

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Shackleford v. District of Columbia

Shackleford · No. 26-cv-00792 (APM) · Decided April 22, 2026

SUMMARY

The United States District Court for the District of Columbia grants in part and denies in part the District of Columbia’s motion to sever and dismiss improperly joined plaintiffs in an Individuals with Disabilities Education Act attorneys’ fees action. The court holds that claims arising from seven separate administrative proceedings are not logically related under Federal Rule of Civil Procedure 20 and orders the claims of all plaintiffs except Ikeashia Shackleford severed. The severed claims will be dismissed unless refiled as separate cases within 60 days, while the District must answer Shackleford’s claim by May 6, 2026.

CASE DETAILS

COURT	United States District Court for the District of Columbia
WRITING FOR THE COURT	Amit P. Mehta
JURISDICTION	United States District Court for the District of Columbia
DECIDED	April 22, 2026
DOCKET	26-cv-00792 (APM)
DISPOSITION	other
PROCEDURAL POSTURE	Defendant moved under Federal Rules of Civil Procedure 20 and 21 to sever and dismiss allegedly improperly joined plaintiffs and to stay the deadline for answering. The court granted severance, declined to dismiss the severed claims immediately, and denied the request to stay the answer deadline as moot.
STANDARD OF REVIEW	The court applied the requirements for permissive joinder under Federal Rule of Civil Procedure 20(a), including whether the claims arose from the same transaction, occurrence, or series of transactions or occurrences and whether a common question of law or fact would arise. It also applied Rule 21’s authorization to sever parties based on misjoinder.
PRECEDENTIAL VALUE	Published district court order

TOPICS

joinder

attorney fees

costs

civil procedure

PRACTICE AREAS

civil procedure

education law

attorney fees and costs

QUESTIONS PRESENTED

1. Whether the plaintiffs' separate IDEA attorneys' fees and costs claims arose from the same transaction, occurrence, or series of transactions or occurrences so as to permit joinder under Federal Rule of Civil Procedure 20(a).
2. Whether the improperly joined claims should be severed under Federal Rule of Civil Procedure 21.
3. Whether the severed claims should be dismissed immediately or instead permitted to be refiled as separate actions.
4. Whether the deadline for the defendant to answer should be stayed.

HOLDINGS

1. Claims for IDEA attorneys' fees arising from separate administrative proceedings are not properly joined merely because they arise under the same statute; the claims must be logically related and satisfy Rule 20(a)'s same-transaction-or-occurrence requirement.
2. The claims of all plaintiffs except the first-listed plaintiff must be severed because the claims are improperly joined under Rule 20(a).
3. The severed claims were not dismissed immediately, but each severed plaintiff's claim would be dismissed unless refiled as a separate, unrelated case within 60 days.
4. The defendant's request to stay the deadline to answer was denied as moot; the defendant was required to answer the complaint as to Shackleford's fees petition by May 6, 2026.

KEY QUOTATIONS

"To satisfy the 'same transaction or occurrence' prong of Rule 20(a), the claims sought to be joined must be 'logically related' to one another." (at 1)

"The flexibility inherent in the logical relationship test does not give the court license to disregard the 'common transaction or occurrence' requirement of Rule 20(a)." (at 2)

FACTUAL BACKGROUND

Fourteen plaintiffs asserted a single claim for IDEA attorneys' fees and costs based on seven separate administrative proceedings. The claims did not arise from a common policy or other identified relationship beyond arising under the IDEA. Although all plaintiffs were represented by the same lawyer, the court found that fact insufficient to establish a logical relationship among the fees claims.

PROCEDURAL HISTORY

Fourteen plaintiffs filed a single action seeking attorneys’ fees and costs under the Individuals with Disabilities Education Act arising from seven separate administrative proceedings. The District of Columbia moved to sever and dismiss the claims of all plaintiffs except the first-listed plaintiff, Ikeashia Shackelford. The court granted the motion to sever, allowed the severed plaintiffs 60 days to refile their claims as separate actions, and ordered an answer to the remaining claim.

DISPOSITION

other

CASES CITED

- Davidson v. District of Columbia, 736 F. Supp. 2d 115, 117–22 (D.D.C. 2010)
- Parks v. District of Columbia, 275 F.R.D. 17, 19 (D.D.C. 2011)
- Thompson v. District of Columbia, No. 12-cv-103 (RC-AK), 2013 WL 12106870 (D.D.C. July 1, 2013), report and recommendation adopted as modified, 2013 WL 12108061 (D.D.C. July 24, 2013)
- Salmeron v. District of Columbia, 77 F. Supp. 3d 201 (D.D.C. 2015)
- Abraham v. District of Columbia, 338 F. Supp. 2d 113, 122 (D.D.C. 2004)
- Armstrong v. Vance, 328 F. Supp. 2d 50, 55–56 (D.D.C. 2004)

OPINION

Shackelford v. District of Columbia

PER CURIAM.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____) IKEASHIA SHACKLEFORD et al.,))
Plaintiffs,)) v.) Case No. 26-cv-00792 (APM))
DISTRICT OF COLUMBIA,)
) Defendant.) _____)

