

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

Jasmine Edwards v. Ryan D. Snyder

No. 3:24-CV-00812-DRL-SJF (N.D. Ind. Feb. 4, 2026) · No. 3:24-CV-00812-DRL-SJF · Decided February 4, 2026

SUMMARY

The United States District Court for the Northern District of Indiana grants Plaintiff’s motion to compel discovery and grants Defendant’s motion to stay civil proceedings in part. The court declines to find Defendant’s one-day-late discovery objection waived but grants the motion to compel because Defendant did not oppose it or meet his burden to justify withholding the requested materials. The court stays all proceedings except production of responsive documents and requires a status report regarding the related criminal case.

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	February 4, 2026
DOCKET	3:24-CV-00812-DRL-SJF
DISPOSITION	other
PROCEDURAL POSTURE	The court resolved Plaintiff's motion to compel discovery and Defendant's motion to stay the civil action pending resolution of a related state criminal case.
STANDARD OF REVIEW	Discovery rulings and requests for a stay are reviewed under the district court's broad discretion. The court applied the Rule 26 and Rule 34 discovery standards and considered general factors governing stays of civil proceedings based on parallel criminal proceedings.
PRECEDENTIAL VALUE	unpublished district court order; nonprecedential

TOPICS

- discovery dispute
- civil procedure
- fifth amendment

PRACTICE AREAS

civil procedure

discovery

constitutional criminal procedure

QUESTIONS PRESENTED

1. Whether Defendant's one-day delay in asserting an objection to Plaintiff's second request for production waived the objection.
2. Whether Plaintiff was entitled to an order compelling production when Defendant did not respond to the motion to compel or carry his burden of showing why the requested discovery was improper.
3. Whether the civil action should be stayed because of the related criminal prosecution and the potential effect of civil discovery on Defendant's Fifth Amendment rights.

HOLDINGS

1. Defendant's one-day delay in serving his objection did not warrant total waiver because the delay resulted from counsel's mistake, caused minimal prejudice, and constituted good cause for relief from waiver.
2. Plaintiff was entitled to an order compelling Defendant to produce documents responsive to her second request for production.
3. A partial stay was appropriate because the civil and criminal proceedings arose from the same facts and civil discovery could burden Defendant's Fifth Amendment rights, but the stay did not apply to Plaintiff's motion to compel.

KEY QUOTATIONS

“The scope of discovery is outlined in Fed. R. Civ. P. 26(b)(1), which provides that, “[u]nless otherwise limited by court order”: Parties may obtain discovery regarding any nonprivileged matter that is relevant to any party's claim or defense and proportional to the needs of the case”

“In a civil action unlike a criminal case, a jury may draw adverse inferences against a defendant that invokes his Fifth Amendment right to remain silent.”

FACTUAL BACKGROUND

Plaintiff and Defendant share two minor children, and Defendant had visitation rights. During a July 2024 visitation, Defendant allegedly threatened to kill the children; after police responded, an armed standoff occurred, and one child was found dead. Indiana then charged Defendant with murder and neglect of a dependent, while Plaintiff filed this related civil action. Plaintiff sought production of materials Defendant received from prosecutors in the criminal case, but Defendant withheld them based on a purported nondisclosure agreement.

PROCEDURAL HISTORY

Plaintiff filed the civil action on October 3, 2024, arising from the same events as Defendant's pending or recently concluded state criminal prosecution. Plaintiff served a second request for production seeking discovery

materials provided to Defendant by state prosecutors. Defendant served an objection one day late and did not respond to Plaintiff's motion to compel. Defendant later moved to stay the civil case because of the overlapping criminal proceeding. The court granted the motion to compel and granted the stay in part, excluding the discovery order from the stay.

DISPOSITION

other

REMAND INSTRUCTIONS

No remand. Defendant must produce documents responsive to Plaintiff's Second Request for Production by March 3, 2026. The parties must file a status report by March 6, 2026 addressing whether the criminal trial concluded, whether Defendant intends to appeal, and proposing a scheduling plan. All proceedings are stayed except the discovery order.

