

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF KANSAS

Angela Marie King v. Koch Ag & Energy Solutions, LLC

King · No. No. 25-1017-KHV · Decided March 9, 2026

SUMMARY

The United States District Court for the District of Kansas overrules Koch Ag & Energy Solutions, LLC's motion to redact compensation information from exhibits filed in support of its summary-judgment memorandum. The Court holds that the defendant did not demonstrate a real and substantial interest sufficient to overcome the public's common-law right of access to judicial records and directs the Clerk to unseal the provisionally sealed documents.

CASE DETAILS

COURT	United States District Court for the District of Kansas
WRITING FOR THE COURT	Kathryn H. Vratil
JURISDICTION	United States District Court for the District of Kansas
DECIDED	March 9, 2026
DOCKET	No. 25-1017-KHV
DISPOSITION	other
PROCEDURAL POSTURE	Defendant moved to redact portions of four exhibits containing non-party employee compensation information that had been filed in support of defendant's memorandum for summary judgment. The plaintiff opposed the motion.
STANDARD OF REVIEW	The court applied the common-law presumption of public access to judicial records and required the party seeking nondisclosure to articulate a real and substantial interest that outweighs the public interest in access.
PRECEDENTIAL VALUE	District court memorandum and order; precedential status is not stated in the opinion.

TOPICS

- civil procedure
- employment discrimination

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the defendant established a sufficiently significant, real, and substantial interest in preventing public access to employee compensation information filed as part of the materials supporting summary judgment.
2. Whether the asserted employee privacy, proprietary, and competitive interests outweighed the public's common-law right of access to judicial records.

HOLDINGS

1. A party seeking to redact or seal judicial records must articulate a real and substantial interest favoring nondisclosure that outweighs the public interest in access to records informing the court's decision-making process.
2. The defendant did not meet its heavy burden to show that the asserted privacy, proprietary, and competitive interests outweighed the public interest in access to the compensation information, so the motion to redact was overruled and the documents were ordered unsealed.

KEY QUOTATIONS

“The party seeking to overcome the presumption of public access must show that some significant interest which favors non-disclosure outweighs the public interest in access to court proceedings and documents.” (-1 to -2)

“On this record, defendant has not met the heavy burden to articulate a real and substantial interest which justifies depriving the public access to the records which inform the Court’s decision-making process.” (-3)

“The Court directs the Clerk to unseal the following provisionally sealed documents: Provisionally Sealed Documents (Doc. #67), Exhibit B (Doc. #67-1), Exhibit C (Doc. #67-2), Exhibit M (Doc. #67- 3) and Exhibit N (Doc. #67-4), all filed February 13, 2026.” (-3)

FACTUAL BACKGROUND

The challenged exhibits contained compensation information concerning current and former Koch Ag & Energy Solutions employees, including base pay, salary increases, base-salary rate changes, and variable-compensation awards. The plaintiff asserted that salary information concerning similarly situated colleagues and comparators was central to her discrimination and Equal Pay Act claims. The defendant argued that disclosure could harm employees' compensation negotiations and permit competitors to recruit employees, but the court found those harms speculative.

PROCEDURAL HISTORY

The exhibits were provisionally sealed while defendant sought redaction. The district court denied the motion and directed the clerk to unseal the identified documents and exhibits.

DISPOSITION

CASES CITED

- Mann v. Boatright, 477 F.3d 1140, 1149 (10th Cir. 2007)
- Nixon v. Warner Communications, 435 U.S. 589, 599 (1978)
- Crystal Grower's Corp. v. Dobbins, 616 F.2d 458, 461 (10th Cir. 1980)
- Colony Insurance Co. v. Burke, 698 F.3d 1222, 1241 (10th Cir. 2012)
- Gulf Oil Co. v. Bernard, 452 U.S. 89, 102 n.16 (1981)
- United States v. Bacon, 950 F.3d 1286, 1294 (10th Cir. 2020)
- United States v. Smith, No. 12-20066-31-KHV, 2016 WL 1312518, at *1 (D. Kan. Apr. 4, 2016)

OPINION

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF KANSAS ANGELA MARIE KING,)) Plaintiff,)) CIVIL ACTION v.)) No. 25-1017-KHV) KOCH AG & ENERGY) SOLUTIONS, LLC,) Defendant.)

