

COMMONWEALTH COURT OF PENNSYLVANIA

Hoffman v. Steel Valley School District

107 A.3d 288 (Pa. Commw. Ct. 2015) · Decided January 12, 2015

SUMMARY

The Pennsylvania Commonwealth Court affirmed the denial of Laura Hoffman's motion for a preliminary injunction requiring Steel Valley School District to provide private bus or van transportation for her children attending a charter school. The court held that the trial court had reasonable grounds to conclude that Hoffman had not established a clear right to the requested relief, because the Charter School Law and Public School Code provisions should be construed together and did not compel private transportation by bus or van. The court did not decide whether mileage reimbursement independently satisfied the School District's statutory transportation obligation.

CASE DETAILS

COURT	Commonwealth Court of Pennsylvania
WRITING FOR THE COURT	McCullough; Colins; Leadbetter
JURISDICTION	Pennsylvania
DECIDED	January 12, 2015
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from an order of the Court of Common Pleas of Allegheny County denying a motion for a preliminary injunction in an equity action seeking transportation services and declaratory relief under Pennsylvania school-transportation statutes.
STANDARD OF REVIEW	An order granting or denying a preliminary injunction is reviewed for abuse of discretion. The appellate court examines the record only to determine whether apparently reasonable grounds support the trial court's action and does not decide the merits of the controversy.
PRECEDENTIAL VALUE	published and precedential
PARTIES	Laura Hoffman v. Steel Valley School District

TOPICS

- injunctions
- statutory interpretation
- equitable relief
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the trial court abused its discretion by denying Hoffman's motion for a preliminary injunction requiring the School District to provide private bus or van transportation to the charter school.
2. Whether sections 1726-A of the Charter School Law and 1362 of the Public School Code must be construed in *pari materia* in determining the School District's transportation obligations.
3. Whether the court needed to decide, at the preliminary-injunction stage, whether mileage reimbursement satisfied the School District's statutory obligation.

HOLDINGS

1. The trial court had apparently reasonable grounds to deny the preliminary injunction because Hoffman failed to establish a clear right to the specific relief sought—private bus or van transportation for her children.
2. The two provisions address the same subject—free transportation of pupils—and therefore are in *pari materia* and must be construed together.
3. The court did not need to decide whether mileage reimbursement satisfied the School District's statutory transportation obligation because that issue was separate from whether Hoffman had a clear right to an injunction compelling private bus or van transportation.

KEY QUOTATIONS

“An injunction that commands the performance of an affirmative act, a ‘mandatory injunction,’ is the rarest form of injunctive relief and is often described as an extreme remedy.” (107 A.3d at 290)

*“As both of the statutory provisions address the subject of student transportation, they are in *pari materia* and are to be construed accordingly.” (107 A.3d at 295)*

FACTUAL BACKGROUND

Hoffman enrolled her two children in Young Scholars Charter School, located within ten miles of the Steel Valley School District. The District initially provided private van transportation but later stopped doing so because of budget constraints and offered public transportation or mileage reimbursement instead. Hoffman accepted mileage reimbursement for several months but later sought an order requiring the District to resume private bus or van transportation, asserting that public transportation was unsafe and inappropriate for her young children.

PROCEDURAL HISTORY

Hoffman filed a complaint in equity seeking a preliminary and permanent injunction requiring Steel Valley School District to provide private transportation for her children to a charter school, as well as a declaration concerning reimbursement of transportation costs. After a hearing, the trial court denied the preliminary

injunction, concluding that Hoffman had not shown a clear right to relief because the School Code permitted several methods of satisfying the free-transportation requirement. The Commonwealth Court affirmed.

DISPOSITION

affirmed

CASES CITED

- Reed v. Harrisburg City Council, 927 A.2d 698, 702 (Pa. Commw. Ct. 2007)
- Summit Township v. Fennell, 392 Pa. 313, 140 A.2d 789 (1958)
- Wyland v. West Shore School District, 52 A.3d 572, 582 (Pa. Commw. Ct. 2012)
- Summit Towne Centre, Inc. v. Shoe Show of Rocky Mount, Inc., 573 Pa. 637, 828 A.2d 995, 1001 (2003)
- County of Allegheny v. Commonwealth, 518 Pa. 556, 544 A.2d 1305, 1307 (1988)
- Watts v. Manheim Township School District, 84 A.3d 878 (Pa. Commw. Ct. 2014), appeal granted, 99 A.3d 532 (Pa. 2014)