

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)