

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ALASKA

Catharina Laan v. Debbe Lancaster, in her individual and official capacity as Yukon Flats School District Superintendent, et al.;
Michelle McGovern v. Debbe Lancaster, in her individual and official capacity as Yukon Flats School District Superintendent, et al.

Laan · No. 4:22-cv-00072-SLG; 4:22-cv-00073-SLG · Decided February 18, 2026

SUMMARY

The United States District Court for the District of Alaska denied defendants’ motions for attorney fees under 42 U.S.C. § 1988 against Catharina Laan and Michelle McGovern. Although summary judgment had been entered for defendants in the consolidated cases involving plaintiffs’ termination for refusing vaccination, the court found that their civil rights claims were not frivolous, unreasonable, or groundless, while directing that defendants receive taxable costs.

CASE DETAILS

COURT	United States District Court for the District of Alaska
WRITING FOR THE COURT	Sharon L. Gleason
JURISDICTION	United States District Court for the District of Alaska
DECIDED	February 18, 2026
DOCKET	4:22-cv-00072-SLG; 4:22-cv-00073-SLG
DISPOSITION	other
PROCEDURAL POSTURE	Defendants moved for attorney fees against each plaintiff after obtaining summary judgment on the plaintiffs' civil-rights claims. Defendants also sought costs through bills of costs.
PRECEDENTIAL VALUE	Unknown

TOPICS

attorney fees

costs

section 1983

civil rights

summary judgment

PRACTICE AREAS

civil rights

civil procedure

attorney fees

costs

QUESTIONS PRESENTED

1. Whether prevailing defendants were entitled to attorney fees under 42 U.S.C. § 1988 after obtaining summary judgment on the plaintiffs' § 1983 claims.
2. Whether Defendants were entitled to costs as prevailing parties when Plaintiffs did not overcome the presumption favoring taxation of costs.

HOLDINGS

1. Prevailing defendants may recover attorney fees in a § 1983 action only when the plaintiff's civil-rights claim was frivolous, unreasonable, or groundless, or when the plaintiff continued litigating after the claim clearly became so. Because Plaintiffs' claims were not frivolous, unreasonable, or groundless, Defendants were not entitled to attorney fees.
2. Defendants were entitled to costs identified in their bills of costs because Plaintiffs did not overcome the presumption that costs should be taxed in favor of the prevailing party.

KEY QUOTATIONS

“A civil rights claim under § 1983 is not “frivolous” merely because the “plaintiff did not ultimately prevail.””

FACTUAL BACKGROUND

Catharina Laan and Michelle McGovern were terminated from their positions with the Yukon Flats School District after refusing to be vaccinated. They brought civil-rights claims under 42 U.S.C. § 1983. Although the court previously granted summary judgment to Defendants, it concluded that the claims were not frivolous, unreasonable, or groundless.

PROCEDURAL HISTORY

The two related actions were consolidated for purposes of the order. The court had previously granted summary judgment to Defendants in both cases. Plaintiffs did not respond to the motions for attorney fees. The court denied attorney fees but directed the Clerk to amend each judgment to award Defendants costs under the applicable bill of costs.

DISPOSITION

other

CASES CITED

- Thomas v. City of Tacoma, 410 F.3d 644, 647 (9th Cir. 2005)
- Christiansburg Garment Co. v. EEOC, 434 U.S. 412, 422 (1978)
- EEOC v. Bruno's Rest., 13 F.3d 285, 287 (9th Cir. 1993)
- Save Our Valley v. Sound Transit, 335 F.3d 932, 945 (9th Cir. 2003)

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