

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NEW YORK

Jane Doe, on behalf of her minor child, Sarah Doe v. Webster Central School District, Brian Neenan, Margaret Callahan, M.D., and Chris Callahan

6:25-CV-06599 EAW · No. 6:25-CV-06599 EAW · Decided December 31, 2025

SUMMARY

The United States District Court for the Western District of New York denied Jane Doe’s motion for a preliminary injunction seeking to allow her minor daughter to attend school without receiving the Tdap vaccine. The court held that although exclusion from school constituted irreparable harm, the plaintiff had not shown a likelihood of success on her ADA or Rehabilitation Act claims because the record did not establish a qualifying disability or a medically supported contraindication to vaccination. The court also indicated that it would decline supplemental jurisdiction over the related New York Article 78 claim absent viable federal claims.

CASE DETAILS

COURT	United States District Court for the Western District of New York
WRITING FOR THE COURT	Elizabeth A. Wolford
JURISDICTION	United States District Court for the Western District of New York
DECIDED	December 31, 2025
DOCKET	6:25-CV-06599 EAW
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved for a temporary restraining order and preliminary injunction requiring defendants to permit her minor daughter to attend sixth grade and participate in school programs despite the absence of a Tdap vaccination. The court declined to issue an immediate TRO and denied the preliminary injunction.
STANDARD OF REVIEW	To obtain a preliminary injunction affecting government action taken in the public interest under a statutory or regulatory scheme, the movant must show irreparable harm, a likelihood of success on the merits, that the public interest favors relief, and that the balance of equities supports issuance. The movant bears a heightened burden because a preliminary injunction is an extraordinary remedy. The

	irreparable-harm requirement must be satisfied before the remaining requirements are considered.
PRECEDENTIAL VALUE	unpublished district court decision; nonprecedential
PARTIES	Jane Doe, on behalf of her minor child, Sarah Doe v. Webster Central School District, Brian Neenan, Margaret Callahan, M.D., Chris Callahan

TOPICS

injunctions

ada / disability

health law

civil procedure

subject matter jurisdiction

PRACTICE AREAS

health law

civil rights

education law

civil procedure

QUESTIONS PRESENTED

1. Whether plaintiff established the requirements for a preliminary injunction allowing her daughter to attend school without receiving the Tdap vaccine.
2. Whether plaintiff showed a likelihood of success on her ADA and Rehabilitation Act claims by demonstrating that Sarah was a qualified individual with a disability and was excluded because of that disability.
3. Whether the court should exercise supplemental jurisdiction over plaintiff's New York Article 78 claim challenging the denial of the medical exemption.

HOLDINGS

1. The motion for a preliminary injunction was denied because plaintiff failed to establish a likelihood of success on the merits, notwithstanding the court's finding that exclusion from school constituted irreparable harm.
2. Plaintiff failed to show a likelihood of success on the ADA and Rehabilitation Act claims because the record did not establish that Sarah had a physical or mental impairment substantially limiting a major life activity, or that defendants excluded her because of a disability.
3. The court declined to exercise supplemental jurisdiction over the Article 78 claim because the federal claims were unlikely to succeed and Article 78 proceedings are generally matters for New York state courts.

KEY QUOTATIONS

"Because the requisite standard for a preliminary injunction has not been met, and because a child is not entitled to a vaccine exemption just based on a doctor's "say-so," the motion (Dkt. 4) is denied."

(Introduction)

“The record in this case—one that Plaintiff agreed did not need to be expanded at an evidentiary hearing—establishes that Sarah was not excluded from the sixth grade because of her gene mutation or other alleged medical conditions.” (Analysis § III)

FACTUAL BACKGROUND

Sarah Doe, an eleven-year-old child, was excluded from sixth grade after her request for a medical exemption from the Tdap vaccine was denied. The exemption requests relied on an alleged 2019 vaccine reaction, a 2022 hospitalization for MIS-C and septic shock following an asymptomatic COVID-19 infection, and an MTHFR gene mutation, but the record lacked medical proof tying those conditions to a Tdap contraindication or precaution. The school district submitted sworn medical evidence that the asserted conditions were not contraindications or precautions under ACIP guidance or other nationally recognized evidence-based standards, and plaintiff did not provide the additional documentation requested by the district.

