

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

other

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)

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