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Platt v. Mansfield

United States Court of Appeals, Fourth Circuit - December 22, 2025 - F.4th - 2025 WL 3703412

Plaintiffs, who were interrupted at a county school board public meeting pursuant to a school board policy which prohibited speakers from targeting, criticizing, or attacking individual students during public-comment periods of its public meetings, brought § 1983 action against school board and its chairwoman, contending that, as applied to them, the policy discriminated against particular viewpoint they sought to express, and that the policy was unconstitutionally vague.

The United States District Court denied plaintiffs a preliminary injunction. Plaintiffs appealed.

The Court of Appeals held that:

- District court did not abuse its discretion in implicitly rejecting plaintiffs' argument that reliance on challenged policy was post-hoc rationalization to hide discriminatory motives;
- Plaintiffs did not show a sufficient likelihood of success on the merits of their viewpoint-discrimination claim to support a preliminary injunction; and
- Plaintiffs did not show a sufficient likelihood of success on the merits of their void-for-vagueness claim to support a preliminary injunction.

District court did not abuse its discretion in implicitly rejecting plaintiffs' argument that reliance on challenged policy was post-hoc rationalization to hide discriminatory motives, when denying plaintiffs a preliminary injunction, in plaintiffs' § 1983 action against county school board and its chairwoman, bringing viewpoint-discrimination and void-for-vagueness claims challenging school board policy that chairwoman used to interrupt them at a school board public meeting; while it would have been clearer if chairwoman had directly cited the policy when interrupting plaintiffs, she invoked the policy and quoted relevant language before public-comment period began, providing necessary context for her interruption of plaintiffs' negative comments about an individual student.

Plaintiffs bringing § 1983 action against county school board and its chairwoman, challenging school board policy that chairwoman used to interrupt them at a school board public meeting, did not show a sufficient likelihood of success on the merits of their viewpoint-discrimination claim to support a preliminary injunction; the policy prohibited speakers from targeting, criticizing, or attacking individual students, comparators plaintiffs cited were irrelevant since they at most merely mentioned a student without targeting, criticizing, or attacking the student, cited comparators demonstrated that school board had been consistent in its application of the policy, and plaintiffs were allowed to raise their concerns so long as they did not target, criticize, or attack an individual student.

Plaintiffs bringing § 1983 action against county school board and its chairwoman, challenging school board policy that chairwoman used to interrupt them at a school board public meeting, did not show a sufficient likelihood of success on the merits of their void-for-vagueness claim to support a preliminary injunction; the policy prohibited "comments that target, criticize, or attack individual

students,” each challenged term had a common, readily understandable meaning, and terms were not too subjective to survive constitutional scrutiny.

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