

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA**

Dr. PAGE CAROL WOODS, and Dr.
NATHANIAL WOODS jr. *individually* and
o/b/o N.W., a minor

Plaintiff,

v.

WILLIAMSPORT AREA SCHOOL
DISTRICT and;
RICHARD CASCHERA in his individual
and official capacity and;
DR. JUSTIN ROSS in his individual and
official capacity and;
MR. MATTHEW FISHER in his individual
and official capacity and;
MS. ALICIA DIFFER in her individual
and official capacity and;
JOHN/JANE DOES 1-5.

Defendants.

CIVIL ACTION NO. 4:25-CV-1562

JURY TRIAL DEMANDED

VERIFIED COMPLAINT

Plaintiffs, by and through their undersigned attorneys, bring this Complaint against the above-named Defendants, agents, and successors in office, to safeguard their rights under the United States Constitution, State, and Federal law, and in support thereof allege the following:

PRELIMINARY STATEMENT

1. This is a civil rights action brought under 42 U.S.C. § 1983 to redress the violation of Plaintiff's rights under the Fourth Amendments to the United

States Constitution, the Constitution of the Commonwealth of Pennsylvania and various other theories arising under Federal and State law.

2. Plaintiff, a minor student, was subjected to an unlawful and intrusive seizure by school officials, namely Defendant Caschera, without a warrant, probable cause, or reasonable suspicion.
3. The seizure conducted by Defendants was excessive, unjustified, and conducted without consent, and it invaded Plaintiff's Fourteenth Amendment right to be free of unreasonable searches and seizures of his person. The excessive and unjustified seizure also invades upon Plaintiff's rights under the Pennsylvania Constitution. Pa. Const. Art I § 8.
4. This unlawful seizure, upon information and belief, was motivated by racial animus.
5. At all relevant times, Defendants acted under color of state law and in their official capacities as employees or agents of a public school.
6. This action seeks to hold Defendants accountable for their unconstitutional conduct and to deter similar violations of student rights in the future.
7. Defendants further are liable for tortious conduct including battery, assault and false imprisonment.

JURISDICTION AND VENUE

8. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1343(a)(3), as this action arises under the Constitution and laws of the United States, including 42 U.S.C. § 1983.

9. Venue is proper in the Middle District of Pennsylvania under 28 U.S.C. § 1391(b), as the events giving rise to the claims occurred in this District.

PARTIES

10. Plaintiff Dr. Page Carol Woods is the parent and natural guardian of N.W., a minor child, and a resident of Lycoming County. Plaintiff resides at 46 Fairview Ave, Williamsport, PA 17701.
11. Plaintiff Dr. Nathaniel Woods, jr. is the parent and natural guardian of N.W., a minor child, and a resident of Lycoming County. Plaintiff resides at 46 Fairview Ave, Williamsport, PA 17701.
12. Plaintiff N.W. is a minor, a rising senior in the Williamsport Area School District, attending Williamsport High School. N.W. is a resident of Lycoming County. Plaintiff N.W. resides at 46 Fairview Ave, Williamsport, PA 17701. Plaintiff N.W. is programmed for under a 504 plan.
13. Defendant Williamsport Area School District (the “District”) is a governmental entity organized to provide K-12 educational services. Upon information and belief, Defendant Williamsport Area School District’s primary place of business is 2990 West Fourth Street, Williamsport, PA 1770.
14. Defendant Williamsport Area School District is a “state actor” for all purposes under United States civil rights laws, including 42 U.S.C. § 1983.
15. Defendant Richard Caschera was at all relevant times a teacher in the Homeland Security Program at Williamsport Area High School. As of the

date of this filing Defendant Caschera is not a licensed teacher in the Commonwealth of Pennsylvania.

