

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
INDIANA, SOUTH BEND DIVISION

Kasturi Haldar v. University of Notre Dame du Lac, et al.

Haldar · No. 3:24-CV-836-CCB-SJF · Decided January 27, 2026

SUMMARY

The court interprets provisions of a stipulated protective order in a Title VII action brought by a tenured University of Notre Dame professor. It holds that the provisions do not broadly protect entire employment- or grievance-related documents, but may protect portions containing the identity and personal information of nonparty participants. The court favors targeted redactions over complete sealing, while declining to order redacted versions of certain documents based on the law of the case doctrine.

CASE DETAILS

COURT	United States District Court for the Northern District of Indiana, South Bend Division
WRITING FOR THE COURT	Scott J. Frankel
JURISDICTION	United States District Court for the Northern District of Indiana, South Bend Division
DECIDED	January 27, 2026
DOCKET	3:24-CV-836-CCB-SJF
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved for interpretation of a stipulated protective order, redesignation of documents, and leave to file public versions of sealed documents. The court granted the motion in part, allowing redacted versions of two documents and retaining specified documents under seal.
STANDARD OF REVIEW	Interpretation of the stipulated protective order according to ordinary contract-interpretation principles; reconsideration of prior interlocutory sealing orders under Federal Rule of Civil Procedure 54(b) and the discretionary law-of-the-case doctrine.
PRECEDENTIAL VALUE	District court opinion; precedential status not designated in the source.
PARTIES	Kasturi Haldar v. University of Notre Dame du Lac, et al.

TOPICS

civil procedure title vii employment discrimination contracts

PRACTICE AREAS

civil procedure employment law employment discrimination title vii

QUESTIONS PRESENTED

1. Whether Sections II(A)(3) and II(A)(5) of the stipulated protective order required the disputed documents to remain confidential or under seal.
2. Whether Section II(A)(3) protects documents merely mentioning nonparties or instead only personnel or employment records belonging to nonparties.
3. Whether Section II(A)(5) protects entire documents or only portions concerning the identity and personal information of specified nonparties.
4. Whether faculty grievance materials and the Office of Institutional Equity investigation report should be redacted rather than sealed in their entirety.
5. Whether the court should reconsider earlier interlocutory sealing orders under Rule 54(b) and the law-of-the-case doctrine.
6. Whether the SAM.gov application satisfied the protective order's confidentiality requirements and whether defendants established good cause for continued sealing.

HOLDINGS

1. Section II(A)(3) protects personnel or employment records belonging to a person who is not a party; documents concerning Halder's own employment situation do not become nonparty personnel records merely because they mention nonparties.
2. Section II(A)(5) protects only portions of documents concerning the identity and personal information of specified nonparties, not entire documents in the listed categories.
3. The protective order supported targeted redaction of nonparty identifying and personal information, but not complete sealing of the faculty grievance materials or OIE investigation report solely because those documents arose from confidential processes.
4. Defendants failed to establish that the SAM.gov application was maintained as confidential or that good cause supported sealing it in full; only qualifying nonparty identifying information could be protected under the protective order.
5. The court declined to reconsider its earlier interlocutory sealing orders because the parties did not show an appropriate basis under Rule 54(b), and the law-of-the-case doctrine supported retaining documents that had materially informed prior decisions.

KEY QUOTATIONS

“If the parties intended to make entire categories of documents confidential, they would not have included this restrictive modifying phrase in the first place.” (Section III.A)

“Therefore, targeted redaction rather than a complete sealing of faculty grievance documents is appropriate given the privacy interests of non-party complainant.” (Section III.B)

“Plaintiff’s Motion for Interpretation of Protective Order, to Redesignate Documents, and to File Public Versions of Sealed Documents is GRANTED in PART.” (Section IV)

FACTUAL BACKGROUND

Kasturi Halder is a tenured University of Notre Dame professor who brought Title VII claims concerning restrictions imposed on her work, the closing of her laboratory, and increased teaching responsibilities. The parties filed various faculty grievance materials, an Office of Institutional Equity investigation report, a SAM.gov application, and employment-related correspondence under seal or subject to confidentiality designations. Halder argued that the protective order did not justify sealing the documents in their entirety and sought permission to file public or redacted versions.

