

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MICHIGAN

Jane Doe v. Derek D. Hammond

Doe v. Hammond · No. 24-11490 · Decided January 16, 2026

SUMMARY

The United States District Court for the Eastern District of Michigan grants in part and denies in part Plaintiff Jane Doe’s motion to seal her brief and exhibits supporting a motion for default judgment in an assault-and-battery and intentional-infliction-of-emotional-distress action. The court permits sealing of the hospital record and psychiatric evaluation, but requires narrower redactions to the remaining materials, including names, personal identifying information, and financial account information.

CASE DETAILS

COURT	United States District Court for the Eastern District of Michigan
WRITING FOR THE COURT	F. Kay Behm
JURISDICTION	United States District Court for the Eastern District of Michigan
DECIDED	January 16, 2026
DOCKET	24-11490
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved to seal her entire brief supporting a motion for default judgment and all exhibits attached to that brief.
STANDARD OF REVIEW	The court applied the Sixth Circuit's strong presumption of public access to judicial records and required compelling reasons for nondisclosure, with sealing narrowly tailored on a document-by-document and line-by-line basis.
PRECEDENTIAL VALUE	unpublished district court order
PARTIES	Jane Doe v. Derek D. Hammond

TOPICS

- civil procedure
- default judgment
- hipaa
- medical records privacy

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Plaintiff established compelling reasons to seal her entire damages brief and all attached exhibits.
2. Whether the requested sealing was narrowly tailored to protect medical, mental-health, personal-identifying, and financial information.
3. Whether the hospital emergency report and psychiatric evaluation should remain under seal despite the public-access presumption.

HOLDINGS

1. A party seeking to seal judicial records must overcome the strong presumption of public access by showing compelling reasons, and the requested sealing must be narrowly tailored on a document-by-document and line-by-line basis.
2. The motion to seal was properly denied as to receipts, the home-closing statement, bank statements, the affidavit, and the police incident report because the asserted privacy interests could be protected through targeted redactions.
3. The court granted the motion to seal the hospital emergency report and psychiatric evaluation because Plaintiff's interest in protecting those medical records outweighed the public's interest in access.

KEY QUOTATIONS

“Only the most compelling reasons can justify non-disclosure of judicial records.” (Order)

“Sealing should be narrowly tailored and done “on a document-by-document, line-by-line basis[.]”” (Order)

“The motion to seal is therefore GRANTED IN PART as to Exhibits 48-1 and 48-4, but is otherwise DENIED.” (Order)

FACTUAL BACKGROUND

Jane Doe alleges that she was sexually assaulted at a health clinic and seeks damages for assault and battery and intentional infliction of emotional distress. Her damages materials included medical and psychiatric records, a police incident report, an affidavit, bank statements, travel and lodging receipts, and documents relating to home expenses. The complaint and other materials had already publicly disclosed factual details of the alleged assault, while Doe continued to litigate under a pseudonym.

PROCEDURAL HISTORY

Plaintiff brought claims for assault and battery and intentional infliction of emotional distress arising from an alleged sexual assault at a health clinic. While the motion for default judgment was pending, Plaintiff sought to seal her damages brief and all related exhibits. The district court granted sealing as to the hospital emergency report and psychiatric evaluation, denied the motion as to the remaining materials, and authorized narrowly tailored redactions.

DISPOSITION

other

CASES CITED

- Shane Grp., Inc. v. Blue Cross Blue Shield of Mich., 825 F.3d 299, 305-08 (6th Cir. 2016)
- In re Knoxville News-Sentinel Co., 723 F.2d 470, 476 (6th Cir. 1983)
- Rudd Equip. Co. v. John Deere Constr. & Forestry Co., 834 F.3d 589, 594 (6th Cir. 2016)
- Holmes v. United States, No. 24-3743/3744, 2025 LX 348263, at *3-*4 (6th Cir. Sep. 5, 2025)
- Miller v. Ind. Hosp., 16 F.3d 549, 551 (3d Cir. 1994)
- Doe v. Mich. State Univ., No. 1:19-cv-226, 2019 U.S. Dist. LEXIS 252361, 2019 WL 13417783, at *3 (W.D. Mich. Aug. 14, 2019)
- Doe v. Cabrera, 307 F.R.D. 1, 5 (D.D.C. 2014)
- Harrison v. Scott, No. 2:18-cv-1023, 2021 U.S. Dist. LEXIS 111541, at *3 (S.D. Ohio June 15, 2021)
- United States v. McCallum, No. 21-20088, 2024 LX 181536, at *3 (E.D. Mich. July 8, 2024)
- Chibbaro v. Everett, No. 3:20-cv-00663, 2022 U.S. Dist. LEXIS 243882, at *8 (M.D. Tenn. Mar. 23, 2022)

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