

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
MISSISSIPPI

Mark S. Buckner, Sr. v. West Tallahatchie School District

No. 3:23-CV-417-DMB-RP (N.D. Miss. Dec. 17, 2025) · No. No. 3:23-CV-417-DMB-RP · Decided December 17, 2025

SUMMARY

The United States District Court for the Northern District of Mississippi addresses West Tallahatchie School District’s motion to restrict an exhibit containing the plaintiff’s full Social Security number. Although the motion did not comply with all applicable Local Rule 79 requirements, the court granted it because the privacy interests outweighed public access concerns and a redacted substitute exhibit had been filed.

CASE DETAILS

COURT	United States District Court for the Northern District of Mississippi
WRITING FOR THE COURT	Debra M. Brown
JURISDICTION	United States District Court for the Northern District of Mississippi
DECIDED	December 17, 2025
DOCKET	No. 3:23-CV-417-DMB-RP
DISPOSITION	other
PROCEDURAL POSTURE	West Tallahatchie School District moved to restrict public access to an exhibit filed with its motion for summary judgment and to permit filing a redacted substitute exhibit.
STANDARD OF REVIEW	The decision whether to restrict or seal judicial records is committed to the sound discretion of the court, which must balance the public's common-law right of access against interests favoring nondisclosure.
PRECEDENTIAL VALUE	Unknown

TOPICS

- civil procedure
- summary judgment

PRACTICE AREAS

- civil procedure
- judicial records and sealing
- privacy and confidentiality

QUESTIONS PRESENTED

1. Whether the court should deny the School District's motion to restrict an exhibit because the motion failed to comply with the procedural requirements of Local Rule 79.
2. Whether the court should nevertheless restrict public access to an exhibit containing Buckner's full Social Security number.

HOLDINGS

1. A court may excuse noncompliance with Local Rule 79 when the filing contains a full Social Security number and the interests favoring nondisclosure clearly outweigh the public's right of access, particularly where a redacted substitute has been filed.
2. Access to the unredacted exhibit containing Buckner's full Social Security number should be restricted from the public and limited to the parties, counsel of record, and the court.

KEY QUOTATIONS

“There is a “‘presumption in favor of the public’s access to judicial records’” and the decision whether to order judicial records sealed (or to restrict access to them) is committed to the sound discretion of the court, which must balance “‘the public’s common law right of access against the interests favoring nondisclosure.’””

“At minimum, all filings should be redacted for consistency with Federal Rule of Civil Procedure 5.2(a), which generally requires parties to partially redact information such as Social Security numbers, financial account numbers, birth dates, and names of minor children.”

FACTUAL BACKGROUND

Exhibit 1 to the School District's motion for summary judgment inadvertently contained Buckner's full Social Security number. The School District sought to restrict public access to the exhibit and filed a redacted substitute version. The court determined that nondisclosure of the full Social Security number outweighed the public's right of access.

PROCEDURAL HISTORY

The School District filed a motion seeking to restrict Exhibit 1 to its summary-judgment motion because the exhibit inadvertently disclosed Mark S. Buckner, Sr.'s full Social Security number. The court found that the motion did not comply with most of Local Rule 79's procedural requirements, but excused the noncompliance because the exhibit contained highly sensitive personal information and a redacted version had been filed. The court granted the motion and directed the Clerk to restrict access to the unredacted exhibit to the parties, counsel of record, and the court.

DISPOSITION

other

CASES CITED

- Binh Hoa Le v. Exeter Finance Corp., 990 F.3d 410, 419 (5th Cir. 2021)
- S.E.C. v. Van Waeyenberghe, 990 F.2d 845, 849 (5th Cir. 1993)
- United States v. Sealed Search Warrants, 868 F.3d 385, 393 (5th Cir. 2017)
- Sealed Appellant v. Sealed Appellee, No. 22-50707, 2024 WL 980494, at *2 (5th Cir. Mar. 7, 2024)

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