

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
CALIFORNIA

Morgan Hill Concerned Parents Association v. California
Department of Education

Morgan Hill · No. 18-cv-03367-VC · Decided June 9, 2025

SUMMARY

The United States District Court for the Northern District of California granted the California Department of Education’s motion to dismiss Morgan Hill Concerned Parents Association’s action for lack of jurisdiction. The court held that the complaint failed to adequately allege associational standing because it did not identify an injured member, and further concluded that the action was moot because the children referenced in the complaint had largely aged out of the school system and the relevant monitoring system had substantially changed. The dismissal was without prejudice.

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	Vince Chhabria
JURISDICTION	United States District Court for the Northern District of California
DECIDED	June 9, 2025
DOCKET	18-cv-03367-VC
DISPOSITION	dismissed
PROCEDURAL POSTURE	The district court granted the California Department of Education's motion to dismiss and dismissed the case for lack of jurisdiction.
STANDARD OF REVIEW	The court reviewed the sufficiency of the complaint to determine whether associational standing was adequately alleged and whether the action remained justiciable. Because standing and mootness are jurisdictional issues, the dismissal was for lack of subject-matter jurisdiction.
PRECEDENTIAL VALUE	unpublished district court order
PARTIES	Morgan Hill Concerned Parents Association v. California Department of Education

TOPICS

standing

subject matter jurisdiction

motions to dismiss

civil procedure

administrative law

PRACTICE AREAS

civil procedure

civil rights

administrative law

education law

QUESTIONS PRESENTED

1. Whether the complaint adequately alleged associational standing by identifying at least one specific member who suffered or would suffer harm.
2. Whether the narrow NAACP v. State of Alabama exception to identifying individual members applied.
3. Whether the action was moot because the identified children had aged out of the school system and the challenged monitoring system had materially changed.

HOLDINGS

1. An association must make specific allegations identifying at least one member who has suffered or would suffer harm; an exhibit describing unnamed children does not satisfy that requirement when the complaint does not identify the children as members or identify their parents.
2. The exception allowing an association to avoid naming individual members did not apply because the association and its members were not shown to be identical in every practical sense and the requested relief would not necessarily affect every member's child.
3. The action was moot because nearly all of the seventeen children described in the exhibit had aged out of the school system and the challenged monitoring system had substantially changed during the thirteen years of federal-court oversight.

KEY QUOTATIONS

“To adequately allege associational standing, Morgan Hill Concerned Parents Association (MHCPA) MHCPA must include in its complaint “specific allegations establishing that at least one identified member had suffered or would suffer harm.””

“Because the case is dismissed for lack of jurisdiction, by definition the dismissal is without prejudice.”

FACTUAL BACKGROUND

The complaint alleged that Morgan Hill Concerned Parents Association represented parents of children with disabilities throughout California and sought injunctive relief requiring improved California Department of Education policies under the Individuals with Disabilities Education Act. An exhibit described the experiences of seventeen children with disabilities but did not identify them as members of the association or identify their parents. By 2025, nearly all of those children had aged out of the school system, and the Department's monitoring system had substantially changed under federal-court oversight in the Emma C. litigation.

PROCEDURAL HISTORY

Morgan Hill Concerned Parents Association brought an action challenging California Department of Education policies under the Individuals with Disabilities Education Act. The operative complaint was filed on April 23, 2012. The court concluded that the complaint failed to establish associational standing and that the action was independently moot because the identified children had largely aged out of the school system and the challenged monitoring system had materially changed. The action was dismissed without prejudice.

DISPOSITION

dismissed

CASES CITED

- Associated General Contractors of America v. California Department of Transportation, 713 F.3d 1187, 1194-1195 (9th Cir. 2013)
- Summers v. Earth Island Institute, 555 U.S. 488, 498 (2009)
- NAACP v. State of Alabama ex rel. Patterson, 357 U.S. 449, 459 (1958)
- N.D. v. Reykdal, 102 F.4th 982, 990 (9th Cir. 2024)
- Emma C. v. Thurmond, 621 F. Supp. 3d 982 (N.D. Cal. 2018)
- Emma C. v. Thurmond, 393 F. Supp. 3d 885 (N.D. Cal. 2019)
- Emma C. v. Thurmond, 472 F. Supp. 3d 641 (N.D. Cal. 2020)
- Emma C. v. Thurmond, 668 F. Supp. 3d 902 (N.D. Cal. 2023)
- Emma C. v. Thurmond, No. 96-CV-04179, 2024 WL 3560720 (N.D. Cal. July 26, 2024)
- Emma C. v. Thurmond, No. 96-CV-04179, 2024 WL 5103092 (N.D. Cal. Oct. 28, 2024)
- Order Vacating Consent Decree and Terminating Federal Court Oversight, Emma C. v. Thurmond, No. 96-CV-04179 (N.D. Cal. Dec. 17, 2024)

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