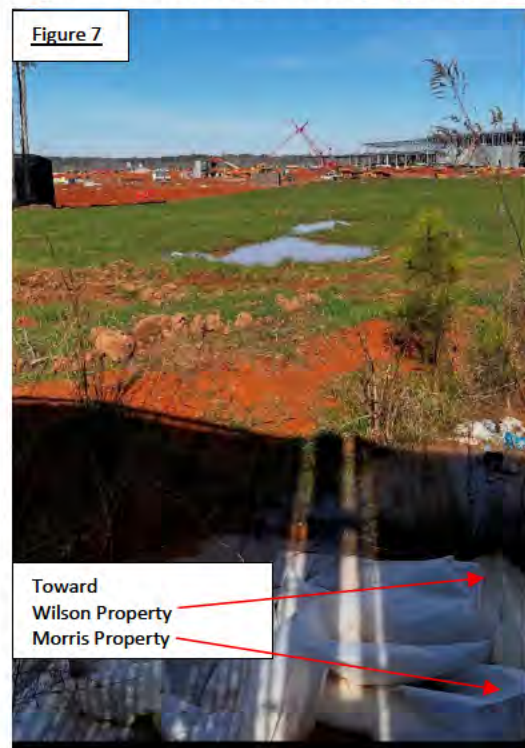
and loss/degradation of basic residential functions such as reliable electricity and home appliances and fixtures that malfunction and fail.

These harms are not trivial or fanciful; they are highly intrusive, substantially degrading daily life. These conditions did not exist before Meta's development began across the street.

A. Surface-Water Runoff/Contamination

Adjacent to the Morris and Wilson homes, Meta transformed what was once a heavily forested landscape (e.g. [Figure 2](#) above, 2018) into a massive industrial zone on the other side of the street (e.g. [Figures 1, 3-4](#) above). More than 470 acres (roughly equivalent to 350 football fields) were stripped of vegetation, and over 4 million cubic yards of soil were graded, excavated, and reshaped—along with roughly 155,000 cubic yards of bedrock blasted—to build the East and West Campus facilities. The scope of these activities was unprecedented at the time in this rural-residential setting: entire ridgelines were removed, red-clay soils were exposed, and the natural drainage patterns that had existed for generations were fundamentally altered.

Meta's mass clearing and grading exposed wide expanses of red clay directly upslope of the Morris and



Wilson homes (e.g., [Figures 3-4](#) above). Without the forest canopy and root systems that once stabilized these soils,

Meta's mass grading left large areas of loose, exposed red clay highly susceptible to erosion and rainfall.



To install fiber optic cables underground to connect the East Campus data center to the cloud, you and your contractors performed hydro-excavation (or Vacuum excavation) trenching, and possibly horizontal drilling, along the corridor from the East Campus toward Sewell Lane across the intersection from the



Morris Property, further uncovering and destabilizing these soils (See [Figure 8](#) below, Vacuum excavation May 23, 2023 and nearby pollution impacts).

- East Campus
- Hydrovac trenching zone
- Morris well water



In performing this work, you created additional pathways for sediment to mobilize downslope in the direction of the Morris and Wilson properties. The effects are significant and ongoing. As shown in [Figure 8](#), stormwater runoff now carries sediment from both the graded areas and these trenching operations into roadside ditches and swales, continuing onto the Morris Property.

These runoff patterns emerged only after this land disturbing work took place and remain to this day. Red-clay sediment matching the exposed soils on Meta's site (e.g. [Figures 3-7](#) above) now accumulates in the roadside ditch on the Morris Property along Sewell Lane, moving downslope toward the Wilson Property during large rain events. As shown in [Figure 8](#) (Vacuum excavation May 23, 2023) and resulting impacts May 29, 2025 and November 9, 2025, this sediment pools during rain events, collects in drainage swales, and discharges across the



intersection (including through a corrugated pipe) to and alongside Sewell Lane, precisely along the downgradient path from the East Campus toward the Morris and Wilson homes and their onsite wells. As shown on [Figure 8](#) above and [Figures 8A](#) and [8B](#) below, these sediment-laden ditches are upgradient to and a short distance from the Morris' groundwater well.

This surface sediment runoff is not an isolated occurrence. It is now a recurring condition caused by inadequate and unreasonable construction and land disturbing activity over which you have control in the planning, development, and continual operation and maintenance of Stanton Springs, and it is consistent with the lack of vegetative cover, the magnitude of grading, and the insufficient containment of disturbed soils on your site.

As shown herein, the Morris' experienced and continue to experience sediment deposits on their land after significant rainstorms, as well as visible sediment contamination in ditch flow, with progressive buildup of sediment fines in drainage areas that had previously remained clear.



The source of the Morris and Wilson well contamination is obvious: Meta's land disturbance on and from the East Campus exposed vast areas of erodible soil; precipitation and stormwater has



mobilized that sediment, and the downstream drainage path now carries it directly toward the Morris and Wilson properties.

B. Well Damage and Groundwater Contamination

These surface disturbances are only part of the story; Meta's land disturbing, construction and ongoing operation at Stanton Springs has materially altered the subsurface features and characteristics that supply these families' drinking water, harming them. Because the Morris'

and Wilsons rely exclusively on well water, it is foreseeable that improper land disturbing activity on your site across the street would directly impact them and their water supplies – which is precisely what is happening.

Before Meta started its significant deforestation of the East Campus site, the Morris and Wilsons relied on stable, trouble-free water supplied by groundwater wells. Their water was clear, water pressure was consistent, and they had no issues with sediment infiltration. The Morris engaged a certified home inspector prior to purchasing their home in 2016 as part of their purchase due diligence, documenting no plumbing, fixture, well or drinking-water problems.

Similarly, in July 2020, the Wilsons engaged a certified home inspector, documenting the onsite well conditions as having no issues with respect to sediment or siltation. Figure 9 is the Wilson's whole home water filter drawn from their well, as of their July 2020 Home Inspection report, prior to Meta's mass-land disturbing activity at the East Campus. Figure 11 below is the *same* filter on December 8, 2025, clogged with sediment overwhelming their groundwater well from the East Campus site. The filter had been replaced just a month prior (Figure 10).



Figure 9 (Wilson water filter, July 29, 2020)



Figure 10 (Wilson water filter being replaced Nov. 9, 2025)



Figure 11 (Wilson water filter, December 8, 2025)

Water quality from both the Wilson and Morris wells changed only when Meta began large-scale construction across the street in late 2020, disturbing the recharge soils and shallow fractured-rock aquifer that supplies these homes.

Well contamination began only *after* your land disturbing work.

