

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA

**M.C., by and through his Parents, K.J-C and J.C., and K.J-C and
J.C., individually v. Williamsport Area School District**

M.C. v. Williamsport Area School District · No. 4:25-CV-01831 · Decided March 18, 2026

SUMMARY

The United States District Court for the Middle District of Pennsylvania considers Plaintiffs’ motion to supplement the administrative record in an Individuals with Disabilities Education Act action concerning the appropriateness of an educational placement. The court grants the motion in part, admitting two reports concerning the student’s progress at a new school, and denies it in part as to exhibits that were cumulative of materials already in the administrative record.

CASE DETAILS

COURT	United States District Court for the Middle District of Pennsylvania
WRITING FOR THE COURT	Matthew W. Brann
JURISDICTION	United States District Court for the Middle District of Pennsylvania
DECIDED	March 18, 2026
DOCKET	4:25-CV-01831
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiffs moved to supplement the administrative record in an IDEA action seeking review of a hearing officer's decision, tuition reimbursement, and related relief. The court considered whether the proposed exhibits constituted admissible additional evidence under the IDEA.
STANDARD OF REVIEW	The district court has discretion under the IDEA to receive additional evidence. It must exercise particularized discretion and consider whether the evidence is relevant, non-cumulative, useful, and supported by a sufficient justification for not presenting it during the administrative hearing. Evidence concerning events after the administrative hearing may be considered only insofar as it bears on the reasonableness of the school district's decision when made.
PRECEDENTIAL VALUE	unpublished district court memorandum opinion; persuasive value only

PARTIES

M.C., by and through his Parents, K.J-C and J.C., and K.J-C and J.C.,
individually v. Williamsport Area School District

TOPICS

judicial review of agency action

agency adjudication

administrative law

civil procedure

PRACTICE AREAS

administrative law

education law

disability rights

QUESTIONS PRESENTED

1. Whether the proposed exhibits should be admitted as additional evidence supplementing the IDEA administrative record.
2. Whether post-hearing progress reports concerning M.C.'s private-school placement could be considered without impermissibly evaluating the school district's decision with hindsight.

HOLDINGS

1. Exhibits that were already part of the administrative record, or that merely reproduced material contained in that record, were cumulative and would not be admitted as additional evidence.
2. The court may admit post-hearing progress reports when they may assist in determining whether the IDEA's goals have been reached, provided that the reports are used only to evaluate the reasonableness of the district's decision at the time it was made and not for impermissible hindsight review.

KEY QUOTATIONS

“Instead, a court “must exercise particularized discretion” to determine whether the proffered evidence is “relevant, non-cumulative, and useful.”” (Memorandum Opinion, Law)

“The standard in determining whether to admit the proffered additional evidence is asking the question of: “would the evidence assist the court in ascertaining whether Congress’ goal has been and is being reached for the child involved.”” (Memorandum Opinion, Law)

“But it has made clear that such evidence “may be considered only with respect to the reasonableness of the district's decision at the time it was made.”” (Memorandum Opinion, Analysis)

FACTUAL BACKGROUND

M.C.'s parents challenged a hearing officer's decision concerning M.C.'s educational placement and sought tuition reimbursement for his placement at a private school. The motion to supplement included multiple exhibits, most of which duplicated materials already contained in the administrative record. Exhibits H and I consisted of progress reports from the new school M.C. was attending, prepared immediately before or after the hearing officer's decision, and were not part of the administrative record.

PROCEDURAL HISTORY

Plaintiffs filed the action on September 30, 2025, challenging portions of a hearing officer's decision concerning M.C.'s free appropriate public education and seeking tuition reimbursement. The District filed a counterclaim challenging the portion of the hearing officer's decision awarding compensatory education. Plaintiffs then moved to supplement the administrative record. The court granted the motion as to Exhibits H and I and denied it as to the remaining exhibits.

DISPOSITION

other

CASES CITED

- A.H. by & through K.P. v. Colonial School District, No. CV 16-726-RGA-MPT, 2017 WL 1395508, at *2 (D. Del. Apr. 17, 2017), aff'd, 779 F. App'x 90 (3d Cir. 2019)
- Susan N. v. Wilson School District, 70 F.3d 751, 758-60, 762 (3d Cir. 1995)
- M.S. by & through Emily S. v. Downingtown Area School District, No. 20-CV-5085-JMY, 2022 WL 16531962, at *16 (E.D. Pa. Oct. 28, 2022)
- Antoine M. v. Chester Upland School District, 420 F. Supp. 2d 396, 402 (E.D. Pa. 2006)
- Breanne C. v. S. York County School District, No. 1:08-1526, 2010 WL 773945, at *1 (M.D. Pa. Feb. 26, 2010)
- J.C. v. Upper Darby School District, No. CV 20-5030, 2022 WL 4473598, at *1, *3 (E.D. Pa. Sept. 26, 2022)
- Lebron v. N. Penn School District, 769 F. Supp. 2d 788, 796 (E.D. Pa. 2011)
- R.G. ex rel. Maria G. v. Downingtown Area School District, 528 F. App'x 153, 156 (3d Cir. 2013)
- A.Y. v. Cumberland Valley School District, 569 F. Supp. 2d 496, 507-08 (M.D. Pa. 2008)
- H.M., ex rel. her parents v. Haddon Heights Board of Education, No. CIV.094293NLHAMD, 2010 WL 2571976, at *5 (D.N.J. June 22, 2010)