

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Mou Seng See v. Rivas, et al.

See v. Rivas · No. 1:23-cv-01354-KES-BAM (PC) · Decided July 15, 2025

SUMMARY

The United States District Court for the Eastern District of California grants Defendants’ motion to file video evidence under seal in a prisoner civil-rights action. The Court finds compelling justifications based on institutional security concerns and orders the videos to remain sealed until further order, subject to supervised viewing by Plaintiff under specified conditions.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Barbara A. McAuliffe
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	July 15, 2025
DOCKET	1:23-cv-01354-KES-BAM (PC)
DISPOSITION	other
PROCEDURAL POSTURE	Defendants moved to file video evidence supporting their pending motion for summary judgment under seal. The court granted the sealing motion.
STANDARD OF REVIEW	The court assessed whether compelling justification existed to overcome the public-access presumption applicable to court filings and conducted an in camera review of the videos.
PRECEDENTIAL VALUE	Unknown

TOPICS

- civil procedure
- prisoners rights
- civil rights

PRACTICE AREAS

- Civil procedure
- Prisoner civil rights
- Sealing of court records

QUESTIONS PRESENTED

1. Whether defendants established compelling justification to file the video evidence under seal despite the presumption that court filings are public.
2. Whether sealing the videos would prejudice plaintiff when plaintiff could view them under specified supervisory conditions.

HOLDINGS

1. Defendants established compelling justification for sealing the videos because public disclosure could threaten the safety and security of correctional institutions, staff, or inmates.
2. The videos could remain sealed without prejudicing plaintiff because he had previously viewed related footage and could obtain supervised further viewing without copying or disclosure to other inmates.

KEY QUOTATIONS

“Filings in cases such as this are a matter of public record absent compelling justification.” (at 2)

“The videos shall remain under seal until ordered unsealed by the Court.” (at 2)

FACTUAL BACKGROUND

The videos consisted of footage from the E-Facility kitchen at SATF and body-worn-camera footage from three custody defendants. The California Department of Corrections and Rehabilitation maintained the videos as confidential, and defendants asserted that disclosure of security-camera viewpoints, camera limitations, and staff administrative or investigative practices could threaten institutional, staff, and inmate safety. Plaintiff had previously viewed related footage during discovery and could view the videos again under supervision without making copies.

PROCEDURAL HISTORY

Plaintiff, a state prisoner proceeding pro se and in forma pauperis, brought a 42 U.S.C. § 1983 action alleging deliberate indifference to medical needs in violation of the Eighth Amendment. Defendants filed a motion for summary judgment and a related motion to file kitchen and body-worn-camera videos under seal. Plaintiff opposed summary judgment but did not oppose the sealing motion, which the court deemed submitted under Local Rule 230(l).

DISPOSITION

other

CASES CITED

- United States v. Stoterau, 524 F.3d 988, 1012 (9th Cir. 2008)