16. Defendant Dr. Justin Ross was at all relevant times the principal of Williamsport Area High School and was the chief administrator within the school.
17. Defendant Matthew Fisher was at all relevant times the Director of Career and Technical Education of Williamsport Area High School and held administrative responsibilities and authority under the direction of Defendant Ross. Defendant was the direct superior of Defendant Caschera.
18. Defendant Alica Differ was at all relevant times an Associate Principal at Williamsport Area High School specifically tasked with acting as the Associate Principal for the junior and senior class.
19. The true names and capacities, of Defendants JOHN/JANE DOES 1-5 are unknown to the Plaintiffs, who therefore sue these Defendants by such fictitious names. Plaintiffs are informed and believe, and thereon allege, that each of the Defendants designated herein as JOHN/JANE DOES 1-5, are responsible in some manner for the events and wrongful actions described herein and caused injury and damages proximately thereby to Plaintiffs.
20. Plaintiffs will seek leave of this Court to amend this Complaint to insert the true names and capacities of JOHN/JANE DOES a when the same have been ascertained, together with appropriate charging allegations, and adjoin such Defendants in this action.

STATEMENT OF FACTS

21. Upon information and belief, Defendant Caschera was hired as a teacher in the District and began his role on May 5, 2025.
22. Defendant Caschera had no prior teaching experience and was employed directly from industry.
23. According to the Commonwealth of Pennsylvania's available data, Defendant Caschera does not presently hold a teaching credential as of the date of this filing.
24. Defendant Caschera did hold a temporary substitute teaching certificate which the District went to great lengths to shoehorn the eligibility for temporary certification. Such a temporary certification does not require educational requirements. Upon information and belief, the District did not believe they could qualify Defendant Caschera for a long term certification.
25. Defendant Caschera was hired to teach in the Homeland Security program of the Career and Technical Education program.
26. Plaintiff N.W. was a student in that program.
27. On May 28, 2025 Plaintiff N.W. was in Caschera's class. The class was taking a test that day so there was no lecture by Caschera.
28. On that date, N.W. would ask to use the restroom but, for unknown reasons, was denied multiple times.
29. N.W. would then put his head down on his desk.

30. Caschera would react by having another student place smelling salts under N.W.'s nose.

31. N.W. is a student with several significant allergies.

32. When N.W. did not raise his head at a speed sufficient for Caschera's liking, Caschera took extreme action.

33. Caschera would then make other students secure N.W. to a backboard.

34. N.W. was restrained and totally immobilized including a strap at or just below the neck.

35. Caschera would then turn the backboard ninety degrees so the backboard was vertical.

36. N.W. was forced to stand on his toes to avoid the strap pressing on his throat.

37. N.W. was left in this state for several minutes.

38. N.W. had to feign coughing to get Defendant Caschera to let him down.

39. Before allowing N.W. off the backboard Defendant Caschera first asked "are you going to stay awake?"

40. This shows that Defendant undertook this course of conduct solely to punish N.W. for the perception that he was sleeping in class.

41. N.W. was then sent out of class for asking to use the restroom and was given a zero on the test administered that day.

42. N.W. would return home that day and report to his parents what happened that day.

43. Defendant Alicia Differ, the Associate Principal for the junior and senior class, would call Plaintiff Dr. Page Carol Woods, and report that N.W. would be required to serve detention for being sent out of class.
44. Plaintiff Page Carol Woods would report to Defendant Differ the events as described by N.W. Page Carol Woods reports that Defendant Differ was astonished by the events and upon information and belief then contacted Defendant Fisher.
45. Plaintiff Page Carol Woods would have several conversations and meetings over the days that followed with Defendant Differ and Defendant Fisher.
46. Upon information and belief, Defendant Differ and Defendant Fisher spoke with Defendant Caschera who reportedly “did not see the wrong in what he did.” Defendant Caschera would also state that he was holding N.W. to a higher standard than his peers.
47. N.W. would apologize to Defendant Caschera.
48. On May 30, 2025, Plaintiff Page Carol Woods would tell Defendant Fisher that it was only fair that Defendant Caschera also apologize to N.W. for what he put him through.
49. Defendant Fisher indicated this was a reasonable request and upon information and belief gave that direction to Caschera.
50. The following Monday, Defendant Caschera told N.W. through an internal message that he had until 3:00 P.M. to take the make-up test. But then instead forced N.W. to complete the test before the end of class.

