

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

Joshua Tanner Hahn v. Z. Taylor

Hahn v. Taylor · No. 3:24-CV-926-CCB-JEM · Decided January 30, 2026

SUMMARY

The United States District Court for the Northern District of Indiana overruled Joshua Tanner Hahn’s objection to a magistrate judge’s discovery rulings in his Eighth Amendment failure-to-protect action against Officer Z. Taylor. The court upheld the denial of spoliation sanctions, the rulings concerning employment records and post orders, and the extension of time for responding to interrogatories. It ordered production of a redacted version of relevant post orders and required the formal disciplinary charges to be filed ex parte and under seal.

CASE DETAILS

COURT	United States District Court for the Northern District of Indiana, South Bend Division
WRITING FOR THE COURT	Cristal C. Brisco
JURISDICTION	United States District Court for the Northern District of Indiana, South Bend Division
DECIDED	January 30, 2026
DOCKET	3:24-CV-926-CCB-JEM
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff objected under Federal Rule of Civil Procedure 72(a) to a magistrate judge's discovery order addressing a motion to compel, spoliation sanctions, and extensions of time to respond to interrogatories. The district court reviewed the objection for clear error or a ruling contrary to law, overruled the objection, partially granted a later motion to compel, and ordered limited production and filing of documents under seal.
STANDARD OF REVIEW	Under Federal Rule of Civil Procedure 72(a) and 28 U.S.C. § 636(b) (1), the district court may modify or set aside a magistrate judge's nondispositive order only if it is clearly erroneous or contrary to law. Clear error exists when the court is left with the definite and firm conviction that a mistake has been made.

PRECEDENTIAL VALUE	Unknown
PARTIES	Joshua Tanner Hahn v. Z. Taylor

TOPICS

discovery dispute sanctions evidence prisoners rights civil procedure

PRACTICE AREAS

Civil procedure Prisoner civil rights Discovery Evidence spoliation Protective orders

QUESTIONS PRESENTED

1. Whether the magistrate judge applied the correct standard in declining to impose spoliation sanctions for missing video footage.
2. Whether the magistrate judge clearly erred in ordering production of post orders relating to inmate protection and in permitting Taylor to identify responsive documents.
3. Whether the magistrate judge clearly erred in granting extensions of time for Taylor to respond to interrogatories.
4. Whether the court should require the formal disciplinary charges from Taylor's employment file to be filed publicly and allow Hahn to retain a personal copy.

HOLDINGS

1. In a spoliation matter not involving violation of a discovery order, the crucial showing is that the evidence was destroyed for the purpose of hiding adverse information; a showing that the evidence was destroyed or that a preservation duty was violated, without that bad-faith purpose, did not warrant sanctions here.
2. The magistrate judge did not clearly err by requiring Taylor to file responsive post orders under seal for judicial review and by allowing Taylor to identify which documents were responsive to the discovery order.
3. The post orders could not be disclosed in their entirety because of safety and security concerns, but Taylor was ordered to file and serve a redacted version revealing at least the title of Section IV, its first two sentences, and information identifying the document.
4. A motion to extend a deadline need not specify the exact later date requested when the movant shows good cause for an extension as a general matter; the magistrate judge did not clearly err in deeming Taylor's November 14, 2025 response timely.
5. The formal charges relating to the attack had to be filed ex parte and under seal, and Hahn could review them only under correctional-staff supervision rather than retain a personal copy.

KEY QUOTATIONS

“The clear error standard means that the district court can overturn the magistrate judge’s ruling only if the district court is left with the definite and firm conviction that a mistake has been made.”

“The crucial element in a spoliation claim is not the fact that the documents were destroyed but that they were destroyed for the purpose of hiding adverse information.”

“A document is destroyed in bad faith if it is destroyed for the purpose of hiding adverse information.”

FACTUAL BACKGROUND

Hahn alleged that Officer Taylor failed to protect him from another inmate who attacked him at Indiana State Prison on March 9, 2024. Hahn sought Taylor's employment file, post orders, and video recordings covering the period surrounding the attack. Taylor produced a five-minute recording of the attack but stated that no other responsive footage had been preserved, and he objected to producing portions of the employment file and post orders based on relevance, confidentiality, and prison-security concerns.

PROCEDURAL HISTORY

Hahn, a prisoner proceeding without counsel, sued Officer Taylor under the Eighth Amendment for allegedly failing to protect him from an inmate attack. A magistrate judge ordered limited production concerning Taylor's employment file, required post orders to be filed under seal for review, declined to impose spoliation sanctions, and granted extensions for interrogatory responses. Hahn objected to those rulings. The district court overruled the objection, ordered a redacted version of the post orders to be filed and served, and required the formal charges from Taylor's employment file to be filed ex parte and under seal.

DISPOSITION

other

REMAND INSTRUCTIONS

No remand. Officer Taylor was ordered to file and serve the required redacted post orders and to file the formal charges ex parte and under seal by February 13, 2026. The objection was overruled and the motion to compel was partially granted.

CASES CITED

- Weeks v. Samsung Heavy Industries Co. Ltd., 126 F.3d 926, 943 (7th Cir. 1997)
- National Hockey League v. Metropolitan Hockey Club, Inc., 427 U.S. 639 (1976)
- Marrocco v. General Motors Corp., 966 F.2d 220 (7th Cir. 1992)
- Downing v. Abbott Laboratories, 48 F.4th 793, 812 (7th Cir. 2022)
- Norman-Nunnery v. Madison Area Technical College, 625 F.3d 422, 428 (7th Cir. 2010)
- Faas v. Sears, Roebuck & Co., 532 F.3d 633, 644 (7th Cir. 2008)
- Trask-Morton v. Motel 6 Operating L.P., 534 F.3d 672, 681 (7th Cir. 2008)