Meta's soil excavation, heavy equipment operations, hydro-excavation trenching, grading, blasting and other activities and failures to act occurred near the Morris and Wilson properties—well within the zone influencing the shallow aquifer that provides their drinking water. Shortly after these operations began to significantly disturb soils in late 2020, both families experienced signs of groundwater degradation and resulting harms, including:

- Sediment-laden, cloudy, reddish well water
- Rapid degradation of the Wilson's home water filter, requiring unreasonably frequent filter changes that have failed to eliminate sediment intrusion in the home's water supply
- Clogged pipes, water supply lines and fixture failures due to sediment build up
- Malfunction and premature failure of water-dependent appliances; the Morris Family has replaced their washing machine *multiple* times since 2021, they have had to borrow money to deal with the incessant plumbing, fixture and appliance repair and maintenance costs caused by sediment intrusion; the Wilsons recently replaced their refrigerator with its built in water tap, with their washing machine constantly malfunctioning and barely hanging on
- Inability to operate more than one bathroom at a time due to lack of water pressure, and reduced or impaired function of cold water drawn directly from their wells

These and other harmful conditions were absent before Meta's construction of the Staton Springs Data Center. The Morris Family lived on their property for several years without incident from 2016 until your land-clearing work at the East Campus in late 2020. As for the Wilsons—they had just recently moved to their “dream” home in a secluded, wooded property in a quiet country atmosphere only months prior to commencement of your significant land disturbing activity.

The onset of these families' well contamination and the cascade of harms that followed mirrors the timing of deforestation, excavation, trenching, grading, blasting and construction activities at the Stanton Springs Data Center. In comparison, this timeline is inconsistent with seasonal groundwater/weather variability or natural fluctuations in groundwater levels, and is likewise inconsistent the effects of ordinary maintenance issues that all homeowners might encounter. Both families have incurred significant trouble and expense in their increasingly desperate respective bids to maintain basic household functions that involve clean, running water. The timeline of harms detailed above, experienced almost simultaneously by the Morris and Wilson families, is consistent with the introduction and movement of disturbances of nearby

subsurface soils within a shallow aquifer – the very conditions that exist along and beneath Sewell Lane and these families’ homes.

i. Sediment Observed in the Wells is Consistent With Soils from Meta’s Site

The reddish fines and sediment accumulating in these families’ water systems match the color and texture of the exposed red-clay soils on Meta’s construction site. While surface runoff into roadside ditches demonstrates that Meta’s disturbed soils are mobilized and moving downstream, these same fines are moving downgradient in the aquifer and are appearing inside the Morris’ and Wilsons’ wells and household plumbing/water lines — clear indications of subsurface transport of these pollutants from your site, and not merely surface discharges of your sediment (which is visible to the naked eye, as shown in [Figure 6](#), [Figure 7](#), [Figure 8](#), [Figure 8A](#), and [Figure 8B](#) above).

As they draw in water from the aquifer, the Morris and Wilson wells are intercepting large concentrations of Meta’s sediment in groundwater at depth. As their pre-purchase home inspections independently demonstrate in 2016 (Morris) and in 2020 (Wilson), this condition that did not exist until Meta disrupted the aquifer by leveling hundreds of acres, blasting into bedrock, trenching, and constructing its massive industrial site with manifestly improper perimeter containment or site control that would otherwise prevent it from unleashing masses of sediment into the water table, and in stormwater discharges.

ii. Construction-Related Disturbances to the Aquifer

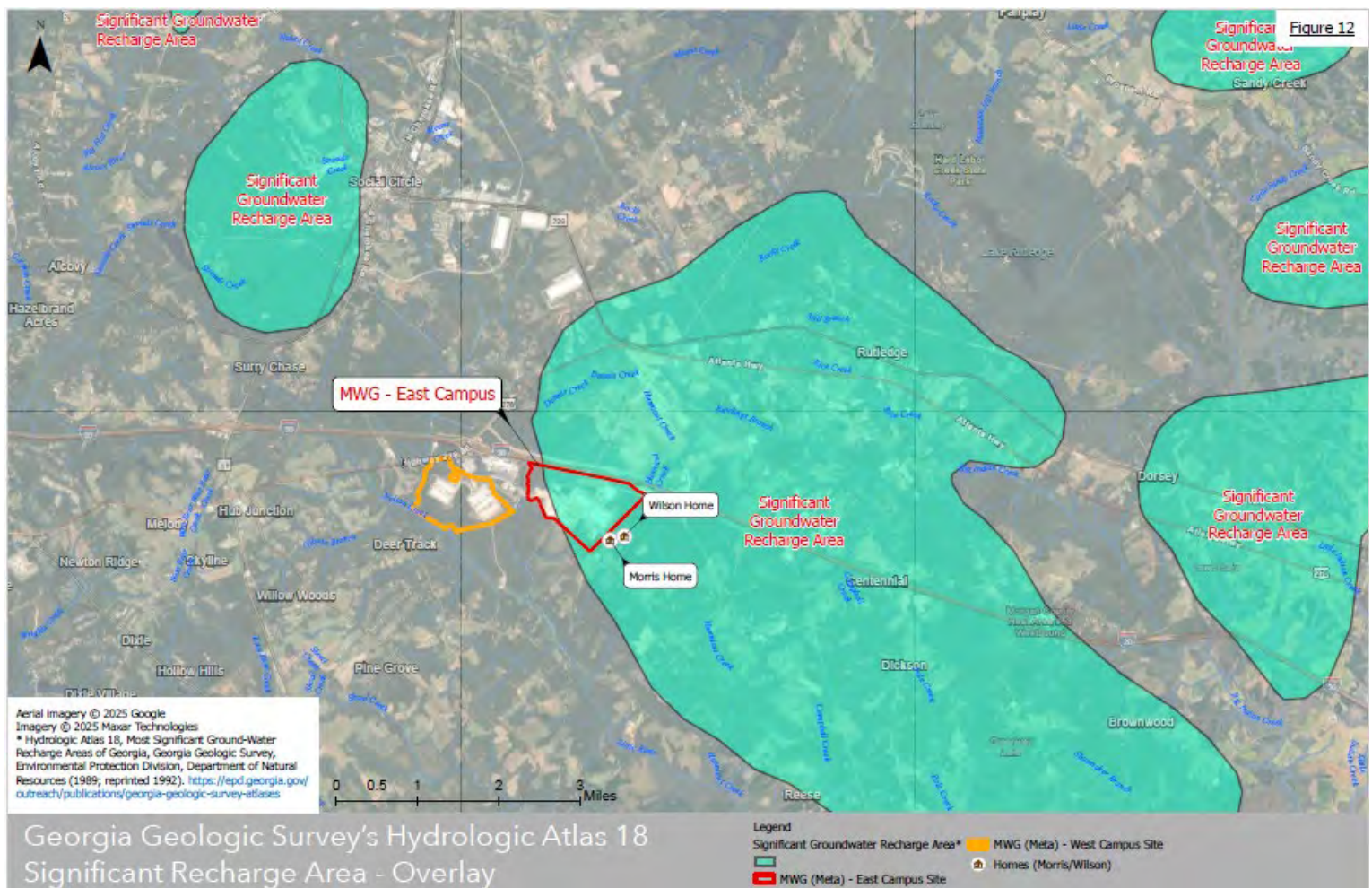
Meta’s deforestation, blasting, grading, deep excavation, heavy equipment loading, and extended hydro-excavation trenching likely created repeated mechanical disturbances to the shallow aquifer system, which explains the harms they have been sustaining for the very timeframe that fits the Stanton Springs development sequence set out above. Rapid deforestation and removal of topsoil to below the previously-existing root structure, excavation and grading increases surface water and rainfall infiltration as well as sediment migration into the aquifer, given that the forest and dense vegetation that once existed there has been erased.