51. By Tuesday morning, Defendant Caschera still had not apologized to N.W.

52. Plaintiff Page Carol Woods would again contact Defendant Fisher and

Defendant Differ regarding the apology and the reason for the expeditious make-up test.

53. Defendant Caschera was unable to explain his reason for the expedited make-up test.

54. When Defendant Caschera still did not apologize the District scheduled a meeting with N.W., Defendant Fisher and Defendant Caschera.

55. Defendant Caschera would finally render somewhat of an apologize during that meeting by saying “I apologize, but, when I saw your head down, I went into scenario mode.”

56. The excuse that he was in ‘scenario mode’ does not mesh with his prior statement when he conditioned N.W. being released from confinement on a promise not to sleep in class.

57. It is reported that during this meeting Defendant Caschera would become irate and emotional.

58. Plaintiff Page Carol Woods and Nathaniel Woods Jr. would request a meeting with Defendant Fisher and Defendant Caschera.

59. Upon arrival at the meeting Defendant Fisher would pull the Plaintiffs aside and ask them to remember that Defendant Caschera had only been teaching 15-20 days. This was an attempt to defend and justify the contact and also

serves as an admission that Defendant Caschera was inexperienced and poorly trained.

60. Defendant Ross would also comment to N.W. that he should “give the teacher a chance.” Again an attempt to deflect the seriousness of the situation.

61. Upon information and belief, Defendant Caschera’s courses are currently being covered by a long term substitute for unknown reasons.

62. Upon information and belief, thirteen to fifteen students witnessed the assault.

CAUSES OF ACTION

COUNT I

VIOLATION OF FOURTH AMENDMENT (UNREASONABLE SEARCH AND SEIZURE) - 42 U.S.C. § 1983

Page Carol Woods and Nathaniel Woods Jr; o/b/o N.W. v. All Defendants

63. Plaintiff incorporates preceding paragraphs 1-61 as if set forth fully herein.

64. The Fourth Amendment, made applicable to the states via the Tenth Amendment, protects individuals from unreasonable searches and seizures. *See Mapp v. Ohio*, 367 U.S. 643, 660 (1961).

65. Students possess a legitimate, yet limited, expectation of privacy in their person and possessions within the school environment. *See Cass, supra* at 34-35; (citing *New Jersey v. T.L.O.*, 469 U.S. 325, 355 (1985)).

66. Defendants' seizure of N.W. was unreasonable under the circumstances.

67. In the instant matter N.W.'s person was seized by Defendant Caschera when he restrained N.W. to a backboard.

68. A "seizure" occurs when a person's freedom of movement is terminated by means intentionally applied.

69. Defendants, acting under the color of state law, through his role as an authority figure in the classroom, unlawfully seized and restrained Plaintiff by strapping them to a backboard. This act constituted a seizure without a warrant, probable cause, or any other legal justification.

70. The seizure was objectively unreasonable under the circumstances. Plaintiff posed no threat, and the use of a medical backboard as a form of punishment was an excessive and disproportionate use of force.

71. The Defendants' actions violated Plaintiff's clearly established constitutional right to be free from unreasonable seizure.

72. As a result, Plaintiff suffered and will continue to suffer damages in the form of emotional distress, reputational harm, and other non-economic and compensatory damages, all in an amount to be determined at trial.

WHEREFORE, Plaintiffs now demand judgment against Defendants for all damages allowed under the law, including punitive damages, compensatory damages for physical and emotional harm, medical expenses, costs of this action, and any other relief this Court deems just and proper.

COUNT II

**MUNICIPAL LIABILITY — *MONELL* CLAIM — 42 U.S.C. § 1983 —
CUSTOM, POLICY OR PRACTICE**

Page Carol Woods and Nathaniel Woods Jr, o/b/o N.W. v. Williamsport Area School District

73. Plaintiff incorporates preceding paragraphs 1-62 as if set forth fully herein.

74. The School District is liable under *Monell v. Department of Social Services*, 436 U.S. 658 (1978).

75. Under *Monell*, a municipal entity, such as a school district, can be held liable for the actions of its employees in only select circumstances.

