

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PRECEDENTIAL VALUE	Unpublished district court order; persuasive rather than binding outside the case.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

other

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)

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