

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
NORTH CAROLINA

Shoals Technologies Group, LLC v. Voltage, LLC, and Ningbo
Voltage Smart Production Co.

No. 1:25CV26, United States District Court for the Middle District of North Carolina (May 21, 2026)

SUMMARY

The United States District Court for the Middle District of North Carolina addresses motions to seal materials filed in connection with trial exhibits, a preliminary-injunction reply, a motion to reopen fact discovery, and a claim-construction motion. The court grants the motions concerning confidential financial, corporate, and technical information, grants the trial-transcript motion in part, and denies the motion concerning materials supporting the motion to reopen discovery. The court also directs the unsealing of specified discovery-related filings.

CASE DETAILS

COURT	United States District Court for the Middle District of North Carolina
JURISDICTION	United States District Court for the Middle District of North Carolina
DECIDED	May 21, 2026
DOCKET	1:25CV26
DISPOSITION	other
PROCEDURAL POSTURE	Order resolving multiple motions to seal documents filed in connection with motions to unseal trial exhibits, a preliminary-injunction matter, and a motion to reopen fact discovery.
STANDARD OF REVIEW	The court applied the common-law and First Amendment standards governing public access to judicial records, and the good-cause standard under Federal Rule of Civil Procedure 26(c) where the materials were not judicial records.
PRECEDENTIAL VALUE	Unknown

TOPICS

- civil procedure
- discovery dispute
- injunctions
- commercial litigation
- patent law

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the materials submitted with the various motions were judicial records subject to the common-law or First Amendment right of public access.
2. What standard governed the motions to seal, including whether good cause under Federal Rule of Civil Procedure 26(c) sufficed for materials filed in support of purely procedural motions.
3. Whether the parties established a sufficient interest in confidentiality and showed that sealing or redaction was narrowly tailored and that less restrictive alternatives were inadequate.
4. Whether the court should grant, deny, or partially grant the motions to seal docket entries 422, 425, 430, and 432.

HOLDINGS

1. The common-law right of access applies to judicial records but may be rebutted when countervailing interests heavily outweigh the public interest in access. The First Amendment right of access is narrower and applies only to particular judicial records and documents.
2. Documents filed in support of a purely procedural motion, such as a motion to reopen fact discovery, are not judicial records for purposes of the public right of access; a showing of good cause under Federal Rule of Civil Procedure 26(c) is sufficient to seal such materials.
3. The motion to seal docket entry 422 was granted in part and denied in part. The court permitted sealing of the trial-transcript excerpts but denied sealing of the memorandum because the proposed redactions did not involve confidential or sensitive information.
4. The motion to seal docket entry 425 was granted, including the proposed redactions to docket entry 427 and the sealing of exhibits 427-1 through 427-4.
5. The motion to seal docket entry 432 was granted, including docket entries 433 and 433-1, because the materials contained proprietary technical design information and were judicial records subject to at least the common-law access standard.

KEY QUOTATIONS

“The common law right of access applies to all judicial records but can be rebutted if “countervailing interests heavily outweigh the public interests in access.”” (I.A)

“The First Amendment right of access is narrower and applies only to particular judicial records and documents.” (I.A)

“In weighing a motion to seal, a court must consider less drastic alternatives to sealing and if a motion is allowed, the court must “state the reasons” and explain reasons for “rejecting alternatives to sealing.”” (I.A)

“The Motion to Seal, Docket Entry 422, is GRANTED IN PART AND DENIED IN PART.” (II)

FACTUAL BACKGROUND

The parties sought to seal or redact filings and exhibits containing trial-transcript excerpts, financial and corporate information, confidential solar-assembly design details, expert materials, discovery materials, and filings from related ITC proceedings. Some requests were made by a party that did not claim confidentiality on its own behalf, while others concerned materials designated confidential under a protective order. The court evaluated whether the materials were judicial records, whether the applicable access standard was satisfied, and whether sealing was narrowly tailored or whether less restrictive alternatives were available.

PROCEDURAL HISTORY

The parties filed motions seeking to seal or redact filings and exhibits under the common-law and First Amendment rights of public access to judicial records, Federal Rule of Civil Procedure 26(c), and the governing protective order. The court granted some requests, denied others, ordered certain materials unsealed, and directed the filing of an unredacted version of one memorandum.

DISPOSITION

other

CASES CITED

- United States ex rel. Oberg v. Nelnet, Inc., 105 F.4th 161, 170-71 (4th Cir. 2024)
- Rushford v. New Yorker Magazine, Inc., 846 F.2d 249, 253 (4th Cir. 1988)
- Nixon v. Warner Communications, Inc., 435 U.S. 589, 597-98 (1978)
- Virginia Department of State Police v. Washington Post, 386 F.3d 567, 575-79 (4th Cir. 2004)
- Doe v. Public Citizen, 749 F.3d 246, 266, 272 (4th Cir. 2014)
- In re Knight Publishing Co., 743 F.2d 231, 235 (4th Cir. 1984)
- United States ex rel. Thomas v. Duke University, No. 1:17CV276, 2018 WL 4211375, at *13 (M.D.N.C. Sept. 4, 2018)
- Kinetic Concepts, Inc. v. Convatec Inc., No. 1:08CV918, 2010 WL 1418312, at *9-10 (M.D.N.C. Apr. 2, 2010)
- In re United States for an Order Pursuant to 18 U.S.C. § 2703(d), 707 F.3d 283, 290-91 (4th Cir. 2013)
- Syngenta Crop Protection, LLC v. Wildwood, LLC, No. 1:15CV274, 2017 WL 1168507, at *2 (M.D.N.C. Mar. 28, 2017)
- SmithKline Beecham Corp. v. Abbott Laboratories, No. 1:15CV360, 2017 WL 11552659, at *3 (M.D.N.C. Mar. 7, 2017)
- Azima v. Del Rosso, No. 1:20CV954, 2025 WL 2903820, at *1 (M.D.N.C. July 14, 2025)
- RLI Insurance Co. v. Nexus Services, Inc., No. 18-CV-66, 2018 WL 10602398, at *1 (W.D. Va. Oct. 30, 2018)
- Colony Insurance Co. v. Peterson, No. 1:10CV581, 2012 WL 1047089, at *2 (M.D.N.C. 2012)