Blasting—removing roughly 155,000 cubic yards of rock and dirt — can open fractures, increase hydraulic connectivity, and mobilize sediment over considerable distances. The level of your blasting to develop Stanton Springs is *substantial*. For context, 155,000 cubic yards of bedrock is equal to roughly 4.2 million cubic feet, or enough to fit a 17-story office tower occupying a 25,000 footprint. That is enough blasted rock and dirt to fit roughly the size of the Candler Building in downtown Atlanta, which is 17-stories high.

Seismic activity at such a scale within little more than a mile from these properties is more than enough to significantly alter the subsurface. Months of vibration from cranes, compactors, loaded trucks, and foundation work could further loosen and mobilize fines and alter subsurface flow paths. These disturbances, taken together, provide a direct and foreseeable mechanism for sediment migration into nearby groundwater wells, such as those on the Morris and Wilson properties.

iii. Recharge-Area Vulnerability of Aquifer

As shown in [Figure 12](#) below (and attached), the East Campus and the Morris and Wilson properties all sit within a “Most Significant Ground-Water Recharge Area” as formally mapped by the Georgia Geologic Survey in Hydrologic Atlas 18.² Such designations are “those regions likely to have the greatest vulnerability to pollution of ground water from the surface and near surface activities of man.”³ In this particular region of Georgia, the shallow aquifer system is replenished primarily through thick, permeable soils that allow rainfall to infiltrate vertically (top down) into the fractured-rock groundwater system supplying these homes. These soils are the aquifer’s protective and functional interface: they regulate infiltration, stabilize fines, and maintain the clarity and reliability of the groundwater entering domestic wells.

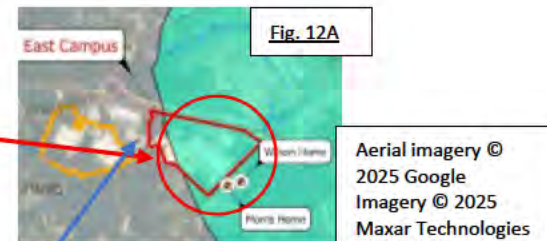


² Hydrologic Atlas 18, Most Significant Ground-Water Recharge Areas of Georgia, Georgia Geologic Survey, Environmental Protection Division, Department of Natural Resources (1989; reprinted 1992). <https://epd.georgia.gov/outreach/publications/georgia-geologic-survey-atlases>

³ See *id.* (“WHAT ARE RECHARGE AREAS?”)

When construction of Meta's East Campus removed the vegetative cover, stripped away soil, blasted bedrock, and opened large areas of disturbed earth, it directly altered the natural recharge process operating in this designated zone, shown in Figure 12 (green). Disturbance of significant-recharge soils can reasonably be expected to increase the downward migration of fine sediment, contribute to turbidity pulses after storms, and alter flow paths into the shallow aquifer. These effects mirror precisely what the Morris and Wilson families are experiencing: red-clay fines in their well water, repeated filter clogging, reduced pressure, and turbidity events following storm activity from your blasting, trenching, excavation/construction and inadequate controls or safeguards.

Figure 12 illustrates this clearly. The **East Campus** footprint and the **Morris** and **Wilson** properties all fall **squarely within** the mapped "Most Significant Ground-Water Recharge Area" (green shaded region, Fig. 12A). In this Georgia-designated significant recharge area, a large-scale land-disturbing project of Meta's magnitude at Stanton Springs does not simply reshape the surface; it destabilizes the very materials through which groundwater enters and moves about the aquifer. Once disturbed, these soils can readily transmit fine sediment downward, and the downgradient wells (Morris and Wilson) become the receivers of that sediment. Now disturbed, this condition and the pollution it has unleashed will continuously encroach upon the Morris and Wilson wells and the properties on which they sit. Your **explosives blasting** is believed to have occurred just outside and to the west of this portion of Georgia's Most Significant Ground-Water Recharge Area, which likely seismically impacted the regions within this sensitive Recharge Area.



These features reinforce the other factors detailed above as to timing, proximity, downgradient alignment, and the observed sediment impacts sustained by both the Morris and Wilson families shortly after substantial land clearing at the East Campus began. Put simply, Meta's construction activity occurred in a location where the aquifer is inherently sensitive to disruption (a Most Significant Ground-Water Recharge Area), and the resulting contamination of both domestic wells by sediment disturbed by that construction activity is entirely consistent with the disturbance of this significant-recharge system, wherein you used explosives to develop the site just outside of that system.

The harms to their wells and connected fixtures, plumbing and appliances that the Morris and Wilsons have endured was foreseeable, and was actually foreseen, given your selection of the East Campus site for large-scale deforestation, trenching, and excavation despite Georgia's designation of this zone as having "the greatest vulnerability to pollution of ground water from the surface and near service activities by man."

iv. Result: Ongoing, Worsening Groundwater Contamination

What had been stable, reliable drinking-water systems for these homes are now chronically impaired. The Morris and Wilson wells continue to deliver sediment-laden water drawn from the now-polluted aquifer; pressure and flow remain diminished, with water lines and fixtures impacted by sediment; filters and appliances such as washing machines fail prematurely

or malfunction; and the families must make continuous household adjustments to account for the nuisance and inconvenience imposed by sediment-laden water entering their homes. *See Figure 13 and Figure 14 below* (recent and ongoing Wilson and Morris groundwater well impacts).

The Wilsons' Well Impacts



The Wilson family has endured malfunction or failure of multiple appliances that use water, necessitating replacement of their water heater, frequent water filter changes, and repeated repair expenses to address sediment-impacted internal pipes and infrastructure. Plumbing visits provide temporary relief, only for reduced function to return after continual sediment intrusion. Lack of cold water pressure, drawn from a well that is mired with sediment, is now a constant headache, and mirrors the situation faced by the neighboring Morris family. The Wilson family must often suffer the indignation of timing showers and bathroom visits amongst themselves due to perpetual low water pressure, placing them in the unenviable position of deciding between running their washing machine, or allowing their son to take a shower, for example. Multiple systems in the home that rely on water are malfunctioning due to the continual introduction of sediment and “muddy water,” despite the relatively new age of these systems, initially installed in 2016. The Wilson’s replacement washing machine, purchased in 2018, constantly reports error messages tied to its water supply, exhibiting strain from sediment-polluted supply lines. Any

reservoir of water, such as bathwater, or toilet tanks exhibit the telltale brown, sediment-laden characteristics directly tied to well pollution from the now-impaired aquifer. These impacts were first observed in late 2020, with their effects increasing over time, and have plagued their home since.

