

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Doe v. Bisignano

Civil Action No. 26-400 (D.D.C. Mar. 6, 2026) · No. 26-400 · Decided March 6, 2026

SUMMARY

The District Court for the District of Columbia grants in part and denies in part John Doe’s motion to proceed under a pseudonym in his Social Security disability-benefits appeal. The court permits pseudonymity because the case involves sensitive medical information and individualized relief, but denies a request to seal the entire administrative record and requires public filings to redact identifying information.

CASE DETAILS

COURT	United States District Court for the District of Columbia
WRITING FOR THE COURT	James E. Boasberg
JURISDICTION	United States District Court for the District of Columbia
DECIDED	March 6, 2026
DOCKET	26-400
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff filed an action challenging a Social Security disability-insurance-benefits decision and moved to proceed under a pseudonym and for a protective order sealing the administrative record. The court granted leave to proceed under a pseudonym subject to further consideration by the randomly assigned district judge, but denied the request to seal the entire administrative record.
STANDARD OF REVIEW	Flexible, fact-driven balancing of the plaintiff’s legitimate interest in anonymity against countervailing interests in disclosure, including the five non-exhaustive factors identified by the D.C. Circuit.
PRECEDENTIAL VALUE	Published district court memorandum opinion; persuasive authority within the District of Columbia but not binding precedent on other courts.
PARTIES	John Doe v. Frank Bisignano, Commissioner, Social Security Administration

TOPICS

civil procedure

administrative law

agency adjudication

judicial review of agency action

ada / disability

PRACTICE AREAS

civil procedure

administrative law

Social Security disability benefits

QUESTIONS PRESENTED

1. Whether Plaintiff should be permitted to proceed under a pseudonym based on the sensitive medical information at issue and the balance of interests in anonymity and public disclosure.
2. Whether the court should order the entire administrative record sealed when filed by the agency.

HOLDINGS

1. Plaintiff may proceed under the pseudonym Doe because the sensitive and highly personal medical information at issue, the individualized relief sought against a government defendant, and the absence of unfairness to the defendant outweigh the factors favoring disclosure.
2. The request to seal the entire administrative record is denied as superfluous and overbroad; Plaintiff may seek narrower or more particularized sealing relief before the assigned district judge.

KEY QUOTATIONS

“A party moving to proceed pseudonymously thus “bears the weighty burden of both demonstrating a concrete need for such secrecy, and identifying the consequences that would likely befall it if forced to proceed in its own name.”” (at 2)

“On balance, although the second and third factors support identifying Plaintiff, the first, fourth, and fifth factors lend sufficient weight to proceeding pseudonymously.” (at 5)

“The Court denies that request, finding it “somewhat superfluous and . . . certainly overbroad” to seal the whole administrative record.” (at 5)

FACTUAL BACKGROUND

Doe, proceeding pro se, challenged the Commissioner's denial or adverse disposition of his Title II disability-insurance-benefits claim, alleging lack of substantial evidence and legal error. The litigation concerns sensitive medical and psychiatric information, including physical symptoms, nerve damage, footdrop, fatigue, and medical and psychiatric evaluations. Doe sought to proceed under a pseudonym and to seal the entire administrative record because it allegedly contained biographical details and persistent identifiers.

PROCEDURAL HISTORY

Doe filed a complaint seeking review of the Commissioner's Title II disability-insurance-benefits decision and moved to proceed under a pseudonym and for a protective order. The court evaluated the pseudonym request under the D.C. Circuit's five-factor balancing framework. It granted pseudonymous treatment with redaction and sealed-identity requirements, denied wholesale sealing of the administrative record, and left further sealing requests to the district judge randomly assigned to the case.

DISPOSITION

other

CASES CITED

- In re Sealed Case, 931 F.3d 92, 96-97 (D.C. Cir. 2019)
- Wash. Legal Found. v. U.S. Sent'g Comm'n, 89 F.3d 897, 899 (D.C. Cir. 1996)
- In re Sealed Case, 971 F.3d 324, 326-29 & n.1 (D.C. Cir. 2020)
- Doe v. Spahn, No. 23-2859, ECF No. 7, Mem. Op. at 3 (D.D.C. Oct. 2, 2023)
- J.K.A. v. United States, No. 23-2273, ECF No. 7, Mem. Op. at 3-4 (D.D.C. Aug. 10, 2023)
- Doe v. Cabrera, 307 F.R.D. 1, 7 (D.D.C. 2014)
- Doe v. Blinken, No. 24-1629, ECF No. 3, Mem. Op. at 5 (D.D.C. June 11, 2024)
- Doe v. ICE, No. 24-617, ECF No. 9, Mem. Op. at 5 (D.D.C. Mar. 8, 2024)
- Doe v. Lieberman, WL 13260569, at *3 (D.D.C. Aug. 5, 2020)