

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
TENNESSEE

L.J., a minor, by and through his next friend and Mother, Cetera Jones; and Cetera Jones, individually v. Memphis-Shelby County Schools; Bryant Parker, School Resource Officer, in his individual capacity; Nekia Patton, in her individual capacity; Rhonda Mitchell, in her individual capacity; and John/Jane Does 1–10

L.J. · No. 2:25-cv-03070-SHL-tmp · Decided March 3, 2026

SUMMARY

The United States District Court for the Western District of Tennessee denied Plaintiffs L.J. and Cetera Jones’s motion for expedited discovery before the Rule 26(f) conference. The Court held that Plaintiffs had not shown good cause because the known officer had been identified, the remaining identities could be discovered through ordinary discovery, and the defendant school district was already subject to a duty to preserve electronically stored information.

CASE DETAILS

COURT	United States District Court for the Western District of Tennessee
WRITING FOR THE COURT	Sheryl H. Lipman
JURISDICTION	United States District Court for the Western District of Tennessee
DECIDED	March 3, 2026
DOCKET	2:25-cv-03070-SHL-tmp
DISPOSITION	denied
PROCEDURAL POSTURE	Plaintiffs moved under Federal Rule of Civil Procedure 26(d)(1) for leave to conduct expedited discovery before the Rule 26(f) conference to identify unknown defendants and preserve electronically stored information. The court denied the motion for lack of good cause.
STANDARD OF REVIEW	Good cause is required for court-authorized discovery before the Rule 26(f) conference; expedited discovery is warranted when it is necessary for the case to proceed, including to identify unknown defendants.
PRECEDENTIAL VALUE	unpublished district court order; persuasive only

PARTIES

L.J., a minor, by and through his next friend and mother, Cetera Jones, Cetera Jones, individually v. Memphis-Shelby County Schools, Bryant Parker, School Resource Officer, in his individual capacity, Nekia Patton, in her individual capacity, Rhonda Mitchell, in her individual capacity, John/Jane Does 1–10

TOPICS

discovery dispute civil procedure service of process civil rights ada / disability

PRACTICE AREAS

federal civil procedure discovery civil rights disability discrimination

QUESTIONS PRESENTED

1. Whether Plaintiffs demonstrated good cause for expedited discovery before the Rule 26(f) conference to identify unknown defendants.
2. Whether the need to preserve electronically stored information justified expedited discovery before the Rule 26(f) conference.

HOLDINGS

1. A party seeking court-authorized discovery before the Rule 26(f) conference must demonstrate good cause, and good cause requires showing that the requested discovery is necessary for the case to proceed, including when discovery is needed to identify unknown defendants. Plaintiffs did not make that showing because they had already identified the school resource officer and could identify the remaining personnel through ordinary discovery after the Rule 26(f) conference.
2. The possibility that relevant electronically stored information should be preserved did not establish good cause for expedited discovery because the defendant school district was already under a duty to preserve electronically stored information.

KEY QUOTATIONS

“A party shows good cause sufficient to obtain discovery before a Rule 26(f) conference if the requested discovery is necessary to determine an opposing party’s identity to allow the case to proceed.”

“Thus, expedited discovery may be helpful to Plaintiffs, but it has not yet been shown to be necessary.”

“For the foregoing reasons, the Court does not find good cause for expedited discovery.”

FACTUAL BACKGROUND

L.J., a second-grade student receiving special education services under an individualized education program, allegedly experienced a disability-related behavioral episode at Levi Elementary School on November 22, 2024. Plaintiffs alleged that school resource officer Bryant Parker responded by throwing L.J. into a bookcase and onto the ground, wrenching his arms behind his back, and handcuffing him. Plaintiffs sought early discovery to

identify school administrators or staff who allegedly sought or directed Parker's actions and to preserve electronically stored information.

PROCEDURAL HISTORY

Plaintiffs filed this action on November 21, 2025, asserting claims arising from an alleged use of force against L.J. at Levi Elementary School. They moved for expedited discovery on November 25, 2025, while the identity of the school resource officer and other school personnel was allegedly unknown. By the time of the amended complaint, Plaintiffs had identified Bryant Parker as the school resource officer, and he was later served. The court denied expedited discovery because Plaintiffs had not shown that it was necessary for the case to proceed and because the school district already had a duty to preserve electronically stored information.

DISPOSITION

denied

CASES CITED

- Arista Records, LLC v. Does 1–15, No. 07-CV-450, 2007 WL 5254326, at *2 (S.D. Ohio May 17, 2007)
- Simpson v. Doe #1–2, No. 21-10877, 2021 WL 8084521, at *1–2 (E.D. Mich. May 7, 2021)
- Georgia Film Fund Four, LLC v. Does 1–17, No. 13-cv-184, 2013 WL 5937979, at *2 (E.D. Tenn. Nov. 5, 2013)
- Robinson v. Doe, 2008 WL 5069249, at *2 (S.D. Ohio Nov. 24, 2008)