CASES CITED

- Spiegel v. Kim, 952 F.3d 844, 847 (7th Cir. 2020)
- Packman v. Chicago Tribune Co., 267 F.3d 628, 646-47 (7th Cir. 2001)
- Gile v. United Airlines, Inc., 95 F.3d 492, 495-96 (7th Cir. 1996)
- Pistolis v. Ameren, Case Nos. 3:19-CV-001185-MAB, 3:19-CV-001182-MAB, 2022 WL 2159291, at *4 (S.D. Ill. June 15, 2022)
- Mr. Frank, Inc. v. Waste Management, Inc., No. 80 C 3498, 1983 WL 1859, at *1 (N.D. Ill. July 7, 1983)
- Herx v. Diocese of Fort Wayne-South Bend Inc., Case No. 1:12-CV-122, 2013 WL 5531376, at *1 (N.D. Ind. Oct. 7, 2013)
- Katz v. Batavia Marine & Sporting Supplies, Inc., 984 F.2d 422, 424 (Fed. Cir. 1993)
- Spears v. City of Indianapolis, 74 F.3d 153, 158 (7th Cir. 1996)
- Gregg v. Local 305 IBEW, Cause No. 1:08-CV-160, 2009 WL 1325103, at *8 (N.D. Ind. May 13, 2009)
- Kodish v. Oakbrook Terrace Fire Protection District, 235 F.R.D. 447, 449-50 (N.D. Ill. 2006)
- Hall v. Sullivan, 231 F.R.D. 468, 473 (D. Md. 2005)
- Schloss v. City of Chicago, No. 18 C 1880, 2020 WL 4339282, at *4 (N.D. Ill. July 28, 2020)
- Whitlow v. Martin, 259 F.R.D. 349, 354 (C.D. Ill. 2009)
- Buonauro v. City of Berwyn, No. 08 C 6687, 2011 WL 116870, at *4 (N.D. Ill. Jan. 10, 2011)
- Cox v. Sherman Capital, LLC, No. 1:12-cv-01654-TWP-MJD, 2014 WL 712659, at *2-3 (S.D. Ind. Feb. 24, 2014)
- Gutierrez v. Baldwin, Case No. 3:18-01478-SMY-RJD, 2020 WL 7123139, at *2 (S.D. Ill. Dec. 4, 2020)
- Minerly v. Holt, Case No. 3:17-cv-00520-SMY-RJD, 2019 WL 2326120, at *2 (S.D. Ill. May 31, 2019)
- Robinson v. Peck, No. 2:22-cv-131, 2023 WL 2596729, at *1 (N.D. Ind. Mar. 22, 2023)
- Landis v. North American Co., 299 U.S. 248, 254-55 (1936)
- Cruz v. County of DuPage, 1997 WL 370194, at *1-3 (N.D. Ill. June 27, 1997)

- Jones v. City of Indianapolis, 216 F.R.D. 440, 450-51 (S.D. Ind. 2003)
- U.S. Securities & Exchange Commission v. Salis, 2016 WL 7239916, at *2 (N.D. Ind. Dec. 14, 2016)
- United States v. Certain Real Property Commonly Known as 6250 Ledge Road, Egg Harbor, 943 F.2d 721, 729 (7th Cir. 1991)
- Jackson v. Zormier, No. 2:20-cv-45, 2020 WL 1899815, at *1 (N.D. Ind. Apr. 17, 2020)
- Flick v. Parker, No. 20 CV 50070, 2020 WL 4815904, at *6 (N.D. Ill. Aug. 18, 2020)
- U.S. v. Smile Center of Family Dentistry, P.C., Case No. 2:02-CV-439-JM, 2005 WL 8170010, at *3 & n.5 (N.D. Ind. Mar. 17, 2000)
- Baxter v. Palmigiano, 425 U.S. 308, 318 (1976)
- Harris v. City of Chicago, 266 F.3d 750, 753 (7th Cir. 2001)

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