

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Jackson v. District of Columbia

Civil Action No. 25-302 (EGS) (D.D.C. Feb. 23, 2026) · No. Civil Action No. 25-302 (EGS) · Decided February 23, 2026

SUMMARY

The United States District Court for the District of Columbia grants Defendants’ motion for partial summary judgment in Jacqueline Jackson’s employment-related action. The court holds that Jackson’s tort and hate-crime claims against the District, and against individual defendants in their official capacities to the extent applicable, are barred by her failure to comply with the notice requirements of D.C. Code § 12-309.

CASE DETAILS

COURT	United States District Court for the District of Columbia
WRITING FOR THE COURT	Emmet G. Sullivan
JURISDICTION	United States District Court for the District of Columbia
DECIDED	February 23, 2026
DOCKET	Civil Action No. 25-302 (EGS)
DISPOSITION	other
PROCEDURAL POSTURE	Defendants moved for partial summary judgment on the plaintiff's District of Columbia-law claims, arguing that the claims were barred by the notice requirement in D.C. Code § 12-309. The plaintiff did not oppose the motion.
STANDARD OF REVIEW	Summary judgment is proper when there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law. The nonmoving party must come forward with specific facts showing a genuine issue for trial.
PRECEDENTIAL VALUE	published
PARTIES	Jacqueline Jackson v. District of Columbia, Katie Lundgren, Doris Peña

TOPICS

summary judgment

sovereign immunity

civil procedure

negligence

intentional infliction of emotional distress

PRACTICE AREAS

civil procedure

civil rights

torts

municipal law

employment law

QUESTIONS PRESENTED

1. Whether Jackson's District of Columbia-law claims against the District were barred by her failure to comply with the written-notice requirement of D.C. Code § 12-309.
2. Whether the same notice requirement barred the claims against the individual defendants to the extent they were sued in their official capacities.

HOLDINGS

1. Jackson's claims in Counts 8, 9, 10, and 11 against the District were barred because she failed to provide the notice required by D.C. Code § 12-309.
2. To the extent Jackson sued Lundgren and Peña in their official capacities, the claims were also barred by her failure to comply with D.C. Code § 12-309 because an official-capacity suit is treated as a suit against the District.

KEY QUOTATIONS

“Summary judgment is proper when “there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law.”” (2)

“an action may not be maintained against the District of Columbia for unliquidated damages to person or property unless, within six months after the injury or damage was sustained, the claimant, his agent, or attorney has given notice in writing to the Mayor of the District of Columbia of the approximate time, place, cause, and circumstances of the injury or damage.” (3)

““Th[is] notice requirement is a prerequisite to a suit against the District of Columbia ‘because it represents a waiver of sovereign immunity.’”” (3)

FACTUAL BACKGROUND

Jacqueline Jackson worked as an educational aide or paraprofessional at Marie Reed Elementary School, a District of Columbia public school. She asserted several claims, including intentional and negligent infliction of emotional distress, negligence, and violation of the District's hate-crime statute. The District's Office of Risk Management searched its records and found no written notice of Jackson's claims, acknowledgment letter, claim number, or other record of notice. Jackson did not dispute those facts and stated that she would not oppose summary judgment on her tort claims.

PROCEDURAL HISTORY

Jackson filed an employment-related complaint asserting federal, District of Columbia, and tort claims against the District, a school principal, and a colleague. Defendants moved for partial summary judgment on Counts 8 through 11. Jackson did not respond to the motion or to defendants' statement of undisputed facts. The court deemed the facts undisputed for purposes of the motion and granted partial summary judgment.

DISPOSITION

other

CASES CITED

- Frito-Lay, Inc. v. Willoughby, 863 F.2d 1029, 1034 (D.C. Cir. 1988)
- Matsushita Elec. Indus. Co. v. Zenith Radio Corp., 475 U.S. 574, 586-87 (1986)
- Blocker-Burnette v. District of Columbia, 730 F. Supp. 2d 200, 203 (D.D.C. 2010)
- Faison v. District of Columbia, 664 F. Supp. 2d 59, 68 (D.D.C. 2009)
- Barnhardt v. District of Columbia, 601 F. Supp. 2d 324, 329 (D.D.C. 2009)
- Gwinn v. District of Columbia, 434 A.2d 1376, 1378 (D.C. 1981)
- District of Columbia v. Dunmore, 662 A.2d 1356, 1362 (D.C. 1995)
- Crockett v. District of Columbia, Civil Action No. 16-1357, 2020 WL 1821121, at *7 (D.D.C. Apr. 10, 2020)