

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
CALIFORNIA

Chavez v. Allstate Northbrook Indemnity Company

No. 22-cv-00166-AJB-DEB (S.D. Cal. June 25, 2025) · No. 22-cv-00166-AJB-DEB · Decided June 25, 2025

SUMMARY

The United States District Court for the Southern District of California denied without prejudice Plaintiff’s motion to file documents under seal in support of her opposition to Allstate’s motion for summary judgment. The court held that the compelling-reasons standard applied and found that the parties had not provided particularized, fact-supported reasons or narrowly tailored redactions sufficient to justify sealing the exhibits and opposition brief.

CASE DETAILS

COURT	United States District Court for the Southern District of California
WRITING FOR THE COURT	Anthony J. Battaglia
JURISDICTION	United States District Court for the Southern District of California
DECIDED	June 25, 2025
DOCKET	22-cv-00166-AJB-DEB
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved to file under seal exhibits supporting her opposition to Defendant's motion for summary judgment. Defendant filed a notice of non-opposition and joinder. The district court denied the motion to seal without prejudice.
STANDARD OF REVIEW	The court applied the strong presumption of public access to judicial records and required a particularized showing of compelling reasons, supported by factual evidence, for materials filed in connection with a motion for summary judgment.
PRECEDENTIAL VALUE	nonprecedential

TOPICS

- civil procedure
- summary judgment
- commercial litigation
- insurance

PRACTICE AREAS

QUESTIONS PRESENTED

1. What standard governs a request to seal documents filed in connection with a motion for summary judgment?
2. Whether Plaintiff and Allstate made the particularized, evidence-supported and narrowly tailored showing necessary to overcome the public's presumptive right of access to the exhibits and redacted opposition brief.

HOLDINGS

1. Because documents filed in connection with a motion for summary judgment are more than tangentially related to the merits, a party seeking to seal them must satisfy the compelling-reasons standard rather than the good-cause standard.
2. A party seeking to seal judicial records must overcome the strong presumption of public access by articulating particularized, compelling reasons supported by factual evidence, and the request must be narrowly tailored to the portions warranting protection.
3. The motion to seal Plaintiff's exhibits and redacted opposition brief was denied without prejudice because the parties failed to make a particularized, evidence-supported showing of compelling reasons and failed to propose adequately targeted redactions.

KEY QUOTATIONS

"In order to overcome this strong presumption, a party seeking to seal a judicial record must articulate justifications for sealing that outweigh the public policies favoring disclosure." (at 1-2)

"The court must consider these interests and "base its decision on a compelling reason and articulate the factual basis for its ruling, without relying on hypothesis or conjecture."" (at 2)

"The "compelling reasons" rule requires the parties to "narrowly tailor[] their request to redact only the portions of the filings and the precise exhibits" that are deemed confidential." (at 4)

FACTUAL BACKGROUND

Plaintiff sought to seal portions of four expert-declaration exhibits and the entirety of eight other exhibits submitted in support of her opposition to Allstate's motion for summary judgment. The requests relied primarily on Allstate's designations under a stipulated protective order and generalized assertions that the materials contained confidential, financial, competitive, and regulatory information. The parties did not provide document-specific factual explanations or narrowly tailored redactions, and some materials contained apparently public information.

PROCEDURAL HISTORY

In the pending federal class action, Plaintiff filed a motion to seal portions or all of several exhibits and redactions in her opposition to Allstate's motion for summary judgment. Allstate joined the request without

opposition. The district court decided the motion on the papers under Civil Local Rule 7.1.d.1 and denied the sealing request without prejudice, allowing supplemental briefing within seven days.

DISPOSITION

other

REMAND INSTRUCTIONS

No remand. Allstate may submit supplemental briefing within seven days providing particularized reasons or additional facts supporting sealing, or proposing targeted redactions. If no supplemental briefing is filed, the Clerk will docket the exhibits in accordance with the order; the exhibits remain lodged in the interim.

CASES CITED

- Nixon v. Warner Communications, Inc., 435 U.S. 589, 597 & n.7 (1978)
- Kamakana v. City & County of Honolulu, 447 F.3d 1172, 1178-79 (9th Cir. 2006)
- Foltz v. State Farm Mutual Automobile Insurance Co., 331 F.3d 1122, 1135-36 (9th Cir. 2003)
- Hagestad v. Tragesser, 49 F.3d 1430, 1434 (9th Cir. 1995)
- Ctr. for Auto Safety v. Chrysler Grp., LLC, 809 F.3d 1092, 1096-1102 (9th Cir. 2016)
- Krommenhock v. Post Foods, LLC, 334 F.R.D. 552, 586 (N.D. Cal. 2020)
- In re Ferrero Litigation, No. 11-CV-205 H(CAB), 2011 WL 3360443, at *2 (S.D. Cal. Aug. 3, 2011)
- ImprimisRx, LLC v. OSRX, Inc., No. 21-cv-1305-BAS-DDL, 2024 WL 1269474, at *2, *4 (S.D. Cal. Mar. 25, 2024)
- Bovier v. Bridgepoint Education/Ashford University, No. 3:17-cv-01052-GPC-JMA, 2018 WL 11411260, at *2 (S.D. Cal. June 27, 2018)
- In re Qualcomm Litigation, No. 17-cv-108-GPC-MDD, 2017 WL 5176922, at *2 (S.D. Cal. Nov. 8, 2017)
- Day v. GEICO Casualty Co., No. 21-CV-02103-BLF, 2023 WL 6558404, at *2 (N.D. Cal. Sept. 21, 2023)