

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Bueno Zaragoza v. Lynch

Bueno Zaragoza · No. 2:21-cv-02294 TLN-JDP · Decided March 12, 2025

SUMMARY

The United States District Court for the Eastern District of California grants Defendants’ unopposed request to file video surveillance evidence under seal. The court finds compelling reasons for sealing the evidence in connection with a motion for summary judgment and directs the Clerk to file the video and sealing request under seal.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Troy L. Nunley
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	March 12, 2025
DOCKET	2:21-cv-02294 TLN-JDP
DISPOSITION	other
PROCEDURAL POSTURE	Defendants moved for summary judgment and submitted an unopposed request to file surveillance video evidence under seal.
STANDARD OF REVIEW	Requests to seal documents related to dispositive motions require a showing of compelling reasons supported by specific factual findings that outweigh the public’s presumptive right of access.
PRECEDENTIAL VALUE	Unknown

TOPICS

- summary judgment
- evidence
- civil procedure

PRACTICE AREAS

- civil procedure
- evidence

QUESTIONS PRESENTED

1. Whether the video surveillance evidence submitted in connection with a motion for summary judgment should be filed under seal.

HOLDINGS

1. The video surveillance evidence may be filed under seal because compelling reasons exist to overcome the strong presumption of public access to judicial records.

KEY QUOTATIONS

“There is “a strong presumption in favor of access to court records.”” (at 2)

“For dispositive motions, such as a motion for summary judgment, a request to seal can be granted only if the moving party offers a “compelling reason” to keep the information in question from the public.” (at 2)

“The party seeking to seal must “articulate compelling reasons supported by specific factual findings, that outweigh the general history of access and the public policies favoring disclosure, such as the public interest in understanding the judicial process.”” (at 2)

FACTUAL BACKGROUND

Defendants submitted video surveillance footage in connection with their motion for summary judgment. The footage contained confidential and sensitive information, and defendants requested that it be filed under seal pursuant to Local Rule 141; the request was unopposed.

PROCEDURAL HISTORY

Defendants filed a motion for summary judgment on January 23, 2025. After plaintiff's counsel indicated that surveillance video would be submitted in opposition, defense counsel filed the video evidence with an unopposed request under Local Rule 141 to seal it; the court granted the request.

DISPOSITION

other

CASES CITED

- Ctr. for Auto Safety v. Chrysler Grp., LLC, 809 F.3d 1092, 1096-97 (9th Cir. 2016)
- Kamakana v. City & Cnty. of Honolulu, 447 F.3d 1172, 1178-79 (9th Cir. 2006)
- Xie v. De Young Properties 5418, LP, No. 16-01518, 2018 WL 3241068, at *2 (E.D. Cal. July 2, 2018)

OPINION

1 2 3 4 5 6 7 8 IN THE UNITED STATES DISTRICT COURT 9 EASTERN DISTRICT OF
CALIFORNIA 10 11 MA ROSARIO BUENO ZARAGOZA, an 2:21-cv-02294 TLN-JDP 12
individual; ESTATE OF LUIS GIOVANNY AGUILAR, deceased, by his successor-in- ORDER

13 interest Ma Rosario Bueno Zaragoza, 14 Plaintiffs, 15 v. 16 JEFFREY W. LYNCH, an individual, and 17 DOES 1 through 30, inclusive, 18 Defendants.

19 20 21 22 On January 23, 2025, Defendants filed a motion for summary judgment. (ECF No. 84.) 23 Plaintiff's counsel informed defense counsel that she intended to submit video surveillance 24 footage evidence in support of her opposition to Defendants' motion, and on February 18, 2025, 25 defense counsel submitted the video evidence, along with an unopposed request under Local Rule 26 141 that the video evidence be filed under seal because it contains confidential and sensitive 27 information.

28] There is "a strong presumption in favor of access to court records." Ctr. for Auto Safety v. 2 || Chrysler Grp., LLC, 809 F.3d 1092, 1096 (9th Cir. 2016) (citation omitted). However, "access to 3 || judicial records is not absolute." Kamakana v. City & Cnty. of Honolulu, 447 F.3d 1172, 1178 4 || (9th Cir. 2006).

For dispositive motions, such as a motion for summary judgment, a request to 5 || seal can be granted only if the moving party offers a "compelling reason" to keep the information 6 || in question from the public. Ctr. for Auto Safety, 809 F.3d at 1096-97 (quoting Kamakana, 447 7 || F.3d at 1179); see also Xie v. De Young Properties 5418, LP, No. 16-01518, 2018 WL 3241068, 8 || at *2 (E.D.

Cal. July 2, 2018). The party seeking to seal must "articulate compelling reasons 9 || supported by specific factual findings, that outweigh the general history of access and the public 10 || policies favoring disclosure, such as the public interest in understanding the judicial process." 11 || Kamakana, 447 F.3d at 1178 (internal marks and citations omitted).

12 Having considered the request to seal documents, the Court finds that compelling reasons 13 || exist to file the video evidence under seal. Accordingly, the request to seal the video evidence is 14 || GRANTED. The Clerk of Court is DIRECTED to file the video evidence under seal along with 15 || the request to seal in order to preserve the record. 16 IT IS SO ORDERED.

18 | DATED: March 11, 2025 19 Troy L. Nunl y Chief United States District Judge 20 21 22 23 24 25 26 27 28