PROCEDURAL HISTORY

Halder brought Title VII claims alleging discrimination based on race, national origin, gender, and age. During the case, the court entered a protective order and previously ordered various documents sealed in connection with Halder's requests for emergency injunctive relief and reconsideration. Halder later sought clarification of the protective order and unsealing of documents; after briefing, the district court ruled that the motion should be granted in part but declined to disturb several earlier sealing orders under the law-of-the-case doctrine.

DISPOSITION

other

CASES CITED

- *Foggia v. Universal Steel Am., Inc.*, 2005 WL 8170136, at *1 (N.D. Ind. Mar. 18, 2005)
- *Union Oil Co. of Cal. v. Leavell*, 220 F.3d 562, 568 (7th Cir. 2000)
- *In re Sulfuric Acid Antitrust Litigation*, 235 F.R.D. 407, 418-19 (N.D. Ill. 2006)
- *Beanstalk Grp., Inc. v. AM Gen. Corp.*, 283 F.3d 856, 859 (7th Cir. 2002)
- *Davis v. G.N. Mortg. Corp.*, 396 F.3d 869, 878 (7th Cir. 2005)
- *Mem'l Hosp. for McHenry County v. Shadur*, 664 F.2d 1058, 1061 & n.3 (7th Cir. 1981)
- *Grove Fresh Distribs., Inc. v. John Labatt Ltd.*, 888 F. Supp. 1427, 1438 (N.D. Ill. 1995)
- *United States v. Greyhound Corp.*, 508 F.2d 529, 532-33 (7th Cir. 1974)
- *Baxter Int'l, Inc. v. Abbott Laboratories*, 297 F.3d 544, 545-46 (7th Cir. 2002)
- *Seattle Times Co. v. Rhinehart*, 467 U.S. 20 (1984)
- *Grove Fresh Distribs., Inc. v. Everfresh Juice Co.*, 24 F.3d 893 (7th Cir. 1994)
- *In re Continental Illinois Sec. Litig.*, 732 F.2d 1302 (7th Cir. 1984)

- Gadelhak v. AT&T Servs., Inc., 950 F.3d 458, 464, 468 (7th Cir. 2020)
- City of Fort Wayne v. Consol. Elec. Distribs., Inc., 998 N.E.2d 733, 737 (Ind. Ct. App. 2013)
- Chase Indus., Inc. v. The P. M. Co., 806 F. Supp. 1381, 1386 (N.D. Ill. 1992)
- EEOC v. Univ. of Notre Dame, 715 F.2d 331, 336, 338 (7th Cir. 1983)
- Univ. of Pa. v. EEOC, 493 U.S. 182, 192-95 (1990)
- Schneider v. Northwestern Univ., 151 F.R.D. 319, 323 (N.D. Ill. 1993)
- Mattice v. Memorial Hosp. of South Bend, 203 F.R.D. 381, 386-87 (N.D. Ind. 2001)
- McClendon v. Ill. Dep't of Transp., 64 F. Supp. 3d 1163, 1169 (N.D. Ill. 2014)
- State Journal-Register v. Univ. of Ill., 994 N.E.2d 710, 714, 719 (Ill. App. Ct. 2013)
- Citizens First Nat. Bank of Princeton v. Cincinnati Ins. Co., 178 F.3d 943, 945 (7th Cir. 1999)
- Herron v. Tears of Eden, 2024 WL 6883862, at *2 n.1 (S.D. Ind. Feb. 6, 2024)
- Peterson v. Linder, 765 F.2d 698, 704 (7th Cir. 1985)
- Galvan v. Norberg, 678 F.3d 581, 586-87 (7th Cir. 2012)
- Marconi Wireless Tel. Co. v. United States, 320 U.S. 1, 47 (1943)
- Bank of Waunakee v. Rochester Cheese Sales, Inc., 906 F.2d 1185, 1191 (7th Cir. 1990)
- Arizona v. California, 460 U.S. 605, 618 (1983)
- Pepper v. United States, 562 U.S. 476, 506 (2011)
- Gilbert v. Ill. State Bd. of Educ., 591 F.3d 896, 902 (7th Cir. 2010)
- Bowles v. Wilke, 175 F.2d 35, 37 (7th Cir. 1949)
- HK Systems, Inc. v. Eaton Corp., 553 F.3d 1086, 1089 (7th Cir. 2009)
- Avitia v. Metropolitan Club of Chicago, Inc., 49 F.3d 1219, 1227 (7th Cir. 1995)