

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
OHIO, EASTERN DIVISION

Tiffany Thomas v. Beachwood City School District Board of
Education

Thomas · No. 1:25-cv-2167 · Decided December 19, 2025

SUMMARY

A magistrate judge's report and recommendation addressing Tiffany Thomas's motion for a preliminary injunction in an action against the Beachwood City School District Board of Education. The report recommends denying injunctive relief, denies Thomas's request for an evidentiary hearing, and grants the defendant's motion to file supplemental opposition documents. The court concludes that Thomas did not demonstrate a sufficient likelihood of success on her IDEA, disability-discrimination, retaliation, or First Amendment claims, or imminent irreparable harm.

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio, Eastern Division
WRITING FOR THE COURT	James E. Grimes Jr.
JURISDICTION	United States District Court for the Northern District of Ohio, Eastern Division
DECIDED	December 19, 2025
DOCKET	1:25-cv-2167
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved for a preliminary injunction and an evidentiary hearing in an action asserting IDEA, Rehabilitation Act, ADA, and First Amendment claims. The magistrate judge issued a report and recommendation recommending denial of the preliminary injunction, denying the evidentiary-hearing motion, and granting the defendant's motion to file supplemental documents.
STANDARD OF REVIEW	A preliminary injunction is evaluated under four factors: likelihood of success on the merits, irreparable harm absent relief, harm to others, and the public interest. The factors are balanced rather than treated as prerequisites, but irreparable injury is mandatory. Whether a movant is likely to succeed on the merits is a question of law.

PRECEDENTIAL VALUE	nonprecedential
PARTIES	Tiffany Thomas v. Beachwood City School District Board of Education

TOPICS

injunctions civil procedure ada / disability first amendment due process

PRACTICE AREAS

civil procedure education law disability discrimination constitutional law injunctive relief

QUESTIONS PRESENTED

1. Whether Thomas was entitled to a preliminary injunction restoring direct communications with the child's teachers and service providers and prohibiting retaliation or interference with her statutory and constitutional rights.
2. Whether Thomas demonstrated a likelihood of success on her IDEA, Section 504, ADA, and First Amendment claims.
3. Whether Thomas demonstrated imminent and irreparable harm warranting preliminary injunctive relief.
4. Whether Thomas was entitled to an evidentiary hearing on the preliminary-injunction motion.
5. Whether the defendant should be permitted to file supplemental documents in opposition to the preliminary-injunction motion.

HOLDINGS

1. A party seeking a preliminary injunction must establish a strong or substantial likelihood of success on the merits, imminent and irreparable harm absent relief, that the requested relief will not cause substantial harm to others, and that relief serves the public interest; the factors are balanced, but irreparable injury is indispensable.
2. A plaintiff seeking relief for denial of a free appropriate public education must first exhaust IDEA administrative remedies, and filing or withdrawing administrative complaints does not establish completed exhaustion.
3. A non-attorney parent may not proceed pro se on behalf of a minor child's personal claims.
4. On the record presented, the school district's protocol directing communications through designated officials constituted a permissible reasonable, viewpoint-neutral time, place, and manner restriction rather than a demonstrated First Amendment violation.

KEY QUOTATIONS

“These factors are not prerequisites but are factors that are to be balanced against each other.” (Legal Standard)

“the existence of an irreparable injury is mandatory” (Discussion § 2)

“a school may impose reasonable, viewpoint neutral, time, place, and manner restrictions on parental interactions with the school” (Discussion § 1)

FACTUAL BACKGROUND

Thomas's child attends the Beachwood City School District and has an individualized education program. After Thomas engaged in extensive email and in-person communications that school staff allegedly viewed as violating district communication standards, the district adopted a communication protocol directing her communications about the child to the Superintendent, Principal, and Director of Pupil Services and blocking direct emails to teachers and staff. Thomas alleged that the protocol impaired parental participation, caused educational harm, and violated the IDEA, Section 504, the ADA, and the First Amendment. The record indicated that Thomas continued to have contact with district officials regarding IEP matters and that at least one missed meeting followed her decision not to participate.

PROCEDURAL HISTORY

Thomas filed the complaint and a motion for preliminary injunction in October 2025. The district court referred the matter to the magistrate judge for pretrial supervision and preparation of a report and recommendation on case-dispositive motions. The report recommends denial of the preliminary injunction and separately denies the request for an evidentiary hearing and grants the defendant's motion to file supplemental documents.

DISPOSITION

other

CASES CITED

- Honig v. Doe, 484 U.S. 305, 309, 311, 312-17, 325, 328 (1988)
- Northeast Ohio Coalition for Homeless and Service Employees Int'l Union, Local 1199 v. Blackwell, 467 F.3d 999, 1009 (6th Cir. 2006)
- Summit County Democratic Central and Executive Committee v. Blackwell, 388 F.3d 547, 550 (6th Cir. 2004)
- Jones v. Caruso, 569 F.3d 258, 265 (6th Cir. 2009)
- Overstreet v. Lexington-Fayette Urban County Government, 305 F.3d 566, 573 (6th Cir. 2002)
- Tumblebus Inc. v. Cranmer, 399 F.3d 754, 760 (6th Cir. 2005)
- Fry v. Napoleon Community Schools, 580 U.S. 154, 165-68 (2017)
- Bishop v. Oakstone Academy, 477 F. Supp. 2d 876, 883 (S.D. Ohio 2007)
- Sheperd v. Wellman, 313 F.3d 963, 970 (6th Cir. 2002)
- Cheung v. Youth Orchestra Foundation of Buffalo, Inc., 906 F.2d 59, 61 (2d Cir. 1990)
- Smith v. Michigan Department of Corrections, 159 F.4th 1067, 1074-82 (6th Cir. 2025)
- M.L. v. Williamson County Board of Education, 772 F. App'x 287, 291 (6th Cir. 2019)

- *Paige v. Coyner*, 614 F.3d 273, 277 (6th Cir. 2010)
- *L. F. v. Lake Washington School District #414*, 947 F.3d 621, 626 (9th Cir. 2020)
- *Boone v. Lowell Area Schools*, 2025 U.S. Dist. LEXIS 193862, *9 (W.D. Mich. Sept. 30, 2025)
- *Searle v. Red Creek Central School District*, No. 21-cv-6086, 2021 WL 5086405, at *4 (W.D.N.Y. Nov. 2, 2021)
- *McElhaney v. Williams*, 81 F.4th 550, 559 (6th Cir. 2023), cert. denied, 144 S. Ct. 696 (2024)
- *D.T. v. Sumner County School*, 942 F.3d 324, 327 (6th Cir. 2019)
- *Michigan Coalition of Radioactive Material Users, Inc. v. Griepentrog*, 945 F.2d 150, 154 (6th Cir. 1991)
- *Lewis v. Gotham Insurance Co.*, No. 09-cv-52, 2009 WL 3698028, at *1 (S.D. Cal. Nov. 5, 2009)
- *Springs Industries, Inc. v. American Motorists Insurance Co.*, 137 F.R.D. 238, 239-40 (N.D. Tex. 1991)
- *Island Creek Coal Co. v. Wilkerson*, 910 F.3d 254, 256 (6th Cir. 2018)
- *Berkshire v. Beauvais*, 928 F.3d 520, 530-31 (6th Cir. 2019)