

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
FLORIDA, ORLANDO DIVISION

Yesenia Corcho v. Bank of America, N.A.

Corcho · No. 6:25-cv-1082-JSS-DCI · Decided January 5, 2026

SUMMARY

The court grants in part a pro se plaintiff's motion concerning electronic filing and notification in the case. Although the court denies authorization to file documents through CM/ECF without prejudice, it authorizes electronic filing notifications and directs the Clerk to add the plaintiff's email address to CM/ECF.

CASE DETAILS

COURT	United States District Court for the Middle District of Florida, Orlando Division
JURISDICTION	United States District Court for the Middle District of Florida, Orlando Division
DECIDED	January 5, 2026
DOCKET	6:25-cv-1082-JSS-DCI
DISPOSITION	other
PROCEDURAL POSTURE	Pro se plaintiff moved for permission to file and receive documents electronically through the CM/ECF system for the duration of the case.
STANDARD OF REVIEW	The court exercised discretion in determining whether a pro se litigant demonstrated good cause or extenuating circumstances warranting CM/ECF filing access and whether to authorize electronic notification.
PRECEDENTIAL VALUE	Unpublished district court order; persuasive rather than binding outside the case.
PARTIES	Yesenia Corcho v. Bank of America, N.A.

TOPICS

[civil procedure](#) [service of process](#)

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether a pro se litigant who has not demonstrated good cause or extenuating circumstances should be authorized to file documents through CM/ECF.
2. Whether the court may authorize a pro se litigant to receive electronic notifications of filings even while denying access to file through CM/ECF.
3. Whether Corcho should be granted access to PACER or otherwise permitted to view electronically maintained court records.

HOLDINGS

1. A pro se litigant is not entitled to CM/ECF filing access absent a showing of good cause or extenuating circumstances justifying an exception to the court's electronic-filing procedures. Corcho did not make that showing, so her request for CM/ECF filing access was denied without prejudice.
2. The court may, in its discretion, authorize a pro se litigant to receive electronic notifications of filings even without granting permission to file through CM/ECF. Corcho's request for email notification was granted.
3. The court did not need to grant special authorization for PACER access because any member of the public may register for PACER and access federal court records subject to applicable fees.

KEY QUOTATIONS

“pro se litigants are generally denied access to electronic filing unless extenuating circumstances exist to justify waiving CM/ECF procedures.”

“Thus, Corcho’s request to receive email notification via CM/ECF is well-taken and will be granted.”

FACTUAL BACKGROUND

The Middle District of Florida discontinued its web portal for pro se electronic filing on August 1, 2025. Corcho asserted that filing by mail or in person caused delays and hindered her timely participation in the litigation. The court noted that she had already made several filings and participated in the case without CM/ECF access, and found no showing that paper filing would be unduly burdensome or prejudicial.

PROCEDURAL HISTORY

Yesenia Corcho, proceeding without counsel, filed a motion requesting access to electronic filing and receipt of electronic documents. The district court denied access to file through CM/ECF because Corcho had not shown good cause or extenuating circumstances, but granted permission to receive electronic notifications of filings and directed the clerk to add her email address to CM/ECF.

DISPOSITION

CASES CITED

- Gillespie v. Wilcox, 2025 U.S. Dist. LEXIS, at *2 (M.D. Fla. Aug. 11, 2025)
- Huminski v. Vermont, 2014 WL 169848, at *4 (M.D. Fla. Jan. 15, 2014)
- McMahon v. Cleveland Clinic Found. Police Dep't, 455 F. App'x 874, 878 (11th Cir. 2011) (per curiam)
- Gerow v. Blackwell, 2024 WL 4679030, at *1 (M.D. Fla. Nov. 5, 2024)
- Moore v. Adventist Health Sys. Sunbelt Healthcare Corp., 2023 WL 4947933 (M.D. Fla. Aug. 3, 2023)
- Rothschild v. Anywhere Advisors LLC, 2024 WL 2749245, at *1 (M.D. Fla. May 29, 2024)

OPINION

UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA ORLANDO DIVISION YESENIA CORCHO, Plaintiff, v. Case No: 6:25-cv-1082-JSS-DCI BANK OF AMERICA, N.A., Defendant. ORDER Plaintiff Yesenia Corcho (Corcho), proceeding pro se, filed the instant motion seeking “permission to file and receive documents electronically through the CM/ECF system for the duration of this case.” Doc.

49 at 1 (the Motion). As will be explained, the Motion is due to be GRANTED IN PART. In the Motion, Corcho represents that filing documents “by mail or in person... has caused delays in docketing and receipt of filings and has hindered timely participation in litigation events.” Doc. 49 at 1. Corcho asserts that, “Good cause exists here due to repeated delays associated with physical filing and the need for timely service and notice during active litigation.” Id. On August 1, 2025, the Middle District of Florida discontinued the web portal—an electronic filing platform for pro se litigants.¹ Now, “[a]bsent a court order, a pro se litigant is not 1 See United States District Court Middle District of Florida, Lawyer Web Portal, <https://apps.flmd.uscourts.gov/cmecf/filings.cfm> (last visited on Oct.