76. The elements of a *Monell* claim are: (1) deprivation of a federal right; (2) some governmental action can be traced to the deprivation, i.e., policy or custom; (3) policy or custom demonstrating the governmental entity's fault, i.e., deliberate indifference; and (4) municipal action that was the moving force behind the federal violation. *Dean v. Wexford Health Service, Inc.*, 18 F.4th 214, 235 (7th Cir. 2021).

77. Relevant to the instant matter, *Monell*, allows for such liability when the action was governed by a practice, policy or custom.

78. Defendant School District maintained and failed to maintain customs, policies, or practices that were the moving force behind the constitutional violations.

79. The District developed a practice of processing teachers for the licensing option with the least restrictive educational requirements. It is this practice

that allowed a teacher with no prior experience and no credentials to be unsupervised in the classroom.

80. The District failed to develop a training program for newly hired staff. Upon review of Defendant Cashcera's employment record there is no record of any training being conducted.

81. The District was fully aware Defendant Caschera was inexperienced and untrained in teaching. The District was aware of the risks associated with such inexperience in the classroom.

82. The Defendants' conduct is the direct and proximate cause of the Plaintiff's harm.

83. As a result, Plaintiff suffered and will continue to suffer damages in the form of emotional distress, reputational harm, and other non-economic and compensatory damages, all in an amount to be determined at trial.

WHEREFORE, Plaintiffs now demand judgment against Defendants for all damages allowed under the law, including punitive damages, compensatory damages for physical and emotional harm, medical expenses, costs of this action, and any other relief this Court deems just and proper.

COUNT III
VIOLATION OF ARTICLE I SECTION 8 OF THE CONSTITUTION OF
THE COMMONWEALTH OF PENNSYLVANIA (UNREASONABLE
SEARCH AND SEIZURE)

Page Carol Woods and Nathaniel Woods Jr, o/b/o N.W. v. Richard Caschera

84. Plaintiff incorporates preceding paragraphs 1-62 as if set forth fully herein.

85. Article 1, Section 8 of the Constitution of the Commonwealth of Pennsylvania protects individuals from unreasonable searches and seizures.

86. “The federal constitution sets the minimum level of constitutional protection below which the states cannot fall.” *Commonwealth v. Cass*, 551 Pa. 25, 32 (1998) (citing *Commonwealth v. Sell*, 504 Pa. 46, 63, 470 A.2d 457, 466 (1983)), *cert. denied*, 525 U.S. 833.

87. Students possess a legitimate, yet limited, expectation of privacy in their person and possessions within the school environment. *See Cass, supra* at 34-35; (citing *New Jersey v. T.L.O.*, 469 U.S. 325, 355 (1985)).

88. The text of the Constitution of the Commonwealth of Pennsylvania is substantially similar to that of the Fourth Amendment of the United States Constitution. Accordingly, when analyzing the level of protection offered by the Pennsylvania Constitution, the Pennsylvania Supreme Court focuses its analysis on case law. *Commonwealth v. Edmunds*, 526 Pa. at 391, 586 A.2d at 895 (Pa., 1991). (*See footnote 1 supra.*)

89. Individualized searches and seizures, of select students, as opposed to general searches of the student body (i.e. locker searches) by school officials are subject to the “reasonable suspicion” standard under the Pennsylvania

Constitution. *Commonwealth v. J.B.*, 719 A.2d 1058, 1060 (Pa.Super. 1998).

There, the Superior Court of the Commonwealth of Pennsylvania applied the reasonableness standard outlined in *T.L.O. Id.*

90. Similarly to *J.B.*, the instant matter was one of an individualized seizure of a student rather than a general seizure of the student body. Accordingly, the *T.L.O.* standard is the applicable standard.

91. Applying the *T.L.O.* standard to the instant matter, the seizure was unlawful and in violation of Plaintiff's rights as secured under the Constitution of the Commonwealth of Pennsylvania.

92. Defendants' seizure of Plaintiff's body was unreasonable under clearly established law.

93. To conduct a search or seizure, school officials must have reasonable suspicion that the search will uncover evidence of a violation of school policy, regulation, or law. *TLO*, 469 U.S. at 378.

