

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
PENNSYLVANIA

JCB, Lee Ann Boyer v. Quakertown Community School District

No. 2:23-cv-00372 (E.D. Pa. Dec. 12, 2025) · No. 2:23-cv-00372 · Decided December 12, 2025

SUMMARY

The Eastern District of Pennsylvania granted Quakertown Community School District’s motion for summary judgment in a dispute concerning whether the district denied JCB a free appropriate public education under the IDEA. The court held that the parent had not shown sufficient grounds to depart from the hearing officer’s findings and that the challenged IEPs were reasonably calculated to provide educational benefit. The court also rejected the Section 504 and ADA claims for lack of evidence of deliberate indifference and dismissed claims brought on behalf of the minor child without prejudice because the parent could not represent the child pro se.

CASE DETAILS

COURT	United States District Court for the Eastern District of Pennsylvania
WRITING FOR THE COURT	Kelley B. Hodge
JURISDICTION	United States District Court for the Eastern District of Pennsylvania
DECIDED	December 12, 2025
DOCKET	2:23-cv-00372
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiffs appealed a Pennsylvania special-education hearing officer's denial of their IDEA due-process claims. The District moved for summary judgment on the administrative record, and Plaintiffs sought summary judgment in their favor.
STANDARD OF REVIEW	IDEA claims are reviewed under a modified de novo standard. Administrative factual findings receive due weight and are prima facie correct; the reviewing court must explain any departure from them and makes its own findings by a preponderance of the evidence. Legal conclusions receive plenary review. The party challenging the administrative decision bears the burden of persuasion. The Section 504 and ADA claims were reviewed under Federal Rule of Civil Procedure 56(a).
PRECEDENTIAL VALUE	unpublished

PARTIES

JCB, Lee Ann Boyer v. Quakertown Community School District

TOPICS

administrative law

summary judgment

ada / disability

civil rights

pleadings

PRACTICE AREAS

education law

disability discrimination

civil procedure

administrative law

QUESTIONS PRESENTED

1. Whether the Hearing Officer's determination that Quakertown provided JCB a FAPE under the IDEA should be affirmed.
2. Whether a non-lawyer parent may represent her minor child pro se in federal court.
3. Whether Plaintiffs presented sufficient evidence to establish intentional discrimination or deliberate indifference under Section 504 of the Rehabilitation Act and the ADA.
4. Whether Plaintiffs supported their unspecified state anti-discrimination claims.

HOLDINGS

1. A non-lawyer parent may proceed pro se only on claims brought on the parent's own behalf and may not represent the parent's minor child in federal court. Claims brought on behalf of JCB must therefore be dismissed without prejudice.
2. Quakertown's successive IEPs complied with the procedural and substantive requirements of the IDEA and were reasonably calculated to provide JCB meaningful educational benefit. Plaintiffs did not present sufficient evidence to warrant departing from the Hearing Officer's factual findings, and the Hearing Officer's decision was affirmed.
3. Plaintiffs failed to establish intentional discrimination or deliberate indifference under Section 504 and the ADA. The District was entitled to judgment as a matter of law on those claims.

KEY QUOTATIONS

"The Court applies a "modified de novo standard of review" in reviewing a state hearing officer's administrative decision under the IDEA." (Section II)

"The purpose is to ensure that SDI was provided and if so, FAPE was met." (Section III.B)

"For the foregoing reasons, Quakertown's Motion for Summary Judgment is granted." (Section IV)

FACTUAL BACKGROUND

JCB received early-intervention services for developmental delay and had preschool IEPs providing speech therapy and specialized instruction through push-in services. In preparation for kindergarten, Quakertown proposed and then modified an IEP based on the information available before and during the COVID-19 school closures; the parents approved the modified July 2020 IEP. After JCB began kindergarten, he exhibited

significant behavioral dysregulation, including elopement, destructive conduct, mask refusal, and an incident requiring physical restraint. Quakertown initiated reevaluation, added a functional behavioral assessment and additional supports, and implemented a revised IEP in February 2021, after which JCB's behavior improved substantially.

PROCEDURAL HISTORY

JCB's mother filed an IDEA due-process complaint challenging the District's provision of a free appropriate public education. After a due-process hearing, Hearing Officer Charles W. Jelley denied all requested relief. Boyer appealed to federal district court and added claims under Section 504, the ADA, and unspecified state anti-discrimination laws. The court previously dismissed Staffieri with prejudice and allowed amendment of compensatory-education and attorney-fee claims. The court granted Quakertown's motion for summary judgment.

DISPOSITION

other

CASES CITED

- D.K. v. Abington School District, 696 F.3d 233, 243 (3d Cir. 2012)
- D.S. v. Bayonne Board of Education, 602 F.3d 553, 557, 564 (3d Cir. 2010)
- J.D.G. v. Colonial School District, 748 F. Supp. 2d 362, 372 (D. Del. 2010)
- Ridley School District v. M.R., 680 F.3d 260, 269-70 (3d Cir. 2012)
- Shore Regional High School Board of Education v. P.S. ex rel. P.S., 381 F.3d 194, 199 (3d Cir. 2004)
- Burton v. Teleflex Inc., 707 F.3d 417, 425 (3d Cir. 2013)
- Celotex Corp. v. Catrett, 477 U.S. 317, 322 (1986)
- Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 255 (1986)
- Osei-Afryie by Osei-Afryie v. Medical College of Pennsylvania, 937 F.2d 876, 883 (3d Cir. 1991)
- Winkelman ex rel. Winkelman v. Parma City School District, 550 U.S. 516, 524, 535 (2007)
- Board of Education of Hendrick Hudson Central School District v. Rowley, 458 U.S. 176, 181 (1982)
- Carlisle Area School District v. Scott P., 62 F.3d 520, 533-34 (3d Cir. 1995)
- Mary T. v. School District of Philadelphia, 575 F.3d 235, 251 (3d Cir. 2009)
- JKG v. Wissahickon School District, No. 2:19-cv-05296, 2021 WL 1122526, at *5 (E.D. Pa. Mar. 24, 2021)
- K.C. ex rel. Her Parents v. Nazareth Area School District, 806 F. Supp. 2d 806, 813-14 (E.D. Pa. 2011)
- Chughtai v. Obama, 153 F. Supp. 3d 765, 768 n.4 (E.D. Pa. 2015)
- United States v. Bradley, 505 F. App'x 220, 221 n.1 (3d Cir. 2012)
- Annika T. v. Unionville Chadds-Ford School District, No. 08-4944, 2009 WL 778350, at *3-4 (E.D. Pa. Mar. 24, 2009)
- A.G. v. Lower Merion School District, No. 11-5025, 2011 WL 6412144, at *4 (E.D. Pa. Dec. 20, 2011)

- Woodruff ex rel. B.W. v. Hamilton Township Public School, No. CIV.A. 06-3815, 2007 WL 4556968, at *4 (D.N.J. Dec. 20, 2007)
- D.E. v. Central Dauphin School District, 765 F.3d 260, 269 (3d Cir. 2014)

Retrieved from lawtools.ai · <https://lawtools.ai/cases/federal/united-states-district-court-for-the-eastern-district-of-pen/2025/jcb-lee-ann-boyer-v-quakertown-community-school-district-13u1dij4>