The Morris' Well Impacts



Shortly following your mass grading and construction activity at Stanton Springs, the Morris' must likewise contend with the perpetual burden and inconvenience of low water pressure due to impaired water line function, seeking temporary relief only after disconnecting their water lines, and physically air blasting the interiors to dislodge sediment build up. (See, e.g., Figure 14, above; sediment-laden water extracted from water supply line air blasted to clear the line, dated Oct 12, 2025). As the Morris' were adjusting to their newly experienced plight, their 2.5 bedroom home was functionally reduced to one bathroom, at times requiring use of a bucket to generate enough water pressure to flush their toilets. Their kitchen sink essentially ceased supplying cold water, requiring perpetual bucket trips to provide enough water to perform basic household tasks, such as rinsing dishes or preparing food.

At various points in time, it was discovered that their son's bathroom ran mostly hot water drawn from their water heater reservoir, resulting in scalding due during showers because of insufficient cold water supply in that bathroom. In a desperate bid to restore basic plumbing

functions in their home, the Morriszes shut off all of their water, again air blasted the supply lines to clear them of sediment, and replaced sections of their plumbing and fixtures to remove portions impacted by sediment. They've endured this anxiety inducing, highly inconvenient and demoralizing situation since at least 2023. To combat these issues, the Morriszes spent thousands of dollars to repair or replace their interior pipes, fixtures, and water appliances, having to borrow money at times to do so. These repair and mitigation measures are merely a temporary respite until the sediment that now permeates the aquifer under their home intrudes once again.

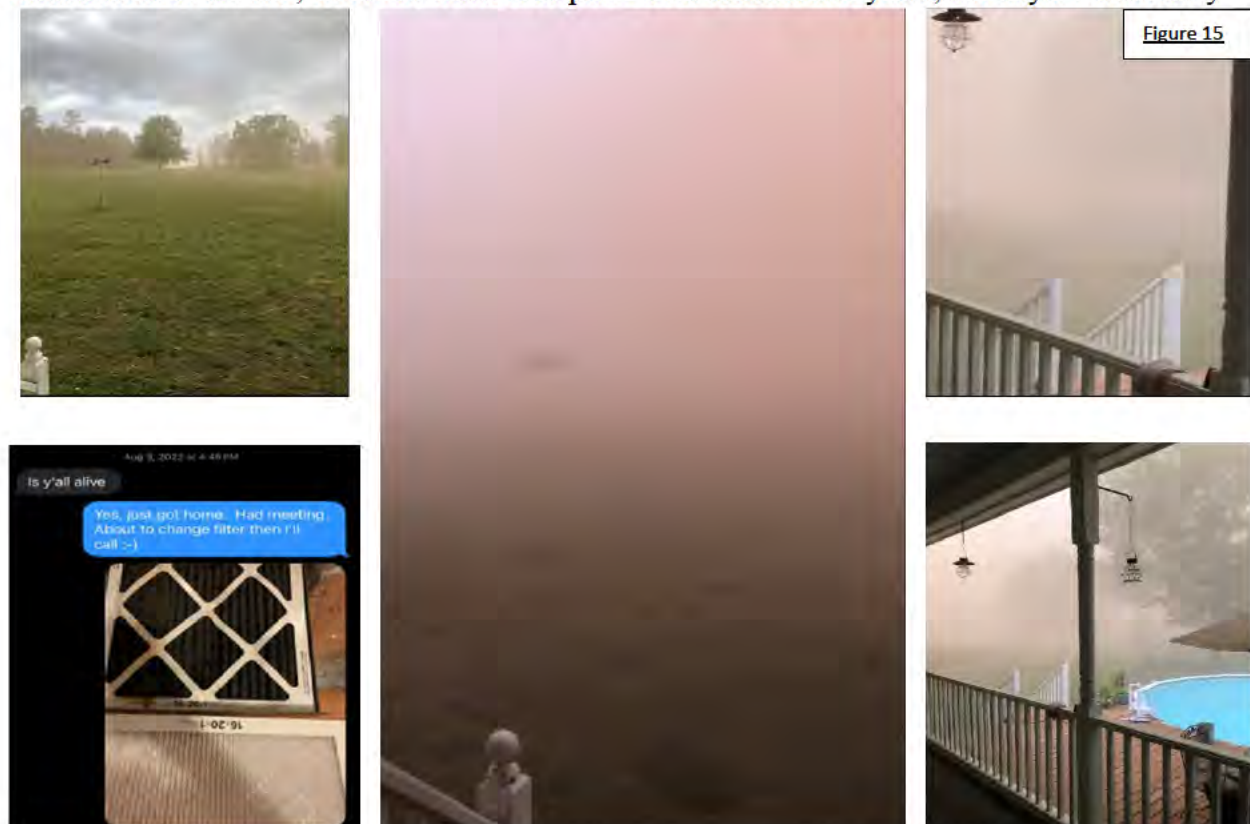
All of these impacts are consistent with a disturbed aquifer transporting fine sediment from the East Campus site to the nearby wells and properties, and was entirely foreseeable given the size, scope, nature, and duration of your site development, land disturbing, construction activity and ongoing operation, ownership, and control over the Stanton Springs site.

C. Dust, Light and Noise, Vibration Nuisance

After the land deforestation and grading removed the vegetative buffer, these families became exposed to industrial-scale dust, noise and illumination from the East Campus.

i. Dust

Meta's mass grading and deforestation left large areas of exposed red clay susceptible to wind erosion, caused by your continual failure to implement proper dust control and perimeter containment at the site, whereon work took place over months and years, not days. Particularly

