

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA

Bloom Golf Partners LLC v. Rachel Ridgeway

Bloom Golf · No. 4:25-CV-02470 · Decided January 5, 2026

SUMMARY

The United States District Court for the Middle District of Pennsylvania granted Bloom Golf Partners LLC’s motion for expedited discovery in its action against Rachel Ridgeway. The court applied the good-cause or reasonableness standard and found that the need to prevent spoliation and recover business materials outweighed the limited burden on Ridgeway. The order requires Ridgeway to identify devices and accounts capable of storing specified file types and permits narrowly limited imaging and searches for files identified in Bloom’s exhibit.

CASE DETAILS

COURT	United States District Court for the Middle District of Pennsylvania
WRITING FOR THE COURT	Matthew W. Brann
JURISDICTION	United States District Court for the Middle District of Pennsylvania
DECIDED	January 5, 2026
DOCKET	4:25-CV-02470
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved for expedited recovery discovery before the parties' Rule 26(f) conference, seeking an interrogatory identifying devices and accounts capable of storing specified files and limited imaging and inspection of those devices and accounts. The district court granted the motion and entered a narrowly tailored discovery order.
STANDARD OF REVIEW	The court applied the good-cause or reasonableness standard for expedited discovery, weighing the need for early discovery against the breadth of the requests and prejudice or burden to the responding party.
PRECEDENTIAL VALUE	Unknown; district-court memorandum opinion and order
PARTIES	Bloom Golf Partners LLC v. Rachel Ridgeway

TOPICS

discovery dispute

civil procedure

trade secret misappropriation

commercial litigation

PRACTICE AREAS

civil procedure

commercial litigation

trade secret misappropriation

electronic discovery

QUESTIONS PRESENTED

1. Whether Bloom demonstrated good cause for expedited discovery before the Rule 26(f) conference.
2. Whether the requested interrogatory, device and account imaging, and limited search were sufficiently narrow and proportional to avoid undue burden or prejudice to Ridgeway.

HOLDINGS

1. A party seeking expedited discovery must demonstrate that the request is reasonable in light of the relevant circumstances by showing that the need for early discovery outweighs the breadth of the request and the prejudice or hardship to the responding party.
2. Bloom established good cause for expedited discovery because the limited discovery was directed at preventing the loss of potentially spoliated evidence and enabling the business to proceed, and those needs outweighed the limited burden on Ridgeway.
3. Expedited discovery must be narrowly tailored, and the vendor may search and disclose only the specified files or their derivatives identified in Plaintiff's Exhibit A.

KEY QUOTATIONS

“Under the good cause approach, “the party seeking expedited discovery must demonstrate that its ‘request is reasonable in light of the relevant circumstances.’” (Section II)

“The need to prevent spoliation of evidence and to allow Bloom to continue to operate its business—the needs for expedited discovery—far outweigh the limited hardship that could arise if the motion were granted.” (Section III)

FACTUAL BACKGROUND

Bloom employed Ridgeway as a search executive and human-resources consultant and gave her access to company devices, email, shared files, and confidential business information. While employed, Ridgeway allegedly formed a competing coaching and consulting business, downloaded a company contact list, deleted hundreds of company documents and thousands of emails, and factory-reset her company laptop before returning it. Bloom sought expedited discovery to identify devices and accounts that might contain the allegedly deleted or copied materials and to permit narrowly limited imaging and searches.

PROCEDURAL HISTORY

Bloom filed a six-count complaint on December 19, 2025, and filed its motion for expedited discovery three days later. Ridgeway opposed the motion on January 5, 2026. The district court concluded that good cause supported limited expedited discovery because of the alleged destruction of electronic evidence and Bloom's

asserted need for company documents, despite the delay in filing and the absence of a pending preliminary-injunction hearing.

DISPOSITION

other

CASES CITED

- Strike 3 Holdings, LLC v. Doe, No. 3:24-CV-1642, 2024 WL 4900017 (M.D. Pa. Nov. 26, 2024)
- Bizzell Corp. v. Tripwire S., LLC, No. 1:25-CV-680, 2025 WL 2211473 (M.D. Pa. Aug. 4, 2025)
- Leone v. Towanda Borough, No. 3:12-0429, 2012 WL 1123958, at *2 (M.D. Pa. Apr. 4, 2012)
- Flatiron Crane Operating Co., LLC v. Adkins, No. 5:23-CV-02396-JMG, 2023 WL 4565470 (E.D. Pa. July 17, 2023)
- Kone Corp. v. ThyssenKrupp USA, Inc., No. CIV.A. 11-465-LPS, 2011 WL 4478477, at *4 (D. Del. Sept. 26, 2011)
- Spark Orthodontics v. ORMCO Corp., No. CV 21-2841, 2021 WL 7908194, at *1 (E.D. Pa. Oct. 25, 2021)
- Bath Auth., LLC v. Anzzi LLC, No. 18-00834, 2018 WL 5112889, at *9 (E.D. Pa. Oct. 19, 2018)
- Let Them Play Mn v. Walz, 517 F. Supp. 3d 870, 889 (D. Minn. 2021)
- Better Packages, Inc. v. Zheng, No. 05-447, 2006 U.S. Dist. LEXIS 30119, at *15 (D.N.J. May 17, 2006)

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