

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
CALIFORNIA, SAN JOSE DIVISION

Saechao v. Western Dental Services, Inc.

Saechao · No. 24-cv-01681-BLF (VKD) · Decided July 16, 2025

SUMMARY

The United States District Court for the Northern District of California resolves a discovery dispute in an ADA, Rehabilitation Act, and ACA case brought by a deaf plaintiff against Western Dental Services, Inc. The Court orders additional production concerning records relating to the plaintiff, interpreter services, employee training, federal financial assistance, and compliance assurances, and directs the parties to confer regarding complaints by other patients. The Court also permits a limited further Rule 30(b)(6) deposition and sets production and status-report deadlines.

CASE DETAILS

COURT	United States District Court for the Northern District of California, San Jose Division
WRITING FOR THE COURT	Virginia K. DeMarchi
JURISDICTION	United States District Court for the Northern District of California, San Jose Division
DECIDED	July 16, 2025
DOCKET	24-cv-01681-BLF (VKD)
DISPOSITION	other
PROCEDURAL POSTURE	The parties submitted a discovery dispute concerning Western Dental's allegedly incomplete responses to requests for production. The court resolved the dispute without oral argument under Civil Local Rule 7-1(b).
STANDARD OF REVIEW	Discovery relevance and proportionality under Federal Rule of Civil Procedure 26(b)(1), together with the responding party's production obligations under Rule 34(b)(2)(E).
PRECEDENTIAL VALUE	unpublished district court order; nonprecedential
PARTIES	Sou Saechao v. Western Dental Services, Inc.

TOPICS

discovery dispute

civil procedure

ada / disability

reasonable accommodation

health law

PRACTICE AREAS

civil procedure

disability discrimination

discovery

health law

QUESTIONS PRESENTED

1. Whether Western Dental had complied with its obligation to produce documents responsive to RFP 1 concerning records relating to Saechao.
2. Whether Western Dental had to produce additional employee training materials and training-completion records responsive to RFP 5.
3. Whether Western Dental had to produce vendor contracts and office-specific records concerning auxiliary aids and interpreter services responsive to RFP 3(e), including records obtainable from vendors within Western Dental's control.
4. Whether Western Dental had to produce documents concerning federal financial assistance and assurances of compliance responsive to RFPs 8 and 10.
5. Whether Saechao was entitled to nationwide and decade-spanning discovery concerning complaints by other deaf or hard-of-hearing patients, and whether a further limited Rule 30(b)(6) deposition was warranted.

HOLDINGS

1. Western Dental had not complied with its obligation to produce documents responsive to RFP 1 and must search for and produce nonprivileged records relating to Saechao, including appointment records, scheduling records, audit-trail and keystroke information, and responsive metadata.
2. Western Dental must search for and produce nonprivileged training materials and records showing whether and when relevant San Jose office employees completed training concerning auxiliary aids and services for deaf or hard-of-hearing individuals.
3. Western Dental must produce responsive vendor contracts and records reflecting the provision of auxiliary aids and interpreter services at the San Jose office, and may not resist production merely because it must ask a contracted vendor for responsive information.
4. Western Dental must produce documents sufficient to show whether it received federal financial assistance and must produce assurances of compliance submitted when applying for federal financial assistance during the relevant period; it may alternatively respond to an admission request concerning receipt of such assistance.
5. Saechao was not entitled to discovery of all complaints nationwide concerning failures to provide auxiliary aids since 2010, but the parties must confer about whether complaints can be queried by date, location, or subject matter to obtain narrower and less burdensome relevant information.
6. Saechao may take a further limited Rule 30(b)(6) deposition concerning the documents and information ordered produced, after production and before the close of fact discovery, for no more than two hours.

KEY QUOTATIONS

“While this rule does not expressly require production of particular metadata, unless the parties have stipulated otherwise, Western Dental must, at a minimum, produce any responsive electronic records in a form that preserves standard metadata fields, such as, author, recipient, date, and file name.” (at 2)

“Western Dental may not resist production on the ground that it must ask its contracted vendor for information in order to complete its responsive document production.” (at 6)

FACTUAL BACKGROUND

Saechao, who is deaf, alleges that Western Dental failed to provide ASL interpreters during dental appointments. In discovery, Western Dental produced some communications and other materials but acknowledged or its deposition testimony indicated that additional appointment, training, interpreter-service, electronic-record, funding, and compliance-assurance records existed. Saechao sought additional production concerning his appointments, auxiliary-aid services, employee training, federal financial assistance, compliance assurances, and complaints by other patients.

PROCEDURAL HISTORY

Saechao sued Western Dental alleging failures to provide American Sign Language interpreters and other auxiliary aids in violation of the ADA, Rehabilitation Act, and ACA. During fact discovery, he sought an order compelling additional document production and a further Rule 30(b)(6) deposition. The court granted the requests in part, denied the request concerning RFP 3(a), and directed the parties to confer regarding a narrower means of obtaining complaint-related discovery.

DISPOSITION

other

CASES CITED

- Nat'l Urb. League v. Ross, No. 20-cv-05799-LHK, 2020 WL 7488068, at *2 (N.D. Cal. Dec. 13, 2020)
- In re: Social Media Adolescent Addiction/Personal Injury Products Liability Litig., No. 22-md-03047-YGR (PHK), 2024 WL 4125618, at *3 (N.D. Cal. Sept. 6, 2024)
- Illumina Cambridge Ltd. v. Complete Genomics, Inc., No. 19-mc-80215-WHO (TSH), 2020 WL 820327, at *8-*10 (N.D. Cal. Feb. 19, 2020)
- In re Citric Acid Litig., 191 F.3d 1090, 1107 (9th Cir. 1999)
- Weinreich v. Los Angeles Cnty. Metro. Transp. Auth., 114 F.3d 976, 978 (9th Cir. 1997)
- Bax v. Drs. Med. Ctr. of Modesto, Inc., 52 F.4th 858, 871-72 (9th Cir. 2022)
- Abueg v. Western Dental Services, Inc., No. 2:09-cv-09438-RGK-RNB (C.D. Cal.)