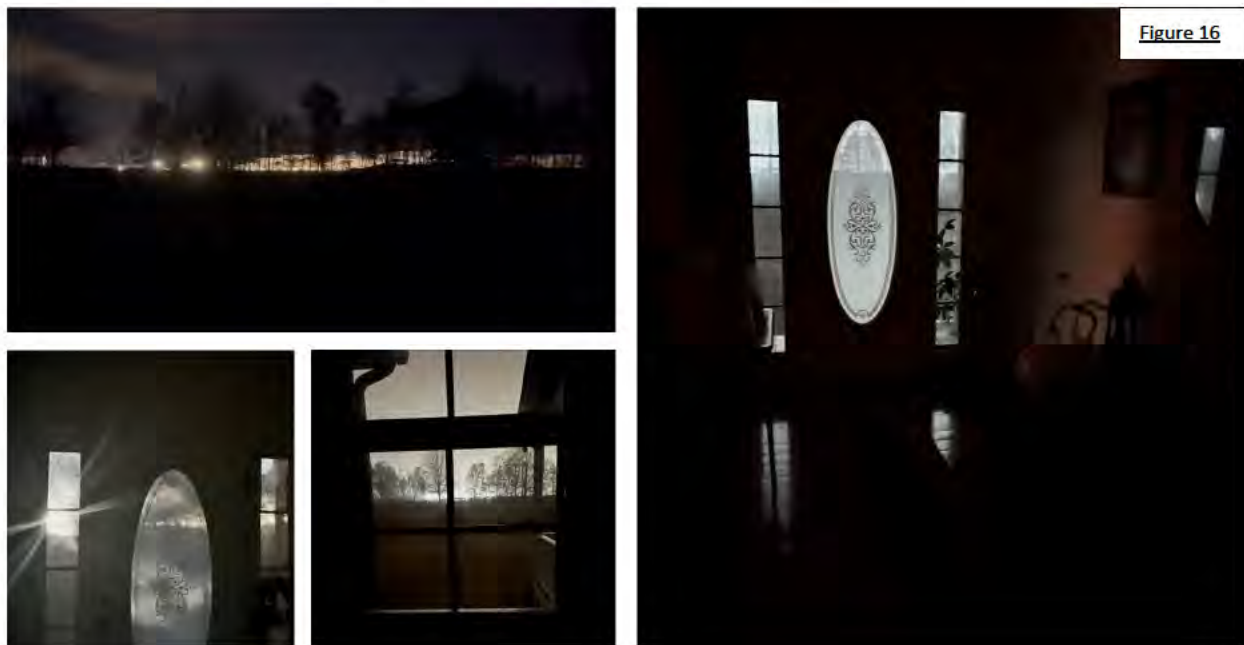


during active construction in 2021 – 2022, dust from these disturbed soils repeatedly migrated off the East Campus and settled onto the Morris and Wilson properties. The families documented dust clouds crossing Sewell Lane, coating porches, vehicles, outdoor furniture, and household surfaces, exposing them and their animals to your construction pollution. On multiple occasions, airborne particulates were dense enough to reduce visibility and force the families indoors.

HVAC filters clogged with unusual frequency, overwhelmed with high volumes of fine dust infiltrating their homes and interior air. The Wilsons recently replaced their HVAC unit prematurely, likely due to increased stress placed on the system having to contend with these impacts. These dust conditions did not occur before Meta's large-scale land disturbance across Sewell Lane. See [Figure 15](#), June 17, 2022 and August 9, 2022 dust impacts.

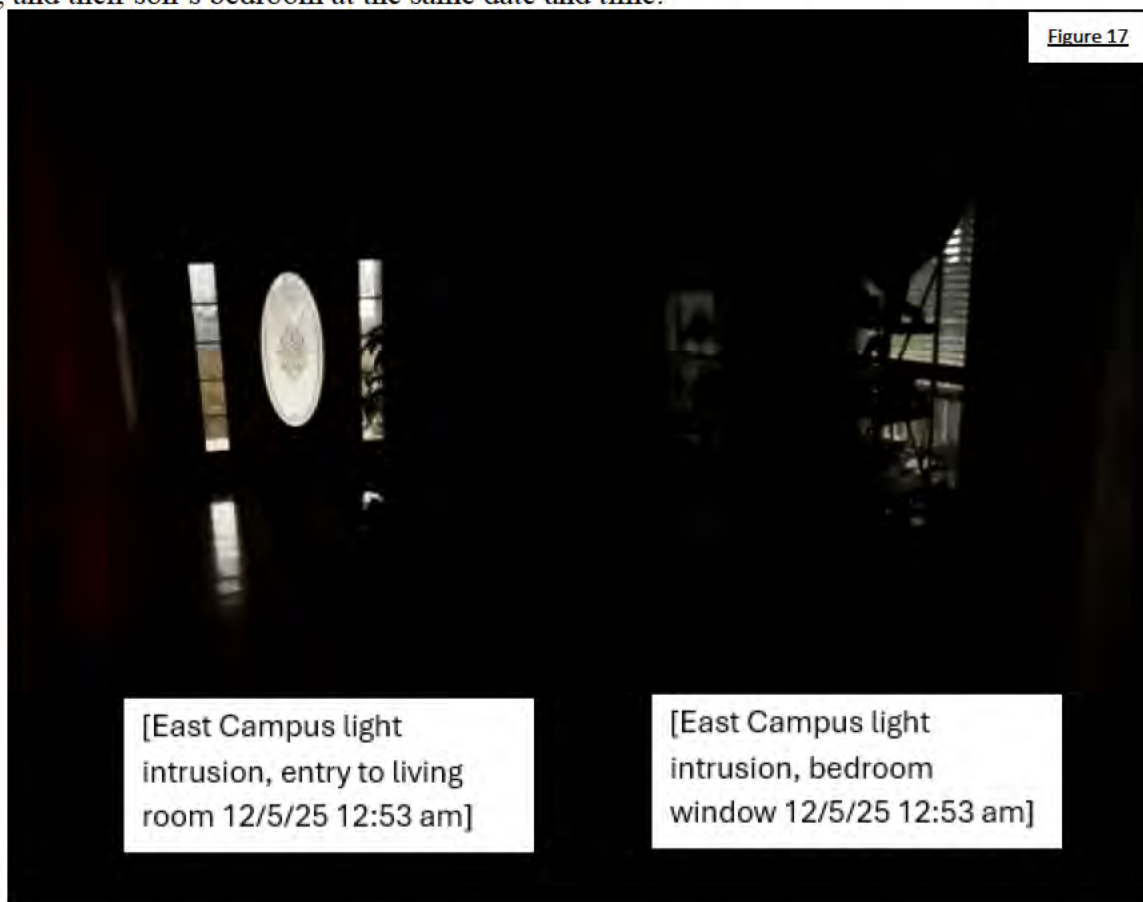
ii. Light pollution

With no tree cover remaining at the East Campus, Meta's elevated, high-intensity exterior lighting projects directly into the Morris home, illuminating living spaces and bedrooms throughout the evening. These lighting patterns are inconsistent with rural-residential use and are a continual disruption to the quiet enjoyment of the property. [Figure 16](#) shows the interior of the Morris home on January 24, 2024 (1:54/1:53 am); and May 8, 2025 (9:19 pm), and your unreasonable light intrusion from the East Campus.



Any purported mitigation measures you have undertaken in 2025 have failed to limit the unreasonable incursion of light into the Morris home after dark. [Figure 17](#) below shows the interior of the Morris home in the *middle of the night*, wherein your East Campus industrial lighting continues to intrude into their windows, including their living room and son's bedroom.