94. Here, the Defendants did not have reasonable suspicion they would find evidence of a violation because, even assuming *arguendo* N.W. was sleeping, which is a violation of school policy, seizing his body would not garner evidence of that.

95. Plaintiff had a legitimate expectation of privacy in his body.

96. Defendants violated Plaintiff's rights by conducting an illegal seizure.

97. Defendants acted under color of law by using their position of authority to forcibly restrain N.W. upon a backboard.

98. The Defendants' conduct is the direct and proximate cause of the Plaintiff's harm.

99. As a result, Plaintiff suffered and will continue to suffer damages in the form of emotional distress, reputational harm, and other non-economic and compensatory damages, all in an amount to be determined at trial.

WHEREFORE, Plaintiffs now demand judgment against Defendants for all damages allowed under the law, including punitive damages, compensatory damages for physical and emotional harm, medical expenses, costs of this action, and any other relief this Court deems just and proper

Count IV

Civil Rights Claim – State Created Danger

Page Carol Woods and Nathaniel Woods Jr, o/b/o N.W. v. Williamsport Area School District

100. Plaintiff incorporates preceding paragraphs 1-62 as if set forth fully herein.

101. In order to establish a claim for state created danger the Plaintiffs must establish:

- a. That the Defendant, Caschera, engaged in an affirmative act;
- b. That the act created a danger the Plaintiff, N.W. would not have otherwise been exposed to;
- c. The Defendant, Caschera acted with deliberate indifference to the risk of harm and;

d. The state created danger must have been the proximate cause of Plaintiff N.W.'s injuries.

102. Here, Defendant District took an affirmative act of not only hiring Defendant Caschera but also placed Defendant, Caschera in a room with vulnerable children. Defendant, Caschera had no prior teaching experience, did not qualify for a full teaching license due to the education requirements and was not trained in teaching.

103. Defendant District's actions and omissions as follows directly caused the harm to plaintiff. Specifically Defendant acted to assign Defendant Caschera to a classroom without supervision despite his lack of experience and training;

104. But for the actions and omissions of Defendant District Plaintiff, N.W. would not have been injured.

105. As a result, Plaintiff suffered and will continue to suffer damages in the form of emotional distress, reputational harm, and other non-economic and compensatory damages, all in an amount to be determined at trial.

WHEREFORE, Plaintiffs now demand judgment against Defendants for all damages allowed under the law, including punitive damages, compensatory damages for physical and emotional harm, medical expenses, costs of this action, and any other relief this Court deems just and proper.

Count V
ASSAULT

Page Carol Woods and Nathaniel Woods Jr, o/b/o N.W. v. Richard Caschera

106. Plaintiff incorporates preceding paragraphs 1-62 as if set forth fully herein.

107. On the date of the incident at issues in this dispute, the Plaintiff N.W., a minor, was lawfully present on the premises of Williamsport Area High School, a public school operated by Defendant District.

108. While Plaintiff, N.W. a minor, was present in a classroom or other school setting, Defendant Caschera, without legal justification or provocation, intentionally engaged in an act—namely, shoving smelling salts in the face of N.W. —that placed Plaintiff, N.W. in immediate apprehension of harmful or offensive bodily contact.

109. Defendant Caschera then again assaulted N.W. by having N.W. forcibly secured to a backboard which escalated N.W.'s reasonable apprehension causing him to think that he may be assaulted yet again.

110. Defendant Caschera's conduct was intentional and undertaken with the specific purpose of causing Plaintiff, N.W. to fear imminent harmful or offensive contact, or with knowledge that such fear was substantially certain to result. Defendant Caschera was fully aware that Plaintiff N.W. was a minor whereas Defendant Caschera was a grown adult.

111. As a direct and proximate result of Defendant Caschera's actions, Plaintiff, N.W. suffered reasonable and actual apprehension of immediate

bodily harm, emotional distress, fear, anxiety, and related injuries which continues to this day.

112. Defendant Caschera's conduct was outrageous, unjustified, and undertaken in reckless disregard of Plaintiff, N.W.'s personal safety, especially considering the teacher-student relationship and Plaintiff N.W. status as a minor.

