

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
WEST VIRGINIA, HUNTINGTON DIVISION

R.C., as Parent and Legal Guardian of N.C., a minor child v.
Mariana Lanata Piazzon, M.D. and Marshall University Board of
Governors

R.C. v. Piazzon · No. 3:24-0695 · Decided March 30, 2026

SUMMARY

The court grants defendants’ motion to unseal a memorandum opinion and order that had been sealed because it discussed the minor plaintiff’s medical information. Applying the First Amendment right of access to documents filed in connection with summary judgment, the court finds no compelling interest justifying continued sealing and directs the parties to address whether related sealed filings should also be unsealed.

CASE DETAILS

COURT	United States District Court for the Southern District of West Virginia, Huntington Division
WRITING FOR THE COURT	Robert C. Chambers
JURISDICTION	United States District Court for the Southern District of West Virginia, Huntington Division
DECIDED	March 30, 2026
DOCKET	3:24-0695
DISPOSITION	other
PROCEDURAL POSTURE	Defendants moved to unseal the court's previously sealed memorandum opinion and order resolving summary judgment issues.
STANDARD OF REVIEW	Documents attached to dispositive motions are subject to the First Amendment right of public access. Restrictions on that right require a compelling governmental interest and narrow tailoring; the party seeking restriction bears the burden and must provide specific reasons.
PRECEDENTIAL VALUE	Unknown

TOPICS

- summary judgment
- first amendment
- medical records privacy
- civil procedure
- constitutional law

PRACTICE AREAS

civil procedure

constitutional law

health law

QUESTIONS PRESENTED

1. Whether the First Amendment right of public access applies to a memorandum opinion and order resolving a summary judgment matter.
2. Whether a compelling governmental interest justified continued sealing of the memorandum opinion and order.
3. Whether the court should direct further briefing concerning unsealing documents previously sealed in connection with the parties' motions.

HOLDINGS

1. The First Amendment right of public access applies to the memorandum opinion and order because it was a summary-judgment ruling.
2. No compelling interest justified sealing the memorandum opinion and order, so the order had to be unsealed.
3. The court directed the parties to file memoranda addressing whether documents sealed under the February 27, 2026 order should be unsealed.

KEY QUOTATIONS

“In contrast, a court may restrict the public’s First Amendment right of access “only on the basis of a compelling governmental interest, and only if the denial is narrowly tailored to serve that interest.””

“The Court GRANTS Defendants’ Motion and DIRECTS the Clerk to unseal the Court’s Memorandum Opinion and Order (ECF 66).”

FACTUAL BACKGROUND

The court had sealed a memorandum opinion and order discussing the minor plaintiff's medical information and an ailment. The earlier sealing decision was based on the parties' requests to seal medical information, including documents that did not identify the plaintiff by name. Defendants later represented that the risk of identifying the minor through his parents' names had been eliminated because those names were no longer publicly accessible.

PROCEDURAL HISTORY

The court had previously directed the Clerk to seal its memorandum opinion and order and had granted motions to seal documents containing or discussing the minor plaintiff's medical information. Defendants moved to unseal the memorandum opinion and order, asserting that the concern about identifying the minor through his parents' names no longer existed. The court granted the motion, directed the Clerk to unseal the memorandum opinion and order, and ordered the parties to brief whether the materials sealed under earlier orders should also be unsealed.

DISPOSITION

other

CASES CITED

- Virginia Dep't of State Police v. Washington Post, 386 F.3d 567, 575 (4th Cir. 2004)
- Stone v. University of Maryland Medical System Corp., 855 F.2d 178, 180 (4th Cir. 1988)
- Rushford v. New Yorker Magazine, Inc., 846 F.2d 249, 253 (4th Cir. 1988)
- United States ex rel. Oberg v. Nelnet, Inc., 105 F.4th 161, 171-72 (4th Cir. 2024)

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