

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
INDIANA, INDIANAPOLIS DIVISION

Jamilah McCray v. Target Corporation

No. 1:25-cv-01063-JRS-TAB (S.D. Ind. Jan. 22, 2026) · No. 1:25-cv-01063-JRS-TAB · Decided January 22, 2026

SUMMARY

The United States District Court for the Southern District of Indiana rules on Plaintiff Jamilah McCray's motion for a protective order concerning discovery of her private social media content. The court denies the motion as to subject matter but grants it in part by limiting responsive production to content from January 1, 2024, through the present.

CASE DETAILS

COURT	United States District Court for the Southern District of Indiana, Indianapolis Division
WRITING FOR THE COURT	Tim A. Baker
JURISDICTION	United States District Court for the Southern District of Indiana
DECIDED	January 22, 2026
DOCKET	1:25-cv-01063-JRS-TAB
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved for a protective order limiting the subject matter and temporal scope of Defendant's requests for production and interrogatories concerning Plaintiff's private social media content.
STANDARD OF REVIEW	Discovery requests are evaluated under Federal Rule of Civil Procedure 26(b)(1), which permits discovery of nonprivileged matter relevant to a claim or defense and proportional to the needs of the case. Protective-order limits are assessed for relevance, proportionality, and undue burden.
PRECEDENTIAL VALUE	unpublished district-court discovery order; persuasive value only
PARTIES	Jamilah McCray v. Target Corporation

TOPICS

- discovery dispute
- civil procedure
- employment discrimination
- title vii
- hostile work environment

PRACTICE AREAS

civil procedure

employment law

employment discrimination

civil rights

QUESTIONS PRESENTED

1. Whether Defendant's requests for social-media content concerning Target, Plaintiff's religious or spiritual beliefs, and the claims or defenses in the case sought information relevant and proportional to the needs of the case.
2. Whether the social-media discovery requests were temporally overbroad and should be limited to content from January 1, 2024, through the present.

HOLDINGS

1. The requests were relevant and proportional to the needs of the case to the extent they sought content connecting Target with Plaintiff's religious or spiritual beliefs, her alleged workplace harassment, or the claims and defenses in the litigation. The motion for a protective order was denied as to the subject matter of Interrogatory No. 7 and Request No. 20.
2. The motion for a protective order was granted in part to clarify that Plaintiff need produce responsive social-media content only from January 1, 2024, through the present.

KEY QUOTATIONS

"Private social media content is not immune from discovery." (Discussion)

"For the foregoing reasons, Plaintiff's motion for a protective order [Filing No. 46] is granted in part and denied in part." (Conclusion)

FACTUAL BACKGROUND

Jamilah McCray sued her former employer, Target Corporation, alleging race and religious discrimination, retaliation, hostile work environment, and wrongful termination under Title VII, as well as wage-related misconduct. Target sought social-media information concerning Target, its employees, McCray's claims and damages, and her job-search efforts. McCray objected that the requests were overbroad because they reached spiritual or religious content and extended over four years, although her employment began in January 2024.

PROCEDURAL HISTORY

Plaintiff brought Title VII discrimination, retaliation, hostile-work-environment, and wrongful-termination claims, along with wage-related claims, against her former employer. After an earlier discovery motion was denied for failure to confer as required by Local Rule 37-1, the parties participated in a discovery status conference at which the Court addressed social-media discovery. Plaintiff then filed the present motion for a protective order concerning Interrogatory No. 7 and Request No. 20. The Court denied the motion as to subject matter but granted it in part to clarify the relevant temporal period.

DISPOSITION

other

CASES CITED

- In re Cook Medical, Inc., No. 1:14-ml-2570-RLY-TAB, 2017 WL 4099209, at *5 (S.D. Ind. Sept. 15, 2017)
- Johnson v. Advocate Health & Hospitals Corp., 892 F.3d 887, 900 (7th Cir. 2018)
- Appler v. Mead Johnson & Co., LLC, No. 3:14-CV-166-RLY-WGH, 2015 WL 5615038, at *3 (S.D. Ind. Sept. 24, 2015)
- Pearle Vision, Inc. v. Romm, 541 F.3d 751, 758 (7th Cir. 2008)
- Allen v. PPE, 543 F. Supp. 3d 91, 96 (D. Md. 2021)

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