PROCEDURAL HISTORY

Plaintiff commenced the federal action on October 22, 2025, asserting claims under Title II of the ADA, section 504 of the Rehabilitation Act, and New York Public Health Law § 2164(8) through an Article 78 mandamus claim. After expedited briefing and oral argument, the court requested supplemental briefing regarding Goe v. Zucker. The court denied preliminary injunctive relief because plaintiff failed to show a likelihood of success on the federal claims and declined to exercise supplemental jurisdiction over the Article 78 claim.

DISPOSITION

other

CASES CITED

- Garcia v. S.U.N.Y. Health Scis. Ctr. of Brooklyn, 280 F.3d 98, 107 (2d Cir. 2001)
- We the Patriots USA, Inc. v. Hochul, 17 F.4th 266, 279-80 (2d Cir. 2021)
- Agudath Israel of Am. v. Cuomo, 983 F.3d 620, 631 (2d Cir. 2020)
- Yang v. Kosinski, Yang v. Kosinski, 960 F.3d 119, 127 (2d Cir. 2020)
- Moore v. Consol. Edison Co. of N.Y., 409 F.3d 506, 510-11 (2d Cir. 2005)
- Mazurek v. Armstrong, 520 U.S. 968, 972 (1997)
- State Farm Mut. Auto. Ins. Co. v. Tri-Borough NY Med. Prac. P.C., 120 F.4th 59, 80 (2d Cir. 2024)
- Faiveley Transp. Malmo AB v. Wabtec Corp., 559 F.3d 110, 118 (2d Cir. 2009)
- Goe v. Zucker, 43 F.4th 19, 26-27, 34-37 (2d Cir. 2022)
- A. J. T. by & through A. T. v. Osseo Area Sch., Indep. Sch. Dist. No. 279, 605 U.S. 335, 339 (2025)
- Henrietta D. v. Bloomberg, 331 F.3d 261, 272 (2d Cir. 2003)
- Weixel v. Bd. of Educ. of City of New York, 287 F.3d 138, 147 (2d Cir. 2002)
- Buotote v. Illinois Tool Works, Inc., 815 F. Supp. 2d 549, 557 (D. Conn. 2011)

- Cecere v. Canisius Univ., No. 1:24-CV-00155 EAW, 2025 WL 712748, at *5 (W.D.N.Y. Mar. 5, 2025), aff'd, No. 25-798-CV, 2025 WL 3239732 (2d Cir. Nov. 20, 2025)
- Perez v. New York Presbyterian/Weill Cornell Med. Ctr., No. 23-CV-6152 (CS), 2024 WL 1514216, at *4-6 (S.D.N.Y. Apr. 8, 2024)
- Crown Castle Fiber LLC v. City of Rochester, 623 F. Supp. 3d 165, 177 (W.D.N.Y. 2022)
- Bartolini v. Cassels, No. 17-cv-5671 (NSR)(PED), 2018 WL 3023161, at *6 (S.D.N.Y. June 18, 2018)
- Nitti v. Cty. of Tioga, No. 3:14-CV-0954 (GTS/DEP), 2015 WL 5708637, at *9 (N.D.N.Y. Sept. 28, 2015)
- Riddles v. Sallie Mae, No. 08-CV-1499 (NG), 2009 WL 3734302, at *2 (E.D.N.Y. Nov. 4, 2009)
- Beckwith v. Erie Cty. Water Auth., 413 F. Supp. 2d 214, 226-27 (W.D.N.Y. 2006)
- A.A.C. on behalf of G.C. v. Starpoint Cent. Sch. Dist., No. 24-CV-1047 (JLS), 2025 WL 1201971, at *20 (W.D.N.Y. Apr. 25, 2025)
- Doe v. Oceanside Union Free Sch. Dist., No. 25-CV-06214(JS)(SIL), 2025 WL 3706756, at *4 (E.D.N.Y. Dec. 22, 2025)
- Miller v. McDonald, 130 F.4th 258, 269 & n.14 (2d Cir. 2025)
- Fulton v. City of Philadelphia, 593 U.S. 522, 537 (2021)