Figure 14 shows the Morris interior entryway to the living room on December 5, 2025 at 12:53 am, and their son's bedroom at the same date and time:



Prior to the development of Stanton Springs, the stars were visible in the clear night sky, with no artificial light intrusion in their windows after dark. Today, the East Campus artificially and unreasonably subjects their home to persistent lighting well beyond normal operational hours. Your nighttime illumination exceeds levels necessary for any reasonable purpose that might justify the annoyance and inconvenience imposed on the Morrises, creating an avoidable, continuous and foreseeable light trespass and nuisance. During overcast or cloudy evenings, the East Campus lighting is *worsened* in comparison with the conditions shown in Figures 16 and 17. Fog, cloud conditions or low-lying mist act as light reflectors off the intense exterior lighting system at the East Campus, creating an even brighter, uniform skyglow extending from your industrial park directly into the Morrises home after dark.

iii. Noise

The absence of tree cover and sound barriers at the perimeter of the site renders the massive industrial complex both a source of noise, and a ready conduit of increased traffic noise

from Interstate 20. Power generators, alarms, heavy equipment, and cooling infrastructure produce sustained sound levels far exceeding normal rural-residential expectations at Stanton Springs, disturbing the Morris and Wilson families' reasonable expectations of quiet enjoyment of their homes. The families recorded high-pitched alarms, loud generator noise late at night and during the day, and persistent daytime vibrations from construction and ongoing operations of the East Campus. Currently, the Morrises, whose home is roughly 1,000 feet from your site, experience a battery of electromechanical noises from the East Campus often resembling a continual "hum," punctuated by periods of increased noise activity when the generators kick in.

The construction and operation of your hyperscale data center across the street presents a clear and present threat to the health and well-being of the Morrises and Wilsons due to the threat of pervasive low frequency noise (LFN) and vibrations. Unlike noise that is readily audible to the human ear such as highway traffic, data center noise can generate perpetual LFN, exposing nearby residents to a significant nuisance. Because data centers generate massive amounts of heat, they must use an array of equipment such as industrial chillers, and banks of cooling fans, all of which can run for extended periods around the clock. These devices, alone or in combination, often emit a low-frequency "hum" or "drone" that operates at frequencies that aren't perceived by the human ear, but can inflict lasting harms on neighboring residents. LFN readily penetrates walls and structures, and is capable of causing significant, non-auditory human health effects even at low decibel levels.

These families never consented subjected to industrial scale LFN from the East Campus, from which they cannot escape. The Morrises and Wilsons are highly concerned about negative health impacts associated with the chronic LFN and vibration exposure to which they are likely subjected as a result of the East Campus operations, and question whether you have undertaken sufficient safeguards in the design, construction, and operation of the East Campus to properly assess and eliminate harmful LFN emissions into their homes. Both families have experienced severe sleep disruption and migraine headaches, as well as increased stress and anxiety following construction and initial operation of the East Campus, which has diminished and degraded their quality of life. These emissions constitute a private nuisance and a trespass that you are obligated to prevent and mitigate.

D. Nuisance, Trespass from Electrical Power Disruption, Displaced Wildlife

Beyond the well contamination and the dust, audible noise, LFN, and light pollution described above, these families have endured substantial additional disruptions to the quiet use of their properties. The Wilsons now must contend with ongoing, highly disruptive electrical instability that occurs without warning and that routinely causes the home's breaker panel to trip – a function used to protect their household circuits from damage. Each incident forces them to reset their breakers, often several times per week, prompting a reasonable fear of an unsafe, and certainly annoying and inconvenient home environment. For their part, the Morrises have experienced a similar loss of electrical power since your site operations at the East Campus began. The repeated loss or intermittent changes to the electrical power supply, including repeated tripping of the Wilson's electrical panel, underscores that the home's electrical infrastructure is likely being stressed beyond its intended operation conditions from an unstable

power source. As a result, these families are left with a reasonable fear of permanent electrical failure or damage to their appliances, compromised safety, and further degradation of property value.

The large-scale deforestation and construction activity displaced wildlife into the surrounding residential area, leading to pet injuries, suffering and deaths, as well as recurring encounters with wild animals that had not previously appeared on their land. The Morrisises have lost their beloved pet Beagle mix to a venomous snake bite shortly following your land-clearing activity in the winter of 2022, and the Wilsons have lost multiple pets to predation from wild animals in the same timeframe.

Individually, each of these impacts has diminished the families' ability to use and enjoy their homes. Taken together, they amount to an ongoing and substantial nuisance.

E. These harms are a continuing nuisance and trespass that must be abated

As the above shows, Meta's development has adversely impacted the groundwater supplying these homes, unreasonably interfering with the Morrisises' and Wilsons' use of their groundwater wells. And these well and surface water impacts do not stand alone; the same land disturbing, construction and operation activities that destabilized and polluted the aquifer also generated intrusive dust plumes, persistent industrial noise, and high-intensity nighttime lighting; each of which has independently and cumulatively impaired the families' ability to use and enjoy their homes.

Your improper construction, development, and operation of the Stanton Springs Data Center, including each of the injuries, harms, and conditions detailed above constitute both a nuisance and a trespass. Under O.C.G.A. § 41-1-1 et seq., a nuisance includes any activity that unreasonably interferes with another's use and enjoyment of private property, regardless of whether the conduct occurs on an adjoining parcel. Likewise, Georgia trespass law, O.C.G.A. § 51-9-1 et seq., recognizes that a physical invasion of land can occur through subsurface intrusion, including the migration of soil, fluids, silt, sediment, vibrations, dust, noise, light, and other disturbances generated by construction activity. The conditions described herein are both a nuisance and a trespass, and continue to harm the Morris and Wilson families on a daily basis.

As set forth above, your explosive blasting performed at least in March 2024 approximately 1.1 miles from the affected homes consisted of the removal/disruption of at least 155,000 cubic yards of rock and dirt. Georgia law has long recognized that blasting with explosives is a quintessential ultrahazardous activity that carries strict liability for all resulting harms, regardless of the degree of care exercised. This is true whenever vibrations, air blast, concussive forces, or related effects cause injury to nearby homes, wells, structures, or land. Blasting produces high energy shockwaves and ground vibrations that travel through soil and bedrock. In undertaking blasting to develop Stanton Springs, Meta (and its affiliated entities) and contractors assumed strict liability for all resulting impacts to adjacent residential properties, including disturbances of groundwater, sediment mobilization, well impairment, structural

vibrations, nuisance, physical displacement of soil or water, and the resultant harms sustained by the Morris and Wilson families as exhaustively set out in this letter.

