

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
INDIANA, INDIANAPOLIS DIVISION

Castle 8604, LLC v. Selective Insurance Company

Castle 8604 · No. 1:26-cv-00105-JRS-MJD · Decided March 2, 2026

SUMMARY

The United States District Court for the Southern District of Indiana denied Castle 8604, LLC's motion to maintain under seal portions of its Rule 7.1 Disclosure Statement identifying the company's members. The court held that the disclosure statement implicates subject-matter jurisdiction and that the plaintiff had not shown good cause for sealing it. The court ordered the statement unsealed after 21 days absent further objection or court action and required an amended disclosure addressing the domicile and permanent-resident status of each member or equity investor.

CASE DETAILS

COURT	United States District Court for the Southern District of Indiana, Indianapolis Division
WRITING FOR THE COURT	Mark J. Dinsmore
JURISDICTION	United States District Court for the Southern District of Indiana, Indianapolis Division
DECIDED	March 2, 2026
DOCKET	1:26-cv-00105-JRS-MJD
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved to maintain portions of its Federal Rule of Civil Procedure 7.1 disclosure statement under seal. The motion was decided on the papers after the defendant failed to respond within the applicable deadline.
STANDARD OF REVIEW	The court applied the federal common-law presumption of public access to judicial documents and required the party seeking secrecy to demonstrate good cause. The court also independently examined subject matter jurisdiction.
PRECEDENTIAL VALUE	district court order; precedential status not stated

TOPICS

- subject matter jurisdiction
- civil procedure
- insurance coverage
- commercial litigation

PRACTICE AREAS

civil procedure

insurance

commercial litigation

federal jurisdiction

QUESTIONS PRESENTED

1. Whether plaintiff established good cause to maintain portions of its Rule 7.1 disclosure statement under seal.
2. Whether the Rule 7.1 disclosure statement adequately established complete diversity of citizenship for purposes of federal subject matter jurisdiction.
3. What remedial action should be taken regarding the deficient disclosure statement and the requested sealing.

HOLDINGS

1. Plaintiff did not show good cause for sealing the names of its members, because its generalized concerns about harassment and antisemitism did not establish that unsealing the disclosure statement would cause a particularized risk of harm.
2. A Rule 7.1 disclosure statement that bears directly on the court's subject matter jurisdiction is presumptively open to public view and may be sealed only upon a showing of good cause.
3. The disclosure statement was deficient because it did not state whether the Irish citizen identified as a source of plaintiff's citizenship was a lawful permanent resident of the United States domiciled in New Jersey, an exception that could defeat diversity jurisdiction.

KEY QUOTATIONS

“Documents that affect the disposition of federal litigation are presumptively open to public view, even if the litigants strongly prefer secrecy, unless a statute, rule, or privilege justifies confidentiality.” (Section II)

“Plaintiff has not shown good cause to maintain its Rule 7.1 Disclosure Statement under seal, and the motion is therefore denied.” (Section III)

“Plaintiff's Amended Rule 7.1 Disclosure Statement must state whether each member or equity investor is a permanent resident of the United States and identify the State or foreign state where each member is domiciled.” (Section IV)

FACTUAL BACKGROUND

The case concerns an insurance coverage dispute arising from a damaged water pipe. Plaintiff is a limited liability company whose citizenship depends on the citizenship of its members or equity investors. Plaintiff's disclosure statement identified members or investors connected to Israel and Ireland, while defendant is a New Jersey corporation. Plaintiff sought to conceal the members' names based principally on concerns about antisemitic harassment and their connections to the United States.

PROCEDURAL HISTORY

Plaintiff initially filed an insurance coverage action in state court. Defendant removed the action to federal court based on diversity jurisdiction. After removal, the parties filed Rule 7.1 disclosure statements, and plaintiff moved to keep portions of its disclosure statement identifying its members under seal. The court denied the motion, directed the clerk to unseal the disclosure statement after 21 days absent an objection or other specified filing, and ordered plaintiff to file an amended disclosure statement addressing the permanent-resident and domicile status of each member or equity investor.

DISPOSITION

other

CASES CITED

- Wise v. Wachovia Securities, LLC, 450 F.3d 265, 267 (7th Cir. 2006)
- In re Specht, 622 F.3d 697, 701 (7th Cir. 2010)
- Bond v. Utreras, 585 F.3d 1061, 1073 (7th Cir. 2009)
- Goesel v. Boley Int'l (H.K.) Ltd., 738 F.3d 831, 832 (7th Cir. 2013)
- Baxter Int'l, Inc. v. Abbott Labs., 297 F.3d 544, 547 (7th Cir. 2002)
- Citizens First Nat'l Bank of Princeton v. Cincinnati Ins. Co., 178 F.3d 943, 945 (7th Cir. 1999)
- In re Bridgestone / Firestone, Inc., ATX, ATX II, & Wilderness Tires Prods. Liab. Litig., 198 F.R.D. 654, 656 (S.D. Ind. 2001)
- In re Associated Press, 162 F.3d 503, 510 (7th Cir. 1998)
- Union Oil Co. of California v. Leavell, 220 F.3d 562, 567 (7th Cir. 2000)
- Hay v. Ind. State Bd. of Tax Comm'rs, 312 F.3d 876, 879 (7th Cir. 2002)
- Ruhrgas AG v. Marathon Oil Co., 526 U.S. 574, 577 (1999)
- Doe I v. South Madison Community School Corporation, 2024 WL 4476294 (S.D. Ind. Oct. 11, 2024)