17, 2025) (“Litigants without lawyers are not permitted to submit filings through the court’s web portal. Instead, litigants without lawyers must submit filings in person, by U.S. Mail, or by other delivery service.”); see also Gillespie v. Wilcox, 2025 U.S. Dist. LEXIS, at *2 (M.D. Fla. Aug. 11, 2025) (“Previously, the Court operated a web portal that allowed pro se litigants to file documents electronically.

That service has now ended.”). permitted to file documents in CM/ECF.” United States District Court Middle District of Florida, Administrative Procedures for Electronic Filing, at B(4) (Nov. 18, 2025). And “[p]ro se litigants are generally denied access to electronic filing unless extenuating circumstances exist to justify waiving CM/ECF procedures.” See Huminski v. Vermont, 2014 WL 169848, at *4 (M.D.

Fla. Jan. 15, 2014); *McMahon v. Cleveland Clinic Found. Police Dep't*, 455 F. App'x 874, 878 (11th Cir. 2011) (per curiam) (affirming denial of CM/ECF access for pro se litigant because there was “no good cause under the circumstances of the case to authorize his access.”); see also *Gerow v. Blackwell*, 2024 WL 4679030, at *1 (M.D. Fla. Nov. 5, 2024) (“The Eleventh Circuit has routinely upheld this district’s practice of denying CM/ECF access to pro se litigants absent a showing of good cause.”) (citations omitted).

In this instance, Corcho has not shown extenuating circumstances or good cause to authorize her access to file via CM/ECF. Since the Court’s discontinuation of the pro se Web Portal on August 1, 2025, Corcho has made several filings on the docket and participated in this case without CM/ECF access. See e.g., Docs. 16, 17, 18, 21, 29, 30, 31, 38, 39, 45, 49, 51, 52, 55, 56.

Further, the Court is not convinced that the filing of future documents in person, by U.S. Mail, or by other delivery service will be unduly burdensome and prejudicial. All pro se parties filing in this district are subject to the limitations inherent in paper filing, and the Federal Rules of Civil Procedure account for such processing time by adding three days to the applicable deadlines.

See Fed. R. Civ. P. 6(d) (citing Rules 5(b)(2)(C) and 6(a)). Accordingly, The Court is not persuaded that CM/ECF filing access is necessary for Corcho to litigate this matter. That said, the Court in its discretion may grant a pro se party permission to receive electronic notification of filings.² *Moore v. Adventist Health Sys. Sunbelt Healthcare Corp.*, 2023 WL 4947933 (M.D.

Fla. Aug. 3, 2023) (authorizing electronic notification of filings for a pro se litigant). Parties that receive notice of electronic filing receive “an email confirmation of the filing that is sent to each E-filer of record in the case and to any other individual authorized by the Court to receive electronic notifications of case filings.” Admin. Proc. for Elec.

Filing, at D(1). Further, “[a] non-sealed document filed electronically can be viewed for the first time for free from the document link within the [notice]. The hyperlink expires after the earlier of two events: the first use or 15 days after the [notice] is emailed,” after which a party must access PACER—and pay the required fees—to view a document. *Id.* at D(2).

It is recommended that a party obtaining a document in this manner open the document and save it for future use, as the document may be accessed for free only during the first view. Thus, Corcho’s request to receive email notification via CM/ECF is well-taken and will be granted.

To the extent Corcho seeks access to the electronically maintained docket system known as “PACER,” “[a]ny member of the public can access electronic records of the federal courts by registering online with PACER[.]” *Rothschild v. Anywhere Advisors LLC*, 2024 WL 2749245, at *1 (M.D. Fla. May 29, 2024).

The Court's Guide for Proceeding Without a Lawyer provides: If you have internet access, you may also register for PACER (Public Access to Court Electronic Records) and view and print the documents in a case. To register, go to the PACER registration page on the PACER website (www.pacer.gov) or call (800) 676-6856. Using PACER may cost \$.10 a page for viewing or printing.

PACER will give you details when you register. Problems with PACER should be addressed to PACER, not to the court. 2 Corcho may also consent to receive electronic service from other parties in this case by filing a notice of consent to electronic service. See Fed. R. Civ. P. 5(b)(2) (E). United States District Court Middle District of Florida, Guide for Proceeding Without a Lawyer, p. 13 (Feb.

10, 2022) (available at <https://www.flmd.uscourts.gov/sites/flmd/files/documents/flmd-guide-for-proceeding-without-a-lawyer.pdf>). Accordingly, it is ORDERED that: 1. The Motion (Doc. 49) is GRANTED IN PART to the extent that Corcho seeks authorization to receive electronic notification of filing; 2. DENIED without prejudice in all other respects; and 3.

The Clerk is directed to add Corcho's email address, Cubaroseay27@gmail.com, to CM/ECF in this matter. ORDERED in Orlando, Florida on January 5, 2026. ene — UNITED STATES MAGISTRATE JUDGE Copies furnished to: Counsel of Record Unrepresented Parties