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Huggins v. School District of Manatee County

United States Court of Appeals, Eleventh Circuit - August 15, 2025 - F.4th - 2025 WL 2374371

Community member, who was allegedly removed from public school-board meeting at which he intended to speak about approval of funds for charter school, brought state-court action against public school board and, in their individual and official capacities, school superintendent, board's chief of security, board's communications director, and city police officer for speech restriction and retaliation under the First Amendment, and for violations of the Fourth Amendment, the equal-protection clause of the Fourteenth Amendment, the equal-benefit clause of § 1981, and state laws.

Following removal, defendants moved to dismiss for failure to state a claim. Member moved to amend his complaint. The United States District Court for the Middle District of Florida denied motion to amend and granted motion to dismiss as to federal claims and declined to exercise supplemental jurisdiction over state-law claims. Member appealed.

The Court of Appeals held that:

- Superintendent was not entitled to qualified immunity from member's First Amendment claims;
- Member stated First Amendment speech-restriction claim against superintendent;
- Member stated First Amendment retaliation claim against superintendent;
- Chief of security and police officer were entitled to qualified immunity from member's First Amendment claims;
- Communications director was entitled to qualified immunity from community member's First Amendment retaliation claim;
- Member failed to show that board had opportunity to review superintendent's decision to remove him from board meeting and agreed with both decision and decision's basis, precluding member's Monell claim against board based on ratification theory; and
- Member was not entitled to leave to amend.

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