113. Plaintiffs also seek punitive damages against Defendant Caschera due to the willful, wanton, and malicious nature of her conduct.

WHEREFORE, Plaintiffs now demand judgment against Defendants for all damages allowed under the law, including punitive damages, compensatory damages for physical and emotional harm, medical expenses, costs of this action, and any other relief this Court deems just and proper.

COUNT VI BATTERY

Page Carol Woods and Nathaniel Woods Jr, o/b/o N.W. v. Richard Caschera

114. Plaintiff incorporates preceding paragraphs 1-62 as if set forth fully herein.

115. On the date of the incident at issues in this dispute, the Plaintiff N.W.. a minor, was lawfully present on the premises of Williamsport Area High School, a public school operated by Defendant District.

116. While Plaintiff, N.W. a minor, was present in a classroom or other school setting, Defendant Caschera, without legal justification or provocation,

intentionally engaged in an act—namely, having N.W. forcibly restrained to a backboard.

117. Defendant Caschera's conduct was intentional and undertaken with the specific purpose of causing offensive contact to Plaintiff, N.W. Defendant Caschera was fully aware that Plaintiff N.W. was a minor whereas Defendant Caschera was a grown adult.

118. N.W. did not consent to the contact.

119. As a direct and proximate result of Defendant Caschera's actions, Plaintiff, N.W. suffered reasonable and actual apprehension of immediate bodily harm, emotional distress, fear, anxiety, and related injuries which continues to this day.

120. Defendant Caschera's conduct was outrageous, unjustified, and undertaken in reckless disregard of Plaintiff, N.W.'s personal safety, especially considering the teacher-student relationship and Plaintiff N.W. status as a minor.

121. Plaintiffs also seek punitive damages against Defendant Caschera due to the willful, wanton, and malicious nature of her conduct.

WHEREFORE, Plaintiffs now demand judgment against Defendants for all damages allowed under the law, including punitive damages, compensatory damages for physical and emotional harm, medical expenses, costs of this action, and any other relief this Court deems just and proper.

COUNT VII

Intentional Infliction of Emotional Distress (IIED)

Page Carol Woods and Nathaniel Woods Jr, o/b/o N.W. v. Richard Caschera

122. Plaintiff incorporates preceding paragraphs 1-62 as if set forth fully herein.
123. At all times relevant hereto, Defendant Caschera was employed by Defendant District and was acting under color of state law and within the scope of their employment and/or agency.
124. While Plaintiff N.W. a minor, was present in a classroom or educational setting at Defendant, Williamsport Area School District, Defendant Caschera without justification or provocation, intentionally and forcefully restrained N.W.
125. Defendant Caschera's conduct was extreme and outrageous, exceeding all bounds of decency typically tolerated in a civilized society, particularly in the context of a teacher-student relationship, where the teacher occupies a position of authority and trust and even more so when the teacher-student relationship is between a kindergarten child and an adult teacher.
126. Defendant Caschera intentionally or recklessly engaged in conduct with the knowledge that it was substantially certain to cause severe emotional distress to the Plaintiff, N.W. or acted with reckless disregard of the high probability that emotional distress would result.
127. Plaintiff, N.W. a minor, suffered severe emotional distress, including but not limited to anxiety, fear, trauma, mental anguish, and disruption of her

academic and social development, as a direct and proximate result of Defendant's conduct.

WHEREFORE, Plaintiffs now demand judgment against Defendants for all damages allowed under the law, including compensatory damages for physical and emotional harm, medical expenses, costs of this action, and any other relief this Court deems just and proper.

**COUNT VIII
FALSE IMPRISONMENT**

Page Carol Woods and Nathaniel Woods Jr, o/b/o N.W. v. Richard Caschera

128. Plaintiffs hereby reallege all matters set forth in the preceding paragraphs 1-62 of this complaint and incorporate them herein.
129. In order to establish a claim for false imprisonment, the Plaintiff must show: (1) a willful detention; (2) without consent and; (3) a deprivation of liberty.
130. Here, the Richard Caschera was aware he was detaining N.W.
131. There is evidence that it was without consent, as he asked to get down and Defendant Caschera stated he was only letting him down based on his averment not to sleep in class more.
132. N.W.'s liberty was deprived as he was unable to move freely, was confined to a backboard, and was denied all freedom of movement.
133. Accordingly, Plaintiff has established that the Defendants falsely imprisoned N.W.

