

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA

A.E., Individually and as the Court Appointed Plenary Guardian for
the Person and Estate of S.P. v. Mountain View School District

A.E. v. Mountain View School District · No. 3:22-CV-250 · Decided March 12, 2026

SUMMARY

The United States District Court for the Middle District of Pennsylvania denied Mountain View School District’s motion for reconsideration of the denial of summary judgment on the plaintiff’s 42 U.S.C. § 1983 Monell claim. The court held that the complaint adequately alleged a substantive due process claim involving bodily integrity and that the plaintiff was not required to use the specific phrase “state-created danger” where the factual allegations plausibly supported that theory.

CASE DETAILS

COURT	United States District Court for the Middle District of Pennsylvania
WRITING FOR THE COURT	Robert D. Mariani
JURISDICTION	United States District Court for the Middle District of Pennsylvania
DECIDED	March 12, 2026
DOCKET	3:22-CV-250
DISPOSITION	other
PROCEDURAL POSTURE	Defendant moved for reconsideration of the court's prior order denying in part its motion for summary judgment on plaintiff's Title IX and 42 U.S.C. § 1983 claims, specifically challenging the denial of summary judgment on the Monell claim.
STANDARD OF REVIEW	A motion for reconsideration is granted sparingly and requires an intervening change in controlling law, newly available evidence, or the need to correct a clear error of law or fact or prevent manifest injustice.
PRECEDENTIAL VALUE	Unpublished district court memorandum opinion; persuasive, nonprecedential authority.
PARTIES	Mountain View School District v. A.E., individually and as the court-appointed plenary guardian for the person and estate of S.P.

TOPICS

motion for reconsideration

summary judgment

section 1983

due process

civil procedure

PRACTICE AREAS

Civil procedure

Constitutional law

Civil rights litigation

Education law

QUESTIONS PRESENTED

1. Whether reconsideration was warranted because plaintiff did not use the express terms "state-created danger" or "special relationship" in the complaint.
2. Whether the complaint adequately pleaded a Fourteenth Amendment substantive due process claim based on S.P.'s right to bodily integrity and the alleged state-created-danger theory.
3. Whether the prior denial of summary judgment constituted clear error or manifest injustice in light of the pleading and summary judgment record.

HOLDINGS

1. A plaintiff need not use the "magic words" state-created danger in the complaint when the factual allegations plausibly identify a substantive due process violation based on bodily integrity and place the defendant on notice of the factual basis for the claim.
2. Reconsideration was unwarranted because the District failed to carry its summary judgment burden and the record contained genuine disputes of material fact concerning the alleged state-created danger and the District's conduct.
3. The court did not find that a special relationship existed between the District and S.P.; the denial of reconsideration rested on the adequately pleaded and factually supported state-created-danger theory.

KEY QUOTATIONS

"The fact that Plaintiff did not affirmatively plead the magic words "state created danger" in the Complaint, is of little to no consequence here." (at 7)

"The Complaint adequately put MVSD on notice of the factual basis for Plaintiff's allegations." (at 8)

FACTUAL BACKGROUND

Plaintiff alleged that S.P., a student with significant intellectual disabilities, was sexually harassed and assaulted by another student, Student A. Despite knowledge of the prior March 2021 incident and the circumstances surrounding the students, the school district allegedly continued transporting S.P. and Student A together in the same small van. The summary judgment record contained conflicting testimony and evidence concerning what school personnel knew and whether continuing the shared transportation created or enhanced a danger to S.P.

PROCEDURAL HISTORY

Plaintiff brought Title IX and § 1983 claims against Mountain View School District. The District's motion to dismiss was withdrawn pursuant to stipulation, and the District later moved for summary judgment. The court

denied summary judgment on the § 1983 claim because the record contained genuine disputes of material fact and scheduled the case for trial. The District then moved for reconsideration, arguing that plaintiff had not expressly pleaded a state-created-danger or special-relationship exception to the general rule that schools have no constitutional duty to protect students from other students. The court denied reconsideration.

DISPOSITION

other

CASES CITED

- MMG Insurance Co. v. Guiro, Inc., 432 F. Supp. 3d 471, 474 (M.D. Pa. 2020)
- Chesapeake Appalachia, LLC v. Scout Petroleum, LLC, 73 F. Supp. 3d 488, 491 (M.D. Pa. 2014)
- Max's Seafood Café ex rel. Lou-Ann, Inc. v. Quinteros, 176 F.3d 669, 677 (3d Cir. 1999)
- Kropa v. Cabot Oil & Gas Corp., 716 F. Supp. 2d 375, 378 (M.D. Pa. 2010)
- Phillips v. County of Allegheny, 515 F.3d 224, 235 (3d Cir. 2008)
- A.J. v. Mastery Charter High School, 2023 WL 6804576, at *7 (3d Cir. Sept. 20, 2023)
- Morrow v. Balaski, 719 F.3d 160, 165-67, 170 (3d Cir. 2013) (en banc)
- Swanger v. Warrior Run School District, 2012 WL 2395675, at *3-5 (M.D. Pa. June 25, 2012)
- Doe v. Red Lion Area School District, 2025 WL 19819, at *4-5 (M.D. Pa. Jan. 2, 2025)
- DeShaney v. Winnebago County Department of Social Services, 489 U.S. 189, 196-97 (1989)
- Nicini v. Morra, 212 F.3d 798, 806 (3d Cir. 2000)
- Collins v. City of Harker Heights, 503 U.S. 115, 125 (1992)
- D.R. v. Middle Bucks Area Vocational Technical School, 972 F.2d 1364, 1372 (3d Cir. 1992)
- M.T. by and through Amber H. v. Uniontown Area School District, 2021 WL 807713, at *7 (W.D. Pa. Mar. 3, 2021)
- Biddinger v. Hanover Area School District, 2023 WL 6050577, at *2 (M.D. Pa. Sept. 15, 2023)
- Fielder v. Stroudsburg Area School District, 427 F. Supp. 3d 539, 550 (M.D. Pa. 2019)
- Cuvo v. Pocono Mountain School District, 2019 WL 1424524, at *6 (M.D. Pa. Mar. 29, 2019)
- Bennett ex rel. Irvine v. City of Philadelphia, 499 F.3d 281, 286 (3d Cir. 2007)