

SUPREME COURT OF OKLAHOMA

Ford, et al. v. The Oklahoma State Department of Education, et al.

Ford, 2026 OK 35 (Okla. 2026) · No. 123278 · Decided May 12, 2026

SUMMARY

The Oklahoma Supreme Court held that plaintiffs' challenge to the Oklahoma Social Studies Standards of 2025 was moot because the standards no longer existed. The Court found that no exception to mootness applied, dismissed the appeal, and reversed the district court's judgment with directions to enter a dismissal without prejudice. Several justices concurred, while Justices Kane and Jett dissented in part from the decision to vacate the lower court ruling.

CASE DETAILS

COURT	Supreme Court of Oklahoma
WRITING FOR THE COURT	Edmondson, J.; Rowe, C.J.; Kuehn, V.C.J.; Winchester, J.; Combs, J.; Gurich, J.; Darby, J.
JURISDICTION	Supreme Court of Oklahoma
DECIDED	May 12, 2026
DOCKET	123278
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiffs appealed from a district court judgment denying their request for an injunction and granting defendants' motions to dismiss. The Oklahoma Supreme Court retained the appeal and dismissed it as moot, while reversing the district court's judgment with directions to enter a dismissal without prejudice.
STANDARD OF REVIEW	The court reviewed the justiciability and mootness of the appeal and the propriety of the district court's dismissal. Mootness is a jurisdictional and justiciability issue requiring dismissal when the controversy no longer exists and no exception applies.
PRECEDENTIAL VALUE	Published opinion, but the source states that it has not been released for publication and remains subject to revision or withdrawal.
PARTIES	Diane Ford, Ainsley Hoover, Lillian Lang, Jack Ramey, Jennie Scott, James Welch, IV, Alana Westfall v. The Oklahoma State Department of Education, The Oklahoma State Board of Education, Lindel Fields, in

his official capacity as State Superintendent of Public Instruction and
Chair of the Oklahoma State Board of Education

TOPICS

mootness appellate procedure administrative law declaratory judgment injunctions

PRACTICE AREAS

Appellate procedure Administrative law Civil procedure Equitable remedies

QUESTIONS PRESENTED

1. Whether plaintiffs' appeal challenging the 2025 Social Studies Standards and seeking declaratory and injunctive relief became moot because the standards no longer existed.
2. Whether an exception to mootness applied based on the potential repetition of the controversy while evading review.
3. Whether the public-interest exception to mootness applied.
4. Whether the district court's judgment should be reversed and the petition dismissed without prejudice after the appeal became moot.

HOLDINGS

1. The appeal was moot because the challenged 2025 Social Studies Standards no longer existed, leaving no effective injunctive or declaratory relief for the court to grant.
2. Neither the exception for issues capable of repetition while evading review nor the substantial-public-interest exception applied.
3. The district court judgment was reversed, and the district court was directed to enter a new judgment dismissing plaintiffs' petition as moot without prejudice.

KEY QUOTATIONS

"We conclude plaintiffs' action challenging the Social Studies Standards of 2025 and requesting injunctive and declaratory relief is moot because the 2025 Social Studies Standards no longer exist." (§1)

"Munsingwear explained an appellate court may dismiss a moot appeal and vacate a judgment with directions to dismiss the trial court action without prejudice upon remand because it "clears the path for future litigation of issues between the parties and eliminates a judgment, review of which was prevented through happenstance."" (§24)

"We conclude plaintiffs' action challenging the Social Studies Standards of 2025 and requesting injunctive and declaratory relief is moot because the Social Studies Standards no longer exist." (§30)

FACTUAL BACKGROUND

The Oklahoma State Board of Education approved the Social Studies Standards of 2025 on February 27, 2025. Plaintiffs challenged those standards, alleging statutory and constitutional violations and seeking declaratory and injunctive relief. During the appeal, the standards no longer existed after *Randall v. Fields* held that they could not be enforced.

PROCEDURAL HISTORY

Plaintiffs challenged Oklahoma's 2025 Social Studies Standards and sought declaratory and injunctive relief in the District Court for Oklahoma County. The district court denied injunctive relief and granted defendants' motions to dismiss. While the appeal was pending, the 2025 Standards ceased to exist following *Randall v. Fields*, and the Supreme Court concluded that no effective relief or mootness exception remained available.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The District Court for Oklahoma County must enter a new judgment dismissing plaintiffs' petition as moot and without prejudice.

CASES CITED

- *Randall v. Fields*, 2025 OK 91, 581 P.3d 109
- *State ex rel. Oklahoma Firefighters Pension and Retirement System v. City of Spencer*, 2009 OK 73, 237 P.3d 125
- *Already, LLC v. Nike, Inc.*, 568 U.S. 85, 133 S. Ct. 721, 184 L. Ed. 2d 553 (2013)
- *Federal Bureau of Investigation v. Fikre*, 601 U.S. 234, 144 S. Ct. 771, 218 L. Ed. 2d 162 (2024)
- *Colorado River Water Conservation District v. United States*, 424 U.S. 800, 817, 96 S. Ct. 1236, 47 L. Ed. 2d 483 (1976)
- *Friends of the Earth, Inc. v. Laidlaw Environmental Services (TOC), Inc.*, 528 U.S. 167, 189, 120 S. Ct. 693, 145 L. Ed. 2d 610 (2000)
- *United States v. W. T. Grant Co.*, 345 U.S. 629, 632-633, 73 S. Ct. 894, 97 L. Ed. 1303 (1953)
- *Oklahoma Electric Cooperative v. State ex rel. Oklahoma Corporation Commission*, 2025 OK 60, 578 P.3d 1201
- *Truttman v. City of McAlester*, 1952 OK 149, 243 P.2d 355
- *Wells v. Childers*, 1945 OK 365, 165 P.2d 371
- *Mitchell v. Wall*, 808 F.3d 1174 (7th Cir. 2015)
- *Gjertsen v. Board of Election Commissioners*, 751 F.2d 199 (7th Cir. 1984)
- *United States v. Munsingwear, Inc.*, 340 U.S. 36, 71 S. Ct. 104, 95 L. Ed. 36 (1950)
- *Saxon v. Macy*, 1990 OK 60, 795 P.2d 101
- *Grisham v. City of Oklahoma City*, 2017 OK 69, 404 P.3d 843

- House of Realty, Inc. v. City of Midwest City, 2004 OK 97, 109 P.3d 314
- Tulsa Industrial Authority v. City of Tulsa, 2011 OK 57, 270 P.3d 113
- City of Broken Arrow v. Bass Pro Outdoor World, L.L.C., 2011 OK 1, 250 P.3d 305
- Dutton v. City of Midwest City, 2015 OK 51, 353 P.3d 532
- Grider v. USX Corp., 1993 OK 13, 847 P.2d 779
- Federal Bureau of Investigation v. Fikre, 601 U.S. 234 (2024)
- Ramirez v. Collier, 595 U.S. 411, 434, 142 S. Ct. 1264, 212 L. Ed. 2d 262 (2022)
- Lawrence v. Cleveland County Home Loan Authority, 1981 OK 28, 626 P.2d 314
- Childers v. Wallace, 1946 OK 162, 169 P.2d 186
- Pike Off OTA, Inc. v. Oklahoma Turnpike Authority, 2023 OK 57, 531 P.3d 107
- Morrison v. Board of Education of Independent School District No. 6, 1967 OK 36, 424 P.2d 963

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