

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
NEW YORK

Jane Doe v. Harry McCarthy

No. 6:25-cv-1531 (BKS/MJK) (N.D.N.Y. Feb. 27, 2026) · No. 6:25-cv-1531 (BKS/MJK) · Decided February 27, 2026

SUMMARY

The United States District Court for the Northern District of New York grants Plaintiff Jane Doe’s motion to proceed under a pseudonym in an action alleging sexual abuse and the creation and distribution of images depicting her nude body. Applying the Second Circuit’s factors governing anonymous litigation, the court finds that the sensitive nature of the allegations, risks of emotional and reputational harm, Plaintiff’s vulnerability, lack of prejudice to Defendant, and insufficiency of alternative protections support pseudonymity.

CASE DETAILS

COURT	United States District Court for the Northern District of New York
WRITING FOR THE COURT	Mitchell J. Katz
JURISDICTION	United States District Court for the Northern District of New York
DECIDED	February 27, 2026
DOCKET	6:25-cv-1531 (BKS/MJK)
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved for permission to proceed under the pseudonym Jane Doe. Defendant consented to the requested relief.
STANDARD OF REVIEW	The decision whether to permit a party to proceed anonymously is committed to the sound discretion of the district court, which balances the plaintiff's interest in anonymity against the public interest in disclosure and any prejudice to the defendant.
PRECEDENTIAL VALUE	unpublished district court memorandum-decision and order; persuasive only

TOPICS

civil procedure

pleadings

remedies

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Plaintiff should be permitted to proceed under a pseudonym when the action concerns highly sensitive allegations of child sexual abuse material and public identification could cause further psychological, reputational, and professional harm.
2. Whether allowing Plaintiff to proceed anonymously would unfairly prejudice Defendant or undermine the public interest in disclosure.

HOLDINGS

1. Plaintiff established exceptional circumstances warranting anonymity because the litigation involves highly sensitive and personal matters, public identification created a substantial risk of additional psychological, reputational, and professional harm, Plaintiff was particularly vulnerable, her identity had remained confidential, Defendant knew her identity and consented, and alternative protective measures were insufficient.

KEY QUOTATIONS

““When evaluating a request by a party to proceed anonymously or by pseudonym courts consider numerous factors, including whether identification would put the affected party at risk of suffering physical or mental injury.”” (Discussion, § II.A)

““[P]seudonyms are the exception and not the rule,” and a party seeking to “receive the protections of anonymity ... must make a case rebutting that presumption.”” (Discussion, § II.A)

“Plaintiff shall appear in this action as “Jane Doe,” that she be identified in all papers and pleadings filed in this action as “Jane Doe,” and any documents/images that are filed in the public record be redacted so as not to identify her.” (Wherefore clause)

FACTUAL BACKGROUND

Plaintiff alleges that her stepfather sexually abused her while she slept when she was thirteen and created approximately thirty images depicting her nude body. She alleges that the images were distributed and that at least one other person possessed them, causing continuing emotional distress. Plaintiff feared that public disclosure of her name would associate her with the images and cause additional humiliation, stigma, reputational injury, and professional harm; Defendant knew her identity and consented to pseudonymity.

PROCEDURAL HISTORY

Plaintiff filed this federal action under a pseudonym and moved for permission to continue proceeding anonymously. The Northern District of New York evaluated the motion under the Second Circuit's balancing factors governing requests to proceed anonymously and granted the motion, directing that Plaintiff appear as Jane Doe and that public filings be redacted to protect her identity.

DISPOSITION

other

CASES CITED

- John Wiley & Sons, Inc. v. John Does Nos. 1-27, No. 11-CV-7627, 2012 WL 364048, at *1 (S.D.N.Y. Feb. 3, 2012)
- Guerrilla Girls, Inc. v. Kaz, 224 F.R.D. 571, 573 (S.D.N.Y. 2004)
- Sealed Plaintiff v. Sealed Defendant, 537 F.3d 185, 189–90 (2d Cir. 2008)
- N. Jersey Media Group, Inc. v. Doe, 2012 WL 5899331, at *4 (S.D.N.Y. Nov. 26, 2012)
- Doe v. Delta Air Lines, Inc., No. 23-CV-931, 2023 WL 7000939, at *2 (E.D.N.Y. Sept. 7, 2023)
- United States v. Pilcher, 950 F.3d 39, 45 (2d Cir. 2020)
- Doe No. 2 v. Kolko, 242 F.R.D. 193, 197–98 (E.D.N.Y. 2006)
- Doe V. Grace Baptist Church, 1:21-cv-890 (BKS/DJS), 2022 U.S. Dist. LEXIS 84767, at *7 (N.D.N.Y. May 11, 2022)
- Doe v. DNA Diagnostics, No. 25-CV-2878, 2025 WL 1725449, at *6 (S.D.N.Y. 2025)
- Doe v. Smith, No. 1:19-cv-1121 (GLS/DJS), 2019 U.S. Dist. LEXIS 205707, at *6

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