_____) MEMORANDUM AND ORDER This matter is before the Court on Defendant Koch Ag & Energy Solutions, LLC's Motion To Redact Certain Portions Of Exhibits Filed In Support Of Its Memorandum For Summary Judgment (Doc. #69) filed February 18, 2026.

Defendant seeks to redact portions of four exhibits, which contain non-party compensation information (Doc. #67). Plaintiff opposes defendant's motion. For reasons stated below, the Court overrules defendant's motion. Federal courts have long recognized a common-law right of access to judicial records. Mann v. Boatright, 477 F.3d 1140, 1149 (10th Cir. 2007).

This right stems from the fundamental public interest in understanding disputes that are presented to a public forum for resolution. See Nixon v. Warner Commc'ns, 435 U.S. 589, 599 (1978); Crystal Grower's Corp. v. Dobbins, 616 F.2d 458, 461 (10th Cir. 1980).

The party seeking to overcome the presumption of public access must show that some significant interest which favors non-disclosure outweighs the public interest in access to court proceedings and documents. Colony Ins. Co. v. Burke, 698 F.3d 1222, 1241 (10th Cir. 2012).

To do so, the party must articulate a real and substantial interest that justifies depriving the public of access to the records that inform the Court's decision-making process. Id.; see Gulf Oil Co. v. Bernard, 452 U.S. 89, 102 n.16 (1981) (moving party must submit particular and specific facts, not merely "stereotyped and conclusory statements").

The Court must rely on specific, rather than general, information when deciding to seal. See United States v. Bacon, 950 F.3d 1286, 1294 (10th Cir. 2020). Defendant seeks to redact portions

of four exhibits that contain confidential compensation information related to current and former KAES employees, including base pay amounts, increases in base salary, rate changes in base salary and awards of variable compensation.

Defendant Koch Ag & Energy Solutions, LLC's Memorandum In Support Of Its Motion To Redact Certain Portions Of Exhibits Filed In Support Of Its Memorandum For Summary Judgment (Doc. #70) at 3. Plaintiff notes that the salary information of her similarly situated colleagues and comparators are central to her discrimination and Equal Pay Act claims. Defendant argues that the current and former employees have a "strong personal privacy interest" in the compensation information contained in the exhibits.

Id. Defendant argues that disclosure might harm its employees' ability to negotiate compensation with a competing company. Defendant KAES's Reply in Support of Its Motion to Redact Certain Portions of Exhibits (Doc. #72) at 2–3. Any such harm is speculative.

In any event, the potential harm to employees is minimal and does not outweigh the public's "paramount" interest in access to judicial records. See *United States v. Smith*, No. 12-20066-31-KHV, 2016 WL 1312518, at *1 (D. Kan. April 4, 2016). Defendant argues that it has proprietary and competitive interests in the salary information of its employees and that competitors could use such information to unfairly recruit its employees.

Defendant has not shown that competitors cannot otherwise obtain salary and compensation data about its employees. The Court recognizes that the public and competitors may have easier access -2- to this information if the exhibits are not redacted. Even so, based on the present record, defendant's fear that a competitor could exploit such information is speculative.

On balance, defendant has not shown how its interest in making it more difficult for competitors to access the compensation information outweighs the public interest in access to the materials that form part of the basis of this lawsuit. See *Colony Ins.*, 698 F.3d at 1242.

On this record, defendant has not met the heavy burden to articulate a real and substantial interest which justifies depriving the public access to the records which inform the Court's decision-making process. See *id.* Therefore, the Court overrules defendant's motion. IT IS THEREFORE ORDERED that Defendant Koch Ag & Energy Solutions, LLC's Motion To Redact Certain Portions Of Exhibits Filed In Support Of Its Memorandum For Summary Judgment (Doc. #69) filed February 18, 2026 is OVERRULED.

The Court directs the Clerk to unseal the following provisionally sealed documents: Provisionally Sealed Documents (Doc. #67), Exhibit B (Doc. #67-1), Exhibit C (Doc. #67-2), Exhibit M (Doc. #67- 3) and Exhibit N (Doc. #67-4), all filed February 13, 2026. Dated this 9th day of March, 2026 at Kansas City, Kansas. s/ Kathryn H. Vratil KATHRYN H. VRATIL United States District Judge -3-

