

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF  
OHIO, EASTERN DIVISION

Casey Williams v. The Village of Junction City, et al.

Williams · No. 2:25-cv-1507 · Decided January 2, 2026

SUMMARY

The United States District Court for the Southern District of Ohio denies Plaintiff Casey Williams’s motion to seal the complaint and future pleadings referring to sealed Ohio criminal records. The court holds that Ohio’s state-court sealing statute does not overcome the strong federal presumption of public access to judicial records and that the motion fails to provide the document-specific, compelling reasons required by Sixth Circuit precedent.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                   |
|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Southern District of Ohio, Eastern Division                                                                                                                                                                  |
| WRITING FOR THE COURT | Chelsey M. Vascura                                                                                                                                                                                                                                |
| JURISDICTION          | United States District Court for the Southern District of Ohio, Eastern Division                                                                                                                                                                  |
| DECIDED               | January 2, 2026                                                                                                                                                                                                                                   |
| DOCKET                | 2:25-cv-1507                                                                                                                                                                                                                                      |
| DISPOSITION           | other                                                                                                                                                                                                                                             |
| PROCEDURAL POSTURE    | Plaintiff moved to seal the Complaint and all subsequent pleadings that mention or discuss his sealed criminal records. The district court denied the motion.                                                                                     |
| STANDARD OF REVIEW    | The court applied the Sixth Circuit's standard governing motions to seal judicial records, requiring the proponent to identify compelling reasons for secrecy and provide a detailed, document-by-document analysis supported by legal citations. |
| PRECEDENTIAL VALUE    | Unknown; federal district court order                                                                                                                                                                                                             |
| PARTIES               | Casey Williams v. The Village of Junction City, Amy English, et al.                                                                                                                                                                               |

TOPICS

- public records
- civil procedure
- civil rights

## PRACTICE AREAS

Civil procedure

Civil rights

## QUESTIONS PRESENTED

1. Whether the Complaint and all subsequent pleadings referring to Plaintiff's Ohio-sealed criminal records should be filed under seal in federal court.
2. Whether Ohio Revised Code § 2953.32, standing alone, provides sufficient grounds to overcome the presumption of public access to federal judicial records.

## HOLDINGS

1. A party seeking to seal federal judicial records must establish compelling reasons for secrecy through a detailed, document-by-document analysis supported by reasons and legal citations; Plaintiff's generalized reliance on the state sealing order did not satisfy that standard.
2. Ohio Revised Code § 2953.32 does not, by itself, provide sufficient grounds to overcome the presumption of public access to federal court records or require the federal court to seal pleadings containing references to records sealed by an Ohio court.

## KEY QUOTATIONS

*"There is a strong presumption in favor of public access to judicial records."*

*"Only for the most compelling reasons."* (825 F.3d at 305)

*"The proponent of sealing therefore must 'analyze in detail, document by document, the propriety of secrecy, providing reasons and legal citations.'" (825 F.3d at 305)*

*"Because Plaintiff relied solely on § 2953.32 as grounds for sealing the Complaint and subsequent pleadings referencing Plaintiff's criminal records, and because § 2953.32 does not provide sufficient grounds to overcome the presumption of public access to federal court records, Plaintiff's Motion (ECF No. 2) is DENIED."*

## FACTUAL BACKGROUND

Plaintiff's Complaint referenced criminal records that had been sealed by an Ohio court under Ohio Revised Code § 2953.32. Plaintiff sought to seal the Complaint and all later pleadings discussing those records. His claims placed the records and the conduct of officials involved in his prosecution at issue, and Ohio law permitted a law enforcement officer involved in the case to inspect the sealed records for use in defending a related civil action.

## PROCEDURAL HISTORY

Plaintiff filed a civil action asserting retaliatory and malicious prosecution claims against officials involved in his prosecution. He then moved to seal the Complaint and future pleadings referring to criminal records sealed by an Ohio state court. The federal district court denied the motion because Plaintiff failed to provide document-

specific compelling reasons overcoming the presumption of public access, and Ohio Revised Code § 2953.32 did not independently require sealing in federal court.

## DISPOSITION

other

## CASES CITED

- Stanley v. Turner Oil & Gas Properties, Inc., No. 2:16-CV-386, 2017 WL 5068444, at \*1 (S.D. Ohio July 24, 2017)
- Shane Grp., Inc. v. Blue Cross Blue Shield of Michigan, 825 F.3d 299, 305 (6th Cir. 2016)
- In re Knoxville News–Sentinel Co., 723 F.2d 470, 476 (6th Cir. 1983)
- White v. Wilberforce Univ., No. 1:16-CV-1165, 2017 WL 3537233, at \*2 (S.D. Ohio Aug. 17, 2017)
- Rudd Equip. Co., Inc. v. John Deere Constr. & Forestry Co., 834 F.3d 589, 594–95 (6th Cir. 2016)
- Baxter Int’l, Inc. v. Abbott Labs., 297 F.3d 544, 548 (7th Cir. 2002)
- Morrison v. Bd. of Trs. of Green Twp., 529 F. Supp. 2d 807, 819 (S.D. Ohio 2007), aff’d, 583 F.3d 394 (6th Cir. 2009)
- Karl v. Bizar, No. 2:09-cv-34, 2009 WL 3644115, at \*3–4 (S.D. Ohio Oct. 28, 2009)
- Raj Plastic Surgery, LLC v. Raj, No. 1:20-CV-00751, 2020 WL 4582690, at \*2–3 (N.D. Ohio Aug. 10, 2020)