COUNT IX
DECLARATORY RELIEF

Page Carol Woods and Nathaniel Woods Jr., o/b/o N.W. v. All Defendants

134. Plaintiffs incorporate by reference all preceding paragraphs 1 through 62 as if fully set forth herein.

135. This claim is brought pursuant to 28 U.S.C. §§ 2201 and 2202, which authorize this Court to declare the rights and legal relations of the parties and to grant such further necessary or proper relief based on such declarations.

136. An actual controversy exists between the parties concerning the legality and constitutionality of the actions taken by Defendants, including but not limited to:

- The physical seizure and restraint of Plaintiff N.W. without legal justification or probable cause;
- The failure of the District to properly supervise, train, or credential its staff in a manner that protects students from excessive or punitive physical measures;
- The implementation of policies and practices that enabled unqualified personnel to interact with students without adequate oversight;
- The retaliation against N.W. and denial of academic opportunities following the incident;
- The Defendants' failure to follow basic standards of student safety and constitutional protections in educational settings.

137. These actions give rise to continuing harm to Plaintiff N.W. and the risk of future recurrence if not addressed by the Court.

138. Accordingly, Plaintiffs seek a declaratory judgment that:

- The conduct of the Defendants violated Plaintiff N.W.'s rights under the Fourth and Fourteenth Amendments to the United States Constitution;
- The conduct of the Defendants violated Plaintiff N.W.'s rights under Article I, Section 8 of the Pennsylvania Constitution;
- The policies, customs, and practices of the Williamsport Area School District that allowed such conduct to occur are unconstitutional and unlawful under 42 U.S.C. § 1983;
- The individual Defendants' actions constituted unlawful and excessive punishment in an educational setting.

WHEREFORE, Plaintiffs respectfully request that this Court enter judgment in their favor and against all Defendants, and issue declaratory relief as set forth above, along with such further relief as this Court deems just and proper.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court:

- A. Enter judgment in favor of Plaintiff and against all Defendants;
- B. Award compensatory damages in an amount to be determined at trial;
- C. Award punitive damages against the individual Defendants;

D. Award reasonable attorney's fees and costs pursuant to 42 U.S.C. § 1988;

E. Grant declaratory relief stating that Defendants' actions violated Plaintiff's constitutional rights; and

F. Grant such other relief as the Court deems just and proper.

JURY DEMAND

Plaintiff demands a trial by jury on all issues so triable.

DATED: August 21, 2025

/s/ Joseph W. Montgomery

Joseph W. Montgomery, Esq.

Montgomery Law Group, PLLC

Attorneys for Plaintiff

1420 Locust St, Suite 420

Philadelphia, PA 19102

T: (267) 401-5252

F: (888) 954-5529

Principal email address:

Joe@educationlawyers.com

Secondary email

(NOT for Service of Pleadings and Documents)

lynn@iwantjustice.com

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Page Carol Woods and Nathaniel Woods Jr obo N.W. a minor

(b) County of Residence of First Listed Plaintiff _____
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Montgomery Law Group, 1420 Locust St, Suite 420, Phil
PA 19102, 267-401-5252

DEFENDANTS

Williamsport Area School District, Richard Caschera, Justin

Ross, Matthew Fisher and Alice Differ

County of Residence of First Listed Defendant _____
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question
(U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity
(Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/ Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 INTELLECTUAL PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input checked="" type="checkbox"/> 448 Education PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Section 1983 - Fourth Amendment

Brief description of cause:

Illegal seizure of a students person

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

8/21/2025

SIGNATURE OF ATTORNEY OF RECORD

s/ Kyle Anthony Adams

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
 - (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
 - (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
- United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here. United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
- Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
- Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.
- Original Proceedings. (1) Cases which originate in the United States district courts.
- Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
- Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
- Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
- Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
- Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
- Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
- PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
- Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
- Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related cases, if any. If there are related cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.