Preservation of records

We are hopeful that the parties can find an amicable solution to these issues. Nevertheless, this letter is notice of your legal obligation to preserve all records relevant to this matter. If you fail to properly secure and preserve this evidence, it will constitute spoliation and give rise to a legal presumption that the evidence would have been harmful to your side of the case. This includes, but is not limited to

- Blasting report(s), including pre-blast report, drilling logs, post-blast records, and other documentation required by law concerning the blasting conducted at Stanton Springs in 2024 or any other blasting that occurred at or near Stanton Springs, including the West Campus and East Campus sites or nearby areas;
- Any correspondence, photos and videos, construction drawings, engineering plans, as-built records, inspection reports, applications, and permits relating to the Stanton Springs Data Center East Campus or West Campus, including but not limited to excavation / drilling records for the installation of fiber optic cables, underground pipes and infrastructure, slab foundation and erection of multi-story warehouse structures, and installation, maintenance and operation of surface water ponds / impoundments;
- Notes, memos, email correspondence, video recordings, audio recordings, or photographs relative to either the Wilson Property or the Morris Property, including any recordings of visits among representatives of Meta or contractors engaged on its behalf and Beverly Morris;
- Permits and permit applications relating to the East Campus, including land disturbing permits, construction permits, inspection records, and communications with regulators and agency representatives;
- Pre- and Post-construction surveys or Impact Assessments bearing on ambient light and noise for the East Campus, including assessments of Low Frequency Noise (LFN) and Infrasound, detailing low-frequency metrics assessed, LFN or vibration effects modeling, and mitigation measures considered or implemented, such as Acoustic Barriers or sound dispersion equipment or measures; and
- Records of maintenance of surface water ponds on the Stanton Springs East Campus, including memos, emails, letters, work orders/repair and maintenance logs related to any actual or suspected leaks or structural compromises to any surface water pond at the East Campus.

Conclusion

The harms sustained by the Morris and Wilson families are continuing. Given the enormity of the sediment, silt, disturbed soils and groundwater that is believed to be unleashed by the Stanton Springs development project across the street from their homes, these families quite reasonably expect that injuries to their property interests, as well as the hurt, annoyance and inconvenience they have sustained will continue unless and until you immediately take measures to abate and rectify the ongoing encroachment of the Morris' and Wilsons' land, air, surface water and groundwater.

The street address for Building 1 at the East Campus is 100 *Move Fast* Way, Social Circle Georgia, 30025. In taking this "Move Fast" approach, you have failed to undertake reasonable, proper accounting of the harmful impacts that Stanton Springs is having on its neighbors – the Morris' and Wilsons. Now is the time to cease these harms. In that vein, we look forward to working with you toward a prompt and amicable resolution of this matter, so that these families can be made whole and put an end to a saga that they neither asked for, nor deserve. Should you act promptly and in good faith, the Morris' and Wilsons are committed to doing the same.

Any correspondence regarding this matter should be directed to the undersigned counsel at the address set forth above. Please respond to this demand and request to schedule a meeting to discuss the means of ceasing these conditions and resolving these harms by no later than January 16, 2026.

Sincerely,



Christopher J. Bowers

cc: George Lott
Stacey Evans

Enclosures (appended figures)

Attachments

Figure 1

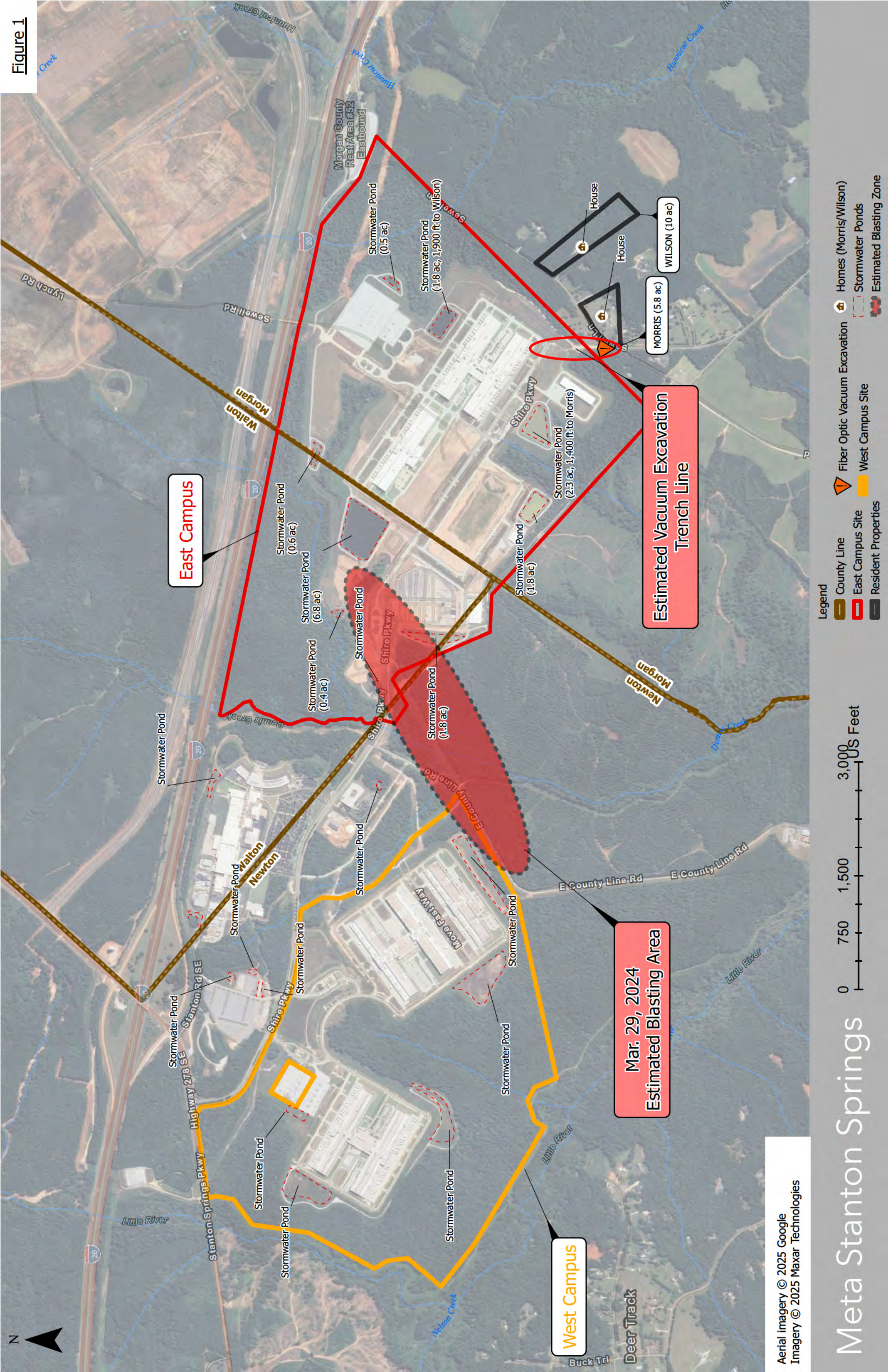
Figure 2

Figure 3

Figure 4

Figure 5

Figure 12

[illegible]

