

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MISSOURI, EASTERN DIVISION

**NRRM, LLC, doing business as CarShield, et al. v. Pelican
Investment Holdings, LLC, et al.**

No. 4:25-CV-1566 HEA (E.D. Mo. Feb. 20, 2026) · No. No. 4:25-CV-1566 HEA · Decided February 20, 2026

SUMMARY

The United States District Court for the Eastern District of Missouri granted in part and denied in part motions concerning expedited discovery and a protective order in litigation alleging false advertising, unfair competition, tortious interference, and trade secret misappropriation. The court authorized limited expedited discovery between CarShield and Pelican concerning issues relevant to CarShield’s pending preliminary-injunction motion, and ordered a separate protective order adopting Plaintiffs’ proposed terms for access to attorneys-eyes-only materials. The court also granted CarShield’s unopposed request for a preliminary-injunction hearing, scheduled for April 2, 2026.

CASE DETAILS

COURT	United States District Court for the Eastern District of Missouri, Eastern Division
JURISDICTION	United States District Court for the Eastern District of Missouri, Eastern Division
DECIDED	February 20, 2026
DOCKET	No. 4:25-CV-1566 HEA
DISPOSITION	other
PROCEDURAL POSTURE	The court ruled on plaintiffs' motion for expedited and limited discovery and motion for a preliminary-injunction hearing, and defendants' motion for a protective order, while the underlying motion for preliminary injunction and defendants' motion to dismiss remained pending.
STANDARD OF REVIEW	For expedited discovery, the court applied a good-cause standard under which the requesting party must show that the need for expedited discovery, in light of the administration of justice, outweighs prejudice to the responding party. For a protective order, the moving party must demonstrate good cause, including specific harm or prejudice that would result without protection, while the court also considers hardship to the nonmoving party.

PRECEDENTIAL VALUE	unknown
PARTIES	NRRM, LLC, doing business as CarShield, American Auto Shield, LLC v. Pelican Investment Holdings, LLC, National Administrative Service Co., LLC, Sing for Service, LLC, doing business as Mepco

TOPICS

discovery dispute injunctions trademark infringement trade secrets civil procedure

PRACTICE AREAS

Civil procedure Intellectual property Trademark litigation Trade secrets Commercial litigation

QUESTIONS PRESENTED

1. Whether CarShield and AAS showed good cause for expedited discovery before the Rule 26(f) conference to support CarShield's pending preliminary-injunction motion.
2. Whether AAS was entitled to expedited discovery even though it was not a party to the pending preliminary-injunction motion.
3. Whether defendants demonstrated good cause for a protective order and for restricting access to attorneys-eyes-only materials more than plaintiffs proposed.
4. Whether CarShield was entitled to a hearing on its pending motion for a preliminary injunction.

HOLDINGS

1. CarShield demonstrated good cause for limited, expedited discovery because the discovery was relevant to its false-advertising claim and preliminary-injunction motion, would create a more complete record for the hearing, and the interests of justice outweighed potential prejudice to Pelican.
2. AAS was not entitled to expedited discovery because it was not a party to the pending motion for a preliminary injunction.
3. Defendants demonstrated sufficient grounds for entry of a protective order, but failed to show specific harm or prejudice that justified rejecting CarShield's proposal allowing one qualified in-house attorney to access attorneys-eyes-only materials.
4. CarShield was entitled to a hearing on its pending motion for a preliminary injunction.

KEY QUOTATIONS

“Under the good cause standard, the party requesting expedited discovery must show that the need for expedited discovery, in consideration of administration of justice, outweighs prejudice to the responding party.” (at 3)

“Good cause includes a showing of specific harm or prejudice that will result if protections are not ordered, and a party must make “a particular and specific demonstration of fact, as distinguished from stereotype and conclusory statements.”” (at 6)

FACTUAL BACKGROUND

Plaintiffs alleged that Pelican's sales agents contacted CarShield customers and made false or misleading statements intended to induce customers to cancel CarShield vehicle-protection plans and purchase Pelican products. CarShield's pending preliminary-injunction motion sought to prohibit Pelican from disseminating false or misleading statements about CarShield. The requested discovery concerned Pelican's sales-call recordings, training scripts, customer-list sources, and related information, while defendants contended that the discovery implicated proprietary business information.

PROCEDURAL HISTORY

Plaintiffs brought claims for false advertising, unfair competition, tortious interference, and trade-secret misappropriation. CarShield and AAS moved for expedited discovery under Federal Rule of Civil Procedure 26(d)(1) to develop the record for CarShield's pending preliminary-injunction motion. Defendants moved for a protective order under Rule 26(c). The court granted expedited discovery for CarShield but denied it for AAS, granted a protective order in part using plaintiffs' proposed AEO terms, and granted CarShield's request for a preliminary-injunction hearing.

DISPOSITION

other

CASES CITED

- Barton v. Proctor & Gamble Co., No. 1:22-CV-51 JAR, 2022 WL 2713107, at *2 (E.D. Mo. July 13, 2022)
- Monsanto Co. v. Woods, 250 F.R.D. 411, 413 (E.D. Mo. 2008)
- LifeScience Techs., LLC v. Mercy Health, No. 4:21-CV-1279 SEP, 2022 WL 2392966, at *2 (E.D. Mo. Apr. 21, 2022)
- Monsanto Co. v. Pioneer Hi-Bred Int'l, Inc., No. 4:12-CV-1090 CEJ, 2014 WL 1211111, at *1 (E.D. Mo. Mar. 24, 2014)
- Miscellaneous Docket Matter No. 1 v. Miscellaneous Docket Matter No. 2, 197 F.3d 922, 926 (8th Cir. 1999)
- Gulf Oil Co. v. Bernard, 452 U.S. 89, 102 n.16 (1981)
- Gen. Dynamics Corp. v. Selb Mfg. Co., 481 F.2d 1204, 1212 (8th Cir. 1973)
- Process Controls Intern., Inc. v. Emerson Process Mgmt., No. 4:10-CV-645 CDP, 2011 WL 1791714, at *8 (E.D. Mo. May 10, 2011)