ORDER

Having considered the parties’ positions, Defendant District of Columbia’s Motion to Sever and Dismiss Improperly Joined Plaintiffs and Stay Answer Deadline, ECF No. 3 [hereinafter Def’s Mot.], is granted in part and denied in part. Joinder of plaintiffs in a single action is proper under Federal Rule of Civil Procedure 20(a) if (1) the claims “aris[e] out of the same transaction, occurrence, or series of transactions or occurrences” and (2) “any question of law or fact common to all plaintiffs will arise in the action.” Fed. R. Civ. P. 20(a). “To satisfy the ‘same transaction or occurrence’ prong of Rule 20(a), the claims sought to be joined must be ‘logically related’ to one another.” Davidson v. District of Columbia, 736 F. Supp. 2d 115, 119 (D.D.C. 2010). Here, 14 Plaintiffs bring a single claim for attorneys’ fees and costs under the Individuals with Disabilities Education Act (IDEA) arising from seven separate administrative proceedings. See Compl., ECF

No. 1, ¶¶ 23–50. As in Davidson, “[b]eyond the fact that the claims all arise under the IDEA, the plaintiffs have offered nothing to suggest that the claims are logically related in any way.” Davidson, 736 F. Supp. 2d at 121. Accordingly, the claims for fees by all Plaintiffs but the first listed, Ikeashia Shackelford, must be severed. See Fed. R. Civ. P. 21 (allowing for severance based on misjoinder of parties). Plaintiffs rely on a single case, Parks v. District of Columbia, 275 F.R.D. 17 (D.D.C. 2011), for the proposition that the joinder of multiple fees petitions involving multiple administrative proceedings is proper under Rule 20. Pls.’ Mem. of P. & A. in Opp’n to Def.’s Mot., ECF No. 4 [hereinafter Pls.’ Opp’n], at 3.1 But Parks is easily distinguished, as the court there found that the District of Columbia’s application of a “common policy” of capping IDEA fees at \$4,000 provided “a sufficient basis for concluding that there is a logical relationship between the plaintiffs’ fees requests, such that they satisfy the first prong of Rule 20(a).” Parks, 275 F.R.D. at 19. This case involves no such common policy. Plaintiffs’ attempt to distinguish Davidson also is unconvincing. The plaintiffs in that case were the parents of 85 disabled students who prevailed in 158 separate IDEA administrative proceedings. Davidson, 736 F. Supp. 2d at 117. The court severed the claims of all but the first- listed plaintiff. See id. at 122. Plaintiffs seek to distinguish Davidson on the ground that it involved plaintiffs “who were represented by the same law firm, but not the same attorneys,” whereas this case involves a single lawyer who represents all Plaintiffs. Pls.’ Opp’n at 4. But even if that were an accurate factual distinction,² it is beside the point. The court in Davidson severed the plaintiffs’ various fees claims because there was no logical relationship among them and thus failed to satisfy 1 The other cases Plaintiffs cite are inapposite because they either did not raise the question of improper joinder, see Pls.’ Opp’n at 3 (citing Thompson v. District of Columbia, No. 12-cv-103 (RC-AK), 2013 WL 12106870 (D.D.C. July 1, 2013), report and recommendation adopted as modified, 2013 WL 12108061 (D.D.C. July 24, 2013), and Salmeron v. District of Columbia, 77 F. Supp. 3d 201 (D.D.C. 2015)), or endorsed only in dicta combining multiple fees petitions in a single case, id. at 2 (citing Abraham v. District of Columbia, 338 F. Supp. 2d 113, 122 (D.D.C. 2004), and Armstrong v. Vance, 328 F. Supp. 2d 50, 55–56 (D.D.C. 2004)). The court is not persuaded by the dicta in those cases. 2 It is not clear that Davidson involved multiple attorneys from the same firm. The opinion states that “each of the plaintiffs had been represented by the law firm Tyrka and Associates LLC, headed by attorney Douglas Tyrka.” 736 F. Supp. 2d at 118. No other attorneys from Tyrka and Associates are referenced. 2 the first prong of Rule 20(a), not because the case involved more than one lawyer. See Davidson, 736 F. Supp. 2d at 121 (“The flexibility inherent in the logical relationship test does not give the court license to disregard the ‘common transaction or occurrence’ requirement of Rule 20(a).”). The same is true here. Accordingly, the court grants Defendant’s motion to sever but declines to dismiss the severed claims at this time. Any severed Plaintiff’s claim will be dismissed, however, unless it is refiled as a separate, unrelated case within 60 days. See id. at 121–22. Defendant shall submit a Status Report no later than June 26, 2026, which advises whether the severed Plaintiffs have refiled their claims. Defendant shall answer the instant complaint insofar as

it relates to Ms. Shackleford's fees petition by May 6, 2026. Defendant's request to stay the deadline to answer is denied as moot. Dated: April 22, 2026 Amit P. Mehta United States District Judge 3

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