Aerial imagery © 2025 Google
Imagery © 2025 Maxar Technologies

Meta Stanton Springs

Legend

- County Line
- East Campus Site
- Resident Properties
- Fiber Optic Vacuum Excavation
- West Campus Site
- Homes (Morris/Wilson)
- Stormwater Ponds
- Estimated Blasting Zone

JAN 2018

East Campus

West Campus

Morgan County Res Area #52 Eastbound

Walton Morgan

Newton Morgan

Sewell Ln

Shire Pkwy

E County Line Rd

Stanton Rd SE

Highway 278 SE

Little River

Duck Creek

Dennis Creek

House

MORRIS (5.8 ac)

WILSON (10 ac)

Deer Track

Buck Trl

Meta Stanton Springs

Esri, Inc. (2025). World Imagery (Wayback) [Imagery layer].
Imagery acquisition date: Jan 2018.
<https://wayback.maptiles.arcgis.com/>

Legend

- County Line
- Resident Properties
- Homes (Morris/Wilson)
- Potable Wells
- East Campus Site
- West Campus Site

Scale: 0, 875, 1,750, 3,500 Feet

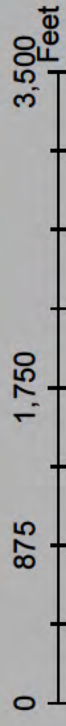
Figure 2



Esri, Inc. (2025). World Imagery (Wayback) [Imagery layer].
Imagery acquisition date: Jan 2018.
<https://wayback.maptiles.arcgis.com/>

Meta Stanton Springs

Legend



Homes (Morris/Wilson)

Resident Properties

County Line

3,500 Feet

1,750

875

0 -

57

Ω₂

to

5



Figure 3



Figure 3

Figure 3

Figure 3

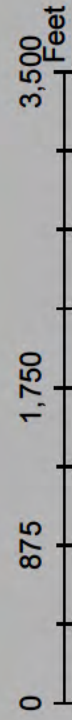


- ### Figure 3



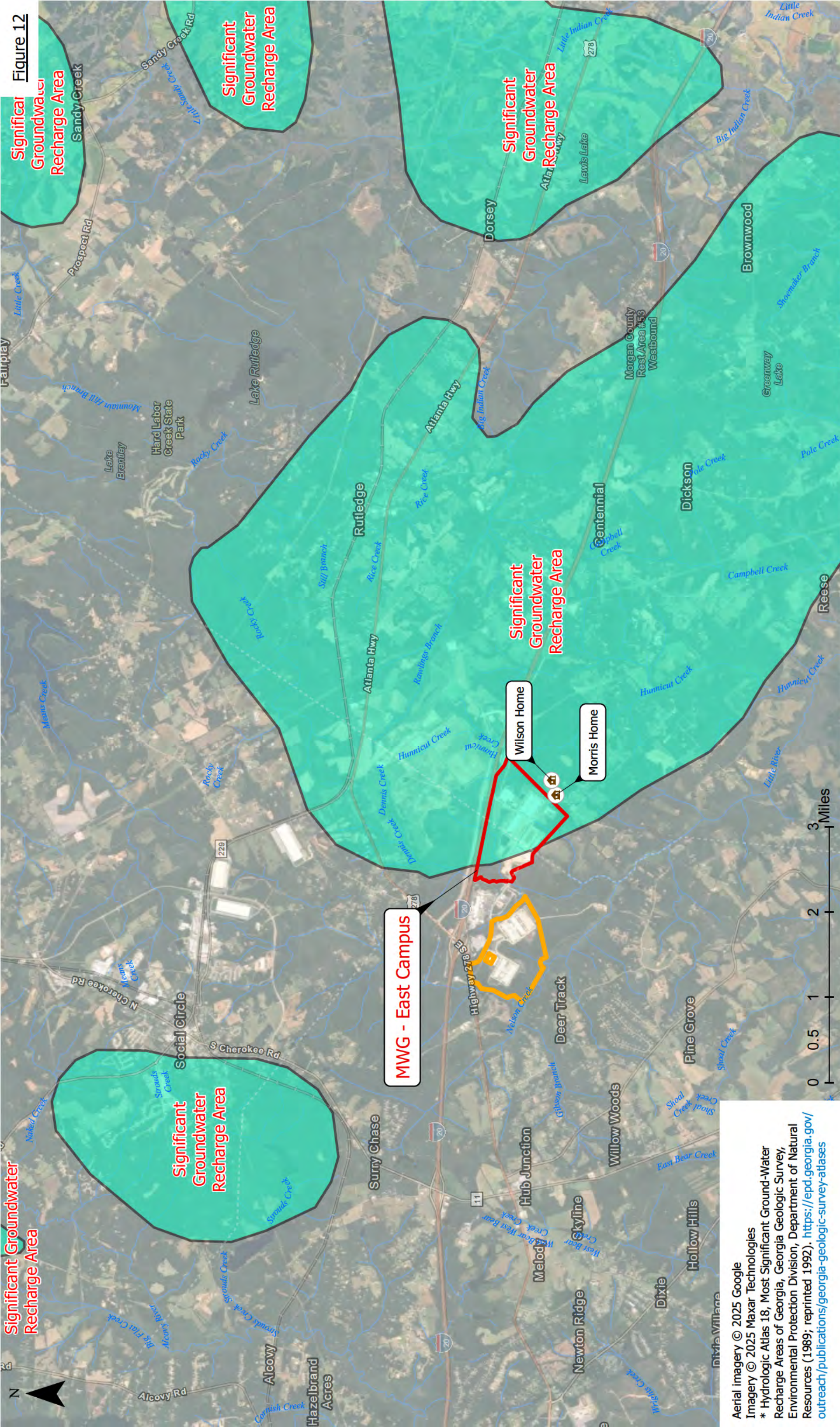
Legend

- County Line
- East Campus Site
- Resident Properties
- Homes (Morris/Wilson)
- West Campus Site
- Potable Wells



Esri, Inc. (2025). World Imagery (Wayback) [Imagery layer].
Imagery acquisition date: Feb 2023.
<https://wayback.maptiles.arcgis.com/>

Meta Stanton Springs



Aerial imagery © 2025 Google
Imagery © 2025 Maxar Technologies
* Hydrologic Atlas 18, Most Significant Ground-Water Recharge Areas of Georgia, Georgia Geologic Survey, Environmental Protection Division, Department of Natural Resources (1989; reprinted 1992). <https://epd.georgia.gov/outreach/publications/georgia-geologic-survey-atlases>