

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
MISSISSIPPI, NORTHERN DIVISION

Olivia Boone, as Next Friend of K.A., a Minor v. Rankin County
Public School District

Boone · No. 3:22-CV-46-KHJ-MTP · Decided December 22, 2025

SUMMARY

The United States District Court for the Southern District of Mississippi considers Olivia Boone’s motion for attorneys’ fees arising from litigation under the Individuals with Disabilities Education Act. The court reduces the requested fees based on clerical, duplicative, excessive, and inadequately documented time entries, applies a billing-judgment reduction, and awards \$159,727.05 in fees plus \$4,927.84 in costs and expenses. The total award is \$164,654.89.

CASE DETAILS

COURT	United States District Court for the Southern District of Mississippi, Northern Division
JURISDICTION	United States District Court for the Southern District of Mississippi, Northern Division
DECIDED	December 22, 2025
DOCKET	3:22-CV-46-KHJ-MTP
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved for attorneys' fees and costs under the Individuals with Disabilities Education Act after prevailing in an administrative proceeding and obtaining favorable relief in the district court. The court granted the motion in part and denied it in part.
STANDARD OF REVIEW	The court evaluated the reasonableness of the requested attorneys' fees under the lodestar methodology and exercised discretion in applying reductions and adjustments.
PRECEDENTIAL VALUE	unpublished district-court order; persuasive authority only
PARTIES	Olivia Boone, as Next Friend of K.A., a Minor v. Rankin County Public School District

TOPICS

attorney fees

remedies

civil procedure

PRACTICE AREAS

education law

disability rights

attorneys' fees

civil procedure

QUESTIONS PRESENTED

1. What amount of attorneys' fees and costs was reasonable under the IDEA after Boone established prevailing-party status?
2. Which billed hours were noncompensable because they involved clerical work, duplication, excessive time, inadequate documentation, or lack of billing judgment?
3. What hourly rates were reasonable for the attorneys, paralegals, and legal assistant involved?
4. Whether the lodestar should be further reduced because of limited success, alleged protraction of the litigation, or the undesirability of the case.

HOLDINGS

1. The court reduced the requested hours for clerical work, duplicative travel, excessive and duplicative work on the complaint, and inadequately documented entries, while allowing the remaining supported hours.
2. The reasonable hourly rates were \$280 for Julian Miller, \$250 for Eugene Choi, and \$125 for each paralegal and legal assistant.
3. The court reduced the lodestar by 10% because Boone's attorneys did not adequately document the exercise of billing judgment.
4. No further reduction was warranted because Boone's degree of success was not undermined by K.A.'s non-enrollment, the settlement history did not establish unreasonable protraction, and the lodestar already adequately limited compensation for unproductive litigation.
5. Boone was awarded \$159,727.05 in attorneys' fees plus \$4,927.84 in uncontested costs and expenses, for a total award of \$164,654.89.

KEY QUOTATIONS

“Courts in the Fifth Circuit use a two-step process to determine the reasonableness of an award of attorneys' fees.” (III.A)

“Even if the court determines that a party is a prevailing party under the IDEA, this does not automatically entitle him to recover the full amount that he spent on legal representation.” (III.A.1)

“Parties submitting fee requests are required to exercise billing judgment, which refers to the usual practice of law firms in writing off unproductive, excessive, or redundant hours.” (III.A.3.a)

“The final award therefore equals \$164,654.89.” (IV)

FACTUAL BACKGROUND

The Rankin County Public School District attempted to transfer K.A., a child with autism, to another school over Boone's objection. Boone challenged the unilateral transfer through the Mississippi Department of Education's special-education process and obtained an order in her favor, including non-contingent autism-based services. After the district court and Fifth Circuit proceedings, Boone sought recovery of attorneys' fees, costs, and expenses.

PROCEDURAL HISTORY

The school district attempted to transfer K.A. to another school. An impartial hearing officer ruled for Boone but denied compensatory educational services and requested briefing on attorneys' fees. Boone appealed the denial of compensatory services and sought fees in federal court; the district court denied compensatory services, found Boone to be a prevailing party entitled to fees, and the Fifth Circuit affirmed. The district court then resolved Boone's motion seeking \$261,470.74 in fees and costs by awarding \$164,654.89.

DISPOSITION

other

CASES CITED

- 140 F.4th 697 (5th Cir. 2025)
- 461 U.S. 424 (1983)
- 420 F. App'x 338, 343 (5th Cir. 2011)
- 829 F.3d 388, 391 (5th Cir. 2016)
- 394 F. App'x 38 (5th Cir. 2010)
- 50 F.3d 319, 325-26 (5th Cir. 1995)
- 649 F.3d 374, 380 (5th Cir. 2011)
- 285 F.3d 357, 368 (5th Cir. 2002)
- 448 F.3d 795, 799 (5th Cir. 2006)
- 215 F. App'x 341, 341 (5th Cir. 2007) (per curiam)
- 505 U.S. 557, 567 (1992)
- 488 F.2d 714, 717-19 (5th Cir. 1974)

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