

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
ARKANSAS, NORTHERN DIVISION

**Larry Towner v. Bold Team LLC; Annie Iselin; and Tammie
Hutchinson**

No. 3:25-cv-249-DPM · No. No. 3:25-cv-249-DPM · Decided January 20, 2026

SUMMARY

The United States District Court for the Eastern District of Arkansas denies Larry Towner’s motion to file under seal and directs the Clerk to unseal the case and filings. The Court also denies his incomplete application to proceed in forma pauperis, giving him until February 20, 2026, to submit a completed application or pay the required fees, or face dismissal without prejudice.

CASE DETAILS

COURT	United States District Court for the Eastern District of Arkansas, Northern Division
WRITING FOR THE COURT	D.P. Marshall Jr.
JURISDICTION	United States District Court for the Eastern District of Arkansas, Northern Division
DECIDED	January 20, 2026
DOCKET	No. 3:25-cv-249-DPM
DISPOSITION	other
PROCEDURAL POSTURE	At the outset of the federal action, the plaintiff moved to file under seal and to proceed in forma pauperis.
PRECEDENTIAL VALUE	Unpublished district court order; limited persuasive value

TOPICS

[civil procedure](#) [pleadings](#)

PRACTICE AREAS

[Civil procedure](#) [Access to court records](#) [In forma pauperis proceedings](#)

QUESTIONS PRESENTED

- Whether Towner established extraordinary circumstances sufficient to justify sealing the court's records.

2. Whether Towner's incomplete in forma pauperis application justified denial of his request to proceed without prepaying fees.

HOLDINGS

1. The motion to file under seal was properly denied because Towner did not show extraordinary circumstances warranting closure of the court's records.
2. The motion to proceed in forma pauperis was denied because the application was incomplete.

KEY QUOTATIONS

“Absent extraordinary circumstances, which Towner hasn’t shown, the Court’s records should be open to the public.” (Order ¶ 1)

FACTUAL BACKGROUND

Towner sought to maintain the court's records under seal but did not demonstrate extraordinary circumstances warranting closure. He also submitted an incomplete in forma pauperis application, responding mostly "N/A" or leaving questions unanswered. The court gave him an opportunity to submit a completed application or pay the filing and administrative fees.

PROCEDURAL HISTORY

Towner filed the action and submitted motions to proceed under seal and in forma pauperis. The district court denied both motions, ordered the case unsealed, and directed Towner either to submit a completed in forma pauperis application or pay the required fees by February 20, 2026, warning that failure to do so would result in dismissal without prejudice.

DISPOSITION

other

CASES CITED

- IDT Corp. v. eBay, 709 F.3d 1220, 1222-23 (8th Cir. 2013)