

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
PENNSYLVANIA

Anna C., individually and on behalf of K.C. v. Colonial School
District

No. 2:24-cv-06313, United States District Court for the Eastern District of Pennsylvania (February 5, 2026)

SUMMARY

The United States District Court for the Eastern District of Pennsylvania considers Plaintiff’s motion for attorneys’ fees and costs under the Individuals with Disabilities Education Act following a settlement concerning private-school tuition reimbursement. The Court analyzes the reasonableness of requested hourly rates and attorney time under the lodestar method, including objections to specific billing entries. The opinion awards the requested rates with a reduction for one attorney and makes various reductions to the hours claimed.

CASE DETAILS

COURT	United States District Court for the Eastern District of Pennsylvania
WRITING FOR THE COURT	Catherine Henry
JURISDICTION	United States District Court for the Eastern District of Pennsylvania
DECIDED	February 5, 2026
DOCKET	2:24-cv-06313
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved for attorneys' fees and costs under the Individuals with Disabilities Education Act and Section 504 after settling her appeal from an administrative decision denying tuition reimbursement for one school year.
STANDARD OF REVIEW	The court exercised discretion under 20 U.S.C. § 1415(i)(3)(B)(i)(I) to determine the reasonableness of attorneys' fees and costs, reviewing requested hourly rates and hours under the lodestar methodology.
PRECEDENTIAL VALUE	unknown

TOPICS

- remedies
- civil rights
- ada / disability

PRACTICE AREAS

education law

disability rights

attorneys' fees

civil rights

QUESTIONS PRESENTED

1. Whether Plaintiff was entitled to recover reasonable attorneys' fees and costs as a prevailing parent under the IDEA and Section 504.
2. What hourly rates were reasonable for Plaintiff's four attorneys under prevailing Philadelphia market rates.
3. Whether the hours billed and expert and litigation costs were reasonably expended and recoverable.
4. What total fee and cost award should be entered.

HOLDINGS

1. Plaintiff was entitled to an award of reasonable attorneys' fees and costs because she succeeded in the underlying FAPE litigation and the settlement resolved the tuition-reimbursement claim while leaving the fee claim for adjudication.
2. The lodestar, calculated by multiplying reasonable hours by a reasonable hourly rate, is the appropriate starting point and is strongly presumed reasonable; departure is warranted only in rare circumstances.
3. Plaintiff could recover reasonable expert fees under Section 504 because the hearing officer addressed the Section 504 and IDEA claims coextensively.
4. The court awarded \$479,967.50 in attorneys' fees and \$19,860.95 in expert fees and court costs, for a total award of \$499,828.50.

KEY QUOTATIONS

"In determining whether an award is reasonable, a court first calculates the lodestar by multiplying the reasonable hours worked by a reasonable hourly rate." (II.A)

"The lodestar is strongly presumed to be reasonable." (II.A)

"In addition to attorneys' fees of \$479,967.50, I will award expert fees and court costs of \$19,860.95, for a total award of \$499,828.50." (III)

FACTUAL BACKGROUND

K.C., who spent the first eight years of her life in an Indian orphanage without formal education, was later diagnosed with multiple language-based learning disabilities, including triple-deficit dyslexia and a speech and language impairment. After moving into the Colonial School District, Plaintiff contended that the District failed to timely offer an individualized education program reasonably calculated to provide a free appropriate public education, so she enrolled K.C. at AIM Academy. The administrative hearing officer awarded tuition reimbursement for 2023-2024 but denied reimbursement for 2024-2025; the parties subsequently settled the tuition claims, leaving the fee dispute for decision.

PROCEDURAL HISTORY

Plaintiff filed an IDEA due process complaint seeking reimbursement for her daughter's private-school tuition. The Pennsylvania special-education hearing officer awarded reimbursement for the 2023-2024 school year but denied reimbursement for 2024-2025. Plaintiff appealed the denial to the district court, and the parties later settled the tuition-reimbursement claims, leaving only Plaintiff's claim for attorneys' fees and costs. The district court granted the fee motion in substantial part and awarded \$499,828.50.

DISPOSITION

other

CASES CITED

- Augustyn v. Wall Twp. Bd. of Educ., 139 F.4th 252, 259, 262 (3d Cir. 2025)
- Souryavong v. Lackawanna Cnty., 872 F.3d 122, 128 (3d Cir. 2017)
- Perdue v. Kenny A. ex rel. Winn, 559 U.S. 542, 544 (2010)
- Maldonado v. Houstoun, 256 F.3d 181, 184, 187 (3d Cir. 2001)
- Pub. Int. Rsch. Grp. of New Jersey, Inc. v. Windall, 51 F.3d 1179, 1185 (3d Cir. 1995)
- Lanni v. New Jersey, 259 F.3d 146, 149 (3d Cir. 2001)
- Pocono Mountain Sch. Dist. v. T. D., No. 22-cv-1787, 2023 WL 2983501, at *4 (3d Cir. Apr. 18, 2023)
- Ida D. v. Rivera, No. 17-cv-5272, 2019 WL 2615481, at *7 (E.D. Pa. June 26, 2019)
- Sch. Dist. of Philadelphia v. Kirsch, No. 14-cv-4910, 2017 WL 131808, at *3 (E.D. Pa. Jan. 11, 2017), aff'd, 722 F. App'x 215 (3d Cir. 2018)
- Rayna P. v. Campus Cmty. Sch., 390 F. Supp. 3d 556, 565 (D. Del. 2019)
- Monec Holding AG v. Motorola Mobility, Inc., No. 11-cv-798, 2014 WL 4402825, at *1-2 (D. Del. Sept. 5, 2014)
- Marisol A. ex rel. Forbes v. Giuliani, 111 F. Supp. 2d 381, 392 (S.D.N.Y. 2000)
- Simring v. Rutgers, 634 F. App'x 853, 861 (3d Cir. 2015)
- K.S. v. Upper Darby Sch. Dist., No. 20-cv-4470, 2021 WL 4262324, at *7 (E.D. Pa. Sept. 20, 2021)
- E.H. v. Wissahickon Sch. Dist., No. 19-cv-5445, 2020 WL 6286709, at *5 (E.D. Pa. Oct. 27, 2020)
- Central Bucks Sch. Dist. v. Q.M., No. 22-cv-1128, 2022 WL 17339037, at *17 (E.D. Pa. Nov. 29, 2022)
- McKenna v. City of Philadelphia, 582 F.3d 447, 459 (3d Cir. 2009)