

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF KANSAS

Angela Marie King v. Koch Ag & Energy Solutions, LLC

King v. Koch Ag & Energy Solutions, LLC · No. 25-1017-KHV · Decided March 12, 2026

SUMMARY

The United States District Court for the District of Kansas overruled Koch Ag & Energy Solutions, LLC’s motion to replace and withdraw exhibits provisionally filed under seal and construed the motion as seeking reconsideration of an earlier order denying redaction. The court held that the defendant had not shown clear error or another basis for reconsideration and had not established a sufficient interest to overcome the public’s right of access to salary information in judicial records. The court also overruled as moot the defendant’s motion to maintain the documents under seal pending resolution of the replacement motion.

CASE DETAILS

COURT	United States District Court for the District of Kansas
WRITING FOR THE COURT	Kathryn H. Vratil
JURISDICTION	United States District Court for the District of Kansas
DECIDED	March 12, 2026
DOCKET	25-1017-KHV
DISPOSITION	other
PROCEDURAL POSTURE	The court considered the defendant's motions to replace and withdraw exhibits filed provisionally under seal, to seal the documents pending ruling, and for reconsideration of the court's prior order denying redaction of salary information in exhibits supporting the defendant's summary-judgment motion.
STANDARD OF REVIEW	Reconsideration is appropriate only upon an intervening change in controlling law, newly available evidence that could not previously have been obtained through due diligence, or the need to correct clear error or prevent manifest injustice. A party seeking to seal or redact judicial records must demonstrate that a real and substantial interest favoring nondisclosure outweighs the public interest in access and must support the request with specific facts.
PRECEDENTIAL VALUE	Unpublished district court memorandum and order; generally nonprecedential

TOPICS

motion for reconsideration

summary judgment

civil procedure

PRACTICE AREAS

civil procedure

employment law

QUESTIONS PRESENTED

1. Whether the defendant could withdraw and refile exhibits to avoid the effect of the court's prior order denying redaction of employee salary information.
2. Whether the defendant established grounds for reconsideration of the prior order under District of Kansas Rule 7.3.
3. Whether the defendant demonstrated a sufficient interest to overcome the common-law right of public access to judicial records.
4. Whether the documents should remain sealed pending resolution of the motion to replace and withdraw the exhibits.

HOLDINGS

1. The defendant did not establish an intervening change in controlling law, newly available evidence, clear error, manifest injustice, or another recognized basis for reconsideration.
2. A party seeking to seal or redact judicial records must articulate a real and substantial interest in nondisclosure that outweighs the public interest in access and must support the request with specific, particularized facts.
3. The defendant could not use withdrawal and refiling of the exhibits as a workaround to avoid the court's prior ruling that the salary information should remain available for public view.

KEY QUOTATIONS

“The party seeking to overcome the presumption of public access must show that some significant interest which favors non-disclosure outweighs the public interest in access to court proceedings and documents.” (at 2)

“The Court over rules defendant’s request to withdraw and refile documents as a work around the Court’s prior ruling that the information should not be redacted.” (at 3)

FACTUAL BACKGROUND

Koch Ag & Energy Solutions included employee salary information in exhibits supporting its motion for summary judgment and filed the exhibits provisionally under seal. After the court denied Koch's motion to redact the information, Koch sought to withdraw and refile the exhibits without the salary information, asserting that the information was unnecessary and confidential. The court found that counsel had made a strategic decision to include the information and that the disclosure was not inadvertent.

PROCEDURAL HISTORY

The court previously overruled the defendant's motion to redact portions of exhibits filed in support of its summary-judgment memorandum. The defendant then sought to withdraw and refile the exhibits without salary information and separately sought continued sealing pending resolution of that request. The court construed the first motion in part as a motion for reconsideration and overruled both motions, the second as moot.

DISPOSITION

other

CASES CITED

- Mann v. Boatright, 477 F.3d 1140, 1149 (10th Cir. 2007)
- Nixon v. Warner Communications, 435 U.S. 589, 599 (1978)
- Crystal Grower's Corp. v. Dobbins, 616 F.2d 458, 461 (10th Cir. 1980)
- Colony Insurance Co. v. Burke, 698 F.3d 1222, 1241-42 (10th Cir. 2012)
- Gulf Oil Co. v. Bernard, 452 U.S. 89, 102 n.16 (1981)
- United States v. Bacon, 950 F.3d 1286, 1294 (10th Cir. 2020)
- Servants of Paraclete v. Does, 204 F.3d 1005, 1012 (10th Cir. 2000)
- Matosantos Commercial Corp. v. Applebee's International, Inc., 245 F.3d 1203, 1209 n.2 (10th Cir. 2001)