

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
PENNSYLVANIA

Eva Anderson v. Kenneth L. Baritz, et al.

Anderson · No. No. 24-2095 · Decided February 13, 2026

SUMMARY

The United States District Court for the Eastern District of Pennsylvania denied Eva Anderson’s motion to stay a \$5,316 sanctions order pending appellate review. The court held that Anderson was unlikely to succeed because she violated a deposition order without substantial justification, and that the monetary sanction did not constitute irreparable harm. The court also concluded that the public interest strongly favored enforcing court orders and promoting the prompt administration of justice.

CASE DETAILS

COURT	United States District Court for the Eastern District of Pennsylvania
WRITING FOR THE COURT	Gerald J. Pappert
JURISDICTION	United States District Court for the Eastern District of Pennsylvania
DECIDED	February 13, 2026
DOCKET	No. 24-2095
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved to stay a monetary sanctions order under Federal Rule of Civil Procedure 37(b)(2)(C) pending appellate review after final judgment. The district court denied the motion.
STANDARD OF REVIEW	The court applied the four-factor standard governing a stay: likelihood of success on the merits, irreparable harm, harm to the opposing parties, and the public interest.
PRECEDENTIAL VALUE	unpublished
PARTIES	Eva Anderson v. Kenneth L. Baritz, Esquire, Baritz Law Associates LLC

TOPICS

- sanctions
- discovery dispute
- civil procedure
- appellate procedure
- equitable relief

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the district court should stay the Rule 37(b)(2)(C) monetary sanctions order pending appellate review.
2. Whether Anderson was likely to succeed on her challenges to the sanctions order, including her arguments that Rule 37(b)(2)(C) requires willfulness or bad faith, that her disagreement with the deposition format and her atrial fibrillation substantially justified her noncompliance, and that later compliance made the sanctions unjust.
3. Whether immediate payment of the \$5,316.00 sanction would cause irreparable harm.

HOLDINGS

1. A district court has inherent power to stay a Rule 37(b)(2)(C) sanctions order pending appellate review.
2. Rule 37(b)(2)(C) does not require a finding of willfulness, bad faith, or intentional wrongdoing before the court may award reasonable expenses caused by a party's failure to obey a discovery order.
3. Anderson was not substantially justified in disobeying the deposition order merely because she disagreed with the ordered in-person deposition format or because she asserted an inadequately supported medical condition.
4. Later attendance at a different court-ordered deposition did not eliminate the violation of the earlier order or make the Rule 37(b)(2)(C) sanctions award unjust.
5. Anderson did not establish irreparable harm because the monetary sanction imposed financial injury that could be recovered after a successful appeal and did not prevent her from continuing to litigate.

KEY QUOTATIONS

“The plain text of Rule 37(b)(2)(C) imposes no willful or bad faith limitation.” (at 1)

“A plaintiff is not substantially justified in defying a court order simply because she disagrees with it.” (at 2)

“The public interest in promoting the fair and prompt administration of justice and guarding judicial authority weighs heavily in favor of declining Anderson’s motion.” (at 3)

FACTUAL BACKGROUND

Anderson refused to attend a November 7, 2025 deposition required by court order, despite the court's denial of two requests for a remote deposition. She later attended a court-ordered deposition on December 19, but the court found that this did not cure her violation of the earlier order. The court had ordered her to pay \$5,316.00 in reasonable expenses caused by her failure to attend.

PROCEDURAL HISTORY

Anderson failed to attend a court-ordered deposition on November 7, 2025. The court granted defendants' sanctions motion in part and ordered Anderson to pay \$5,316.00 in reasonable expenses. Anderson later attended

a deposition on December 19, 2025, but moved to stay the sanctions order pending appellate review; the court denied the stay.

DISPOSITION

other

CASES CITED

- United States v. Breyer, 41 F.3d 884, 893 (3d Cir. 1994)
- Nken v. Holder, 556 U.S. 418, 426 (2009)
- Anderson v. Baritz, No. 24-2095, 2025 WL 3722004, at *2, *4 (E.D. Pa. Dec. 23, 2025)
- Donofrio v. Ikea US Retail, LLC, No. 18-599, 2024 WL 1998094, at *24 (E.D. Pa. May 6, 2024)
- In re Atomica Design Grp., Inc., 591 B.R. 217, 233 (Bankr. E.D. Pa. 2018)
- Miller v. Thompson-Walk, No. 15-1605, 2019 WL 2150660, at *9 (W.D. Pa. May 17, 2019)
- In re Anderson, No. 25-3514, 2026 WL 184241, at *2 (3d Cir. Jan. 23, 2026) (per curiam)
- Morton v. Beyer, 822 F.2d 364, 372 (3d Cir. 1987)
- E. Maico Distribs., Inc. v. Maico-Fahrzeugfabrik, G.m.b.H., 658 F.2d 944, 948 (3d Cir. 1981)
- Instant Air Freight Co. v. C.F. Air Freight, Inc., 882 F.2d 797, 801 (3d Cir. 1989)
- Mulay Plastics, Inc. v. Grand Trunk W. R.R. Co., 742 F.2d 369, 370 (7th Cir. 1984)
- M.A. Mortenson Co. v. United States, 877 F.2d 50, 52 (Fed. Cir. 1989) (order)