BEFORE THE
OFFICE OF ADMINISTRATIVE HEARINGS
STATE OF CALIFORNIA

IN THE CONSOLIDATED MATTERS INVOLVING:

PARENT ON BEHALF OF STUDENT,

and

MOUNT PLEASANT ELEMENTARY SCHOOL DISTRICT AND EAST SIDE UNION HIGH SCHOOL DISTRICT,

OAH CASE NUMBER 2026010077

OAH CASE NUMBER 2025100468

ORDER DETERMINING AMENDED DUE PROCESS COMPLAINT SUFFICIENT

JUNE 8, 2026

On February 5, 2026, Student filed a complaint with the Office of Administrative Hearings, referred to as OAH, naming Mount Pleasant Elementary School District and East Side Union High School District as respondents. On May 20, 2026, Student filed an amended complaint naming the same respondents.

On May 20, 2026, during the prehearing conference held on that date, OAH granted Student's motion to amend the complaint, deeming the amended complaint

filed on that date. On June 3, 2026, Mount Pleasant filed a timely Notice of Insufficiency as to the complaint.

APPLICABLE LAW

The named parties have the right to challenge the complaint's sufficiency. (20 U.S.C. § 1415(b) & (c).) The party filing the complaint is not entitled to a hearing unless the complaint meets the requirements of title 20 United States Code section 1415(b)(7)(A).

A complaint is sufficient if it: (1) describes the problem relating to the proposed change regarding the Student's identification, evaluation, or educational placement, or providing the Student a free appropriate public education; (2) includes facts about the problem; and (3) includes a proposed resolution to the extent known and available to the party at the time. (20 U.S.C. § 1415(b)(7)(A)(ii)(III) & (IV).) These requirements prevent vague and confusing complaints, and promote fairness by providing the named parties with sufficient information to know how to prepare for the hearing and how to participate in resolution sessions and mediation. (See H.R.Rep. No. 108-77, 1st Sess. (2003), p. 115; Sen. Rep. No. 108-185, 1st Sess. (2003), pp. 34-35.)

The complaint provides enough information when it provides "an awareness and understanding of the issues forming the basis of the complaint." (Sen. Rep. No. 108-185, *supra*, at p. 34.) The pleading requirements should be liberally construed in light of the broad remedial purposes of the IDEA and the relative informality of the due process hearings it authorizes. (*Alexandra R. ex rel. Burke v. Brookline School Dist.* (D.N.H., Sept. 10, 2009, CIV. 06-CV-0215-JL) 2009 WL 2957991[nonpub. Opn.]; *Escambia County Bd. Of Educ. V. Benton* (S.D. Ala. 2005) 406 F.Supp.2d 1248, 1259-1260; *Sammons v. Polk County School Bd.* (M.D. Fla., Oct. 28, 2005, 8:04CV2657T24EAJ) 2005 WL 2850076

[nonpub. Opn.]; but cf. *M.S.-G v. Lenape Regional High School Dist. Bd. Of Educ.* (3d Cir. 2009) 306 Fed.Appx. 772, 775 [nonpub. Opn.].) Whether the complaint is sufficient is a matter within the sound discretion of the Administrative Law Judge. (*Assistance to States for the Educ. Of Children with Disabilities & Preschool Grants for Children with Disabilities* (Aug. 14, 2006) 71 FR 46,540-46541, 46699.)

DISCUSSION

The gravamen of Mount Pleasant's notice of insufficiency consists of Student's failure to identify which Issues raised in the complaint pertain to Mount Pleasant and whether Student alleges any claims preceding the statute of limitations. Mount Pleasant alleges Student attended that school district during the 2023-2024 school year, until Student's withdrawal on March 25, 2024.

Here, the statute of limitations, without considering the discovery rule or exceptions, runs from January 5, 2024 through the filing of the original complaint on January 5, 2026. The filing date of Student's amended complaint relates back to the date of filing of the original complaint. Accordingly, Student has alleged Issues against Mount Pleasant during that time frame. As Student's amended complaint does not allege the discovery rule extended the statute of limitations and does not allege exceptions to the statute of limitations, the school districts can raise that as an affirmative defense at hearing, should the need arise. No issues regarding the statute are resolved by way of this order.

Since Mount Pleasant is an elementary school district and served Student during the earlier time period alleged in the complaint, the complaint is sufficiently pled as to which Issues pertain to Mount Pleasant. As East Side serves high school students and Student attended that school district beginning in the 2024-2025 school year, the

districts can distinguish which Issues pertain to each based upon the time frames they served Student. On that basis, the amended complaint provides Mount Pleasant and East Side with sufficient information to know how to prepare for the hearing and how to participate in resolution sessions and mediation.

Many of Student's Issues necessarily involve specific individualized education programs, which Student has not identified by date. However, the IDEA requires notice pleading. Here, Student has put the school districts on notice of the Issues alleged during a relevant time frame. Student should be prepared to identify IEPs by date during the next prehearing conference to facilitate the ALJs framing of the Issues for hearing.

Nonetheless, Student has pled sufficient facts and Issue statements to provide Mount Pleasant with an awareness and understanding of the issues forming the basis of the complaint. Student's complaint identifies the issues and adequate facts about the problem to permit Mount Pleasant to respond and participate in a resolution session and mediation. Therefore, Student's statement of eight issues or claims is sufficient.

1. The complaint is sufficient under title 20 United States Code section 1415(b)(7)(A)(ii).

2. All mediation, prehearing conference, and hearing dates in this matter are confirmed.

IT IS SO ORDERED.

Ted Mann

Ted Mann

Administrative Law Judge

Office of Administrative Hearings