

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Carbon Autonomous Robotic Systems Inc. v. Laudando & Associates
LLC

Carbon Autonomous Robotic Systems · No. 2:24-cv-03012-DAD-JDP · Decided June 13, 2025

SUMMARY

The United States District Court for the Eastern District of California grants the parties’ renewed requests to seal and redact materials filed in connection with a motion for a preliminary injunction. Applying the Ninth Circuit’s compelling-reasons standard, the court finds that the requested redactions protect confidential business, financial, technical, pricing, sales, and customer information and are narrowly tailored. The court authorizes the redactions and orders the parties to file unredacted versions under seal within ten days.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Dale A. Drozd
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	June 13, 2025
DOCKET	2:24-cv-03012-DAD-JDP
DISPOSITION	other
PROCEDURAL POSTURE	The court considered renewed requests by both parties to seal and redact documents filed in connection with plaintiff's motion for a preliminary injunction.
STANDARD OF REVIEW	Requests to seal judicial records connected to a motion more than tangentially related to the merits are evaluated under the compelling-reasons standard. The party seeking sealing bears the burden of establishing compelling reasons and must narrowly tailor the sealing or redactions.
PRECEDENTIAL VALUE	unpublished district court order; nonprecedential

TOPICS

- civil procedure
- injunctions
- patent law
- commercial litigation

PRACTICE AREAS

civil procedure

patent litigation

sealing and access to judicial records

commercial litigation

QUESTIONS PRESENTED

1. Whether the documents filed in connection with Carbon's motion for a preliminary injunction should be evaluated under the compelling-reasons standard for sealing judicial records.
2. Whether plaintiff established compelling reasons and narrowly tailored redactions sufficient to seal portions of its motion, declarations, and exhibits.
3. Whether defendant established compelling reasons and narrowly tailored redactions sufficient to maintain redactions in its opposition and related materials.

HOLDINGS

1. The compelling-reasons standard applies to requests to seal or redact documents filed in connection with a preliminary-injunction motion when the motion is more than tangentially related to the merits of the case.
2. Plaintiff established compelling reasons to seal and redact portions of its preliminary-injunction filings and narrowly tailored the redactions to confidential information.
3. Defendant established compelling reasons to maintain redactions concerning confidential business, financial, technical, and plaintiff-related information, and its redactions were narrowly tailored.

KEY QUOTATIONS

“Historically, courts have recognized a ‘general right to inspect and copy public records and documents, including judicial records and documents.’” (at 1-2)

“The compelling reasons standard is invoked even if the dispositive motion, or its attachments, were previously filed under seal or protective order.” (at 3)

“Therefore, the requests to seal and redact will be evaluated under the “compelling reason” standard.” (at 3)

FACTUAL BACKGROUND

The parties submitted documents supporting and opposing Carbon's motion for a preliminary injunction in a patent-infringement action. The documents contained confidential pricing, financial, sales, customer, business, and technical information concerning the parties and their products. Both parties filed redacted versions publicly before obtaining leave to do so, and each party represented that the opposing party did not oppose its renewed request.

PROCEDURAL HISTORY

The court had previously denied the parties' initial sealing and redaction requests for failure to articulate compelling reasons and directed them either to renew the requests or file unredacted documents publicly. Plaintiff renewed its requests on May 15, 2025, and defendant renewed its request on May 16, 2025. The court

granted both renewed requests and authorized specified redactions, while directing the parties to file unredacted versions under seal within ten days.

DISPOSITION

other

CASES CITED

- San Jose Mercury News, Inc. v. U.S. Dist. Court, 187 F.3d 1096, 1103 (9th Cir. 1999)
- Kamakana v. City & County of Honolulu, 447 F.3d 1172, 1178-80 (9th Cir. 2006)
- Nixon v. Warner Communications, Inc., 435 U.S. 589, 597 & n.7, 598 (1978)
- Pintos v. Pacific Creditors Ass'n, 605 F.3d 665, 677-78 (9th Cir. 2010)
- Foltz v. State Farm Mutual Automobile Insurance Co., 331 F.3d 1122, 1135-36 (9th Cir. 2003)
- Ctr. for Auto Safety v. Chrysler Grp., LLC, 809 F.3d 1092, 1101-02 (9th Cir. 2016)
- Apex.AI, Inc. v. Langmead, No. 5:23-cv-02230-BLF, 2023 WL 4157629, at *2 (N.D. Cal. June 23, 2023)
- Stiles v. Wal-Mart Stores, Inc., No. 2:14-cv-02234-KJM-DMC, 2021 WL 1212645, at *1-2 (E.D. Cal. Mar. 31, 2021)
- Apple Inc. v. Samsung Elecs. Co., 727 F.3d 1214, 1225 (Fed. Cir. 2013)
- Virun, Inc. v. Cymbiotika, LLC, No. 8:22-cv-00325-SSS-DFM, 2022 WL 17401698, at *3 (C.D. Cal. Aug. 19, 2022)
- Fate Therapeutics, Inc. v. Shoreline Biosciences, Inc., No. 22-cv-00676-H-MSB, 2023 WL 6376095, at *1 (S.D. Cal. Feb. 16, 2023)
- Edtronic, Inc. v. Axonics Modulation Techs., Inc., No. 8:19-cv-02115-DOC-JDE, 2023 WL 6813743, at *2
- Intel Corp. v. Tela Innovations, Inc., No. 3:18-cv-02848-WHO, 2021 WL 783560, at *13-14 (N.D. Cal. Mar. 1, 2021)
- Virtru Corp. v. Microsoft Corp., No. 2:23-cv-00872-JNW, 2025 WL 1383793, at *5 (W.D. Wash. May 12, 2025)
- Johnstech Int'l Corp. v. JF Microtechnology SDN BHD, No. 14-cv-02864-JD, 2016 WL 4091388, at *2 (N.D. Cal. Aug. 2, 2016)