

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF HAWAI‘I

Zavior Ward v. Interscholastic League of Honolulu, et al.

Ward · No. Civil No. 25-00415 MWJS-WRP · Decided March 6, 2026

SUMMARY

The United States District Court for the District of Hawai‘i denied the Interscholastic League of Honolulu’s motion for judgment on the pleadings in Zavior Ward’s procedural due process action. The court held that it was premature to decide, without further factual development, whether Ward had a constitutionally protected property interest in participating in interscholastic athletics under Hawai‘i or federal law. The court also denied Hawaii Baptist Academy’s motion to join the motion as moot.

CASE DETAILS

COURT	United States District Court for the District of Hawai‘i
WRITING FOR THE COURT	Micah W.J. Smith
JURISDICTION	United States District Court for the District of Hawai‘i
DECIDED	March 6, 2026
DOCKET	Civil No. 25-00415 MWJS-WRP
DISPOSITION	other
PROCEDURAL POSTURE	Defendant ILH moved for judgment on the pleadings under Federal Rule of Civil Procedure 12(c). HBA moved to join ILH's motion. The court denied ILH's motion and denied HBA's joinder motion as moot.
STANDARD OF REVIEW	A Rule 12(c) motion is evaluated under the same standard as a Rule 12(b)(6) motion. The court accepts material factual allegations as true and construes them in the plaintiff's favor. Judgment is proper only when the pleadings clearly establish that no material factual issue remains and that the moving party is entitled to judgment as a matter of law.
PRECEDENTIAL VALUE	unpublished district court order; persuasive authority only
PARTIES	Interscholastic League of Honolulu (ILH), Hawaii Baptist Academy (HBA) v. Zavior Ward

TOPICS

- motion for judgment on the pleadings
- procedural due process
- due process
- civil procedure
- civil rights

PRACTICE AREAS

Civil procedure

constitutional law

civil rights

QUESTIONS PRESENTED

1. Whether ILH was entitled to judgment on the pleadings on Ward's procedural due process claims because Ward could not possess a constitutionally protected property interest in participation in interscholastic athletics.
2. Whether the asserted property interest could be resolved on the pleadings without factual development concerning statutes, regulations, contracts, established practices, and modern developments in interscholastic athletics.

HOLDINGS

1. ILH was not entitled to judgment on the pleadings because the pleadings did not clearly establish that Ward lacked a constitutionally protected property interest in participating in interscholastic athletics.
2. The existence of a property interest in interscholastic athletics could not be resolved as a matter of law at the pleading stage; discovery and further factual development were necessary.

KEY QUOTATIONS

“The court cannot rule out Ward’s argument as a matter of law and without any consideration of the evidence he might marshal at a later stage in this case.” (PageID.649)

“Whether state law and regulations, contracts, and established practice reflect that participation in interscholastic athletics is the kind of property interest protected by the Constitution is a material issue that the parties have not fully briefed, and that discovery will be needed to resolve.” (PageID.649)

FACTUAL BACKGROUND

ILH deemed Ward ineligible to participate in his senior year of high school water polo and denied his request for an eligibility exemption without explanation, notice, or an opportunity to be heard. Ward alleged that this conduct violated procedural due process and that HBA negligently misrepresented his eligibility to participate in high school sports. After the court denied emergency relief, Ward submitted a new exemption request for a winter or spring sport, which ILH denied without a hearing.

PROCEDURAL HISTORY

Ward filed suit in September 2025, alleging that ILH violated procedural due process by deeming him ineligible for his senior year of high school athletics and denying his exemption request without explanation, notice, or an opportunity to be heard. The court previously denied Ward's motion for a temporary restraining order because he had not made a strong showing that ILH's conduct constituted state action, and Ward withdrew his preliminary-injunction motion. After Ward submitted and was denied a later exemption request without a hearing, ILH moved for judgment on the pleadings; the court concluded that the property-interest issue required factual development and discovery.

DISPOSITION

other

CASES CITED

- Ward v. Interscholastic League of Honolulu, Civ. No. 25-00415, 2025 WL 2855146, at *10 (D. Haw. Oct. 8, 2025)
- Machado v. Int'l Ass'n of Heat & Frost Insulators & Asbestos Workers, 454 F. Supp. 2d 1056, 1061 (D. Haw. 2006)
- Kruse v. Hawai'i, 857 F. Supp. 741, 749 (D. Haw. 1994)
- Hal Roach Studios, Inc. v. Richard Feiner & Co., 896 F.2d 1542, 1550 (9th Cir. 1990)
- Fed. Home Loan Mortg. Corp. v. SFR Invs. Pool 1, LLC, 893 F.3d 1136, 1147 (9th Cir. 2018)
- Reed v. Goertz, 598 U.S. 230, 236 (2023)
- Bd. of Regents v. Roth, 408 U.S. 564, 577 (1972)
- Armstrong v. Reynolds, 22 F.4th 1058, 1067 (9th Cir. 2022)
- Brescia v. N. Shore Ohana, 115 Haw. 477, 500-01, 168 P.3d 929, 952-53 (Haw. 2007)
- Flint v. Cnty. of Kaua'i, 521 F. Supp. 3d 978, 993 n.8 (D. Haw. 2021)
- Vandever v. Lloyd, 644 F.3d 957, 966 (9th Cir. 2011)
- J.K. ex rel. Kaplan v. Minneapolis Pub. Schs., 849 F. Supp. 2d 865, 875 (D. Minn. 2011)
- Rutledge v. Ariz. Bd. of Regents, 660 F.2d 1345 (9th Cir. 1981)
- Haygood v. Younger, 769 F.2d 1350 (9th Cir. 1985) (en banc)
- Makanui v. Dep't of Educ., 6 Haw. App. 397, 721 P.2d 165 (Haw. Ct. App. 1986)
- James P. v. Lemahieu, 84 F. Supp. 2d 1113 (D. Haw. 2000)
- Miller v. Fairchild Indus., Inc., 797 F.2d 727, 735 (9th Cir. 1986)
- T-Mobile USA Inc. v. Selective Ins. Co. of Am., 908 F.3d 581, 586 (9th Cir. 2018)
- National Collegiate Athletic Association v. Alston, 594 U.S. 69 (2021)
- Shannon v. Bd. of Trs. of the Univ. of Ill., 2024 WL 218103, at *9-11 (C.D. Ill. Jan. 19, 2024)
- Goss v. Lopez, 419 U.S. 565 (1975)
- Nw. Airlines, Inc. v. Minn., 322 U.S. 292, 300 (1944)
- TikTok Inc. v. Garland, 604 U.S. 56, 62 (2025) (per curiam)
- Whitaker v. Bd. of Higher Educ., 461 F. Supp. 99, 105 (E.D.N.Y. 1978)
- Cardio-Med. Assocs., Ltd. v. Crozer-Chester Med. Ctr., 536 F. Supp. 1065, 1086 & n.24 (E.D. Pa. 1982)