

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

M.B. v. County of Butte

No. 2:23-cv-1977-TLN-SCR (E.D. Cal. July 21, 2025) · No. 2:23-cv-1977-TLN-SCR · Decided July 22, 2025

SUMMARY

The United States District Court for the Eastern District of California grants in part and denies in part Plaintiff M.B.’s motions to compel further responses to document requests and subpoenas. The dispute concerns production of unredacted personal identifying information relating to victims, witnesses, and reporters connected to allegations of abuse involving a foster caregiver. Applying the Maldonado privacy-balancing framework, the court evaluates the relevance of the requested information against the privacy interests protected by California law.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Sean C. Riordan
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	July 22, 2025
DOCKET	2:23-cv-1977-TLN-SCR
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved to compel Defendant Butte County and third-party entities Northern California Youth and Family Programs and California Department of Social Services, Community Care Licensing, to provide further discovery responses and produce previously redacted personal identifying information.
STANDARD OF REVIEW	Discovery relevance and proportionality under Federal Rule of Civil Procedure 26(b)(1), together with the court's authority to limit discovery and issue protective orders under Rules 26(b)(2)(B)-(C) and 26(c); motions to compel under Rule 37(a).
PRECEDENTIAL VALUE	district court order; precedential status not stated

TOPICS

- discovery dispute
- civil procedure
- section 1983
- municipal liability
- government liability

PRACTICE AREAS

civil procedure

civil rights

municipal liability

child welfare

discovery privacy

QUESTIONS PRESENTED

1. Whether the redacted personal identifying information was sufficiently relevant to Plaintiff's federal civil-rights and municipal-liability claims to warrant disclosure.
2. Whether the privacy interests protected by California juvenile-record, foster-care, and mandatory-reporter laws outweighed the need for the requested discovery under the five-factor Maldonado balancing framework.
3. Which categories of personal identifying information had to be produced and which could remain redacted.

HOLDINGS

1. Information concerning substantiated, unsubstantiated, inconclusive, evaluated-out, and post-event referrals could be relevant to whether County officials should have recognized a substantial risk that Hastings posed a danger, although the significance of each category varied.
2. Applying the Maldonado five-factor framework, disclosure was warranted for the personal identifying information of parents or guardians and mandatory reporters associated with any referral against Hastings, and for juvenile information meeting the previously defined category of Highly Relevant PII. Juvenile identifying information outside that category could remain redacted.

KEY QUOTATIONS

“As a general rule, discovery may be obtained regarding “any nonprivileged matter that is relevant to any party’s claim or defense and proportional to the needs of the case.”” (at 4)

“It has also held that any reports of child abuse, even those found unsubstantiated or inconclusive, “can reveal patterns that might not otherwise be detected and can be useful to law enforcement.”” (at 11)

“On balance, given both the relevance of the information at issue and the relative privacy interests impinged, disclosure of the PII for any mandatory reporter, as well as any parent or guardian, referenced in the redacted documents is warranted.” (at 16)

FACTUAL BACKGROUND

The underlying action alleges that Butte County officials removed eight-year-old M.B. from her parents' home without a warrant and placed her with Eugene Hastings despite prior abuse investigations. M.B. alleges that Hastings sexually abused her during the eight days she remained in his care and that officials failed to respond adequately or disclose the abuse. Discovery records contained information about multiple prior and subsequent abuse referrals involving Hastings, but the responding parties redacted the identifying information of minors, parents, guardians, witnesses, and mandatory reporters.

PROCEDURAL HISTORY

Plaintiff filed a federal civil-rights action arising from her removal from her parents' home and alleged sexual abuse while placed in foster care. During discovery, Plaintiff sought unredacted personal identifying information from records concerning the foster parent who allegedly abused her. The court previously ordered production of highly relevant identifying information, and Plaintiff filed the present motions to compel additional information concerning victims, witnesses, parents or guardians, and mandatory reporters. After hearing argument on July 10, 2025, the court granted the motions in part and denied them in part.

DISPOSITION

other

CASES CITED

- Maldonado v. Sec'y of the Cal. Dep't of Corr. & Rehab., No. 2:06-cv-02696-MCE/GGH, 2007 WL 4249811, at *5 (E.D. Cal. Nov. 30, 2007)
- Pagano v. Oroville Hospital, 145 F.R.D. 683, 698-99 (E.D. Cal. 1993)
- U.S. Intern. Trade Commission v. ASAT, Inc., 411 F.3d 245, 254 (D.C. Cir. 2005)
- Camden Iron & Metal, Inc. v. Marubeni America Corp., 138 F.R.D. 438, 441 (D.N.J. 1991)
- SEC v. Credit Bancorp., Ltd., 194 F.R.D. 469, 471-72 (S.D.N.Y. 2000)
- Jackson v. County of Sacramento, 175 F.R.D. 653, 654 (E.D. Cal. 1997)
- Momox-Caselis v. Donohue, 987 F.3d 835, 845 (9th Cir. 2021)
- Henry v. Cnty. of Shasta, 132 F.3d 512, 519 (9th Cir. 1997)
- Endy v. Cnty. of Los Angeles, 975 F.3d 757, 769 (9th Cir. 2020)
- Humphries v. County of Los Angeles, 554 F.3d 1170, 1194 (9th Cir. 2009)
- Doe No. 59 v. Santa Rosa City Schools, No. 3:16-cv-01256-WHO, 2017 WL 1183774 (N.D. Cal. Mar. 1, 2017)
- Meyer v. Cty. of San Diego, No. 21-cv-341-RSH-BLM, 2024 WL 86603 (S.D. Cal. Jan. 8, 2024)