

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
WISCONSIN

Tiron Washington, Jr. v. Sergeant Simpson et al.

No. 25-cv-0830-bhl (E.D. Wis. Apr. 20, 2026) · No. 25-cv-0830-bhl · Decided April 20, 2026

SUMMARY

The United States District Court for the Eastern District of Wisconsin partially granted Defendants’ motion concerning Plaintiff’s access to video recordings, allowing Plaintiff to possess the videos but prohibiting him from sharing them with others. The court denied Plaintiff’s motion to compel and granted Defendants’ motion to extend the dispositive-motion deadline to June 11, 2026.

CASE DETAILS

COURT	United States District Court for the Eastern District of Wisconsin
WRITING FOR THE COURT	Brett H. Ludwig
JURISDICTION	United States District Court for the Eastern District of Wisconsin
DECIDED	April 20, 2026
DOCKET	25-cv-0830-bhl
DISPOSITION	other
PROCEDURAL POSTURE	During discovery in a prisoner civil-rights action, the defendants moved to restrict the plaintiff's access to produced videos, the plaintiff moved to compel additional video discovery, and the defendants moved to extend the dispositive-motion deadline.
STANDARD OF REVIEW	The court applied a good-cause standard to the requested restriction on distribution of discovery materials and a relevance-and-scope analysis to the motion to compel.
PRECEDENTIAL VALUE	nonprecedential

TOPICS

- discovery dispute
- civil procedure
- prisoners rights

PRACTICE AREAS

- civil procedure
- prisoner civil rights
- discovery

QUESTIONS PRESENTED

1. Whether good cause supported restricting Washington's possession and distribution of videos produced in discovery.
2. Whether Washington was entitled to compel production of videos recorded after June 4, 2025.
3. Whether the defendants showed sufficient grounds for extending the dispositive-motion deadline.

HOLDINGS

1. The defendants showed good cause to prohibit Washington from distributing the videos to others, but did not show good cause to prohibit him from possessing or accessing them. Washington may possess the videos and use them in support of motions or responses, subject to any later showing of good cause for restricting public access.
2. The defendants were not required to produce videos recorded after June 4, 2025 because those materials were outside the temporal scope of Washington's claims and therefore irrelevant to the action.
3. The defendants' motion to extend the dispositive-motion deadline was granted, moving the deadline to June 11, 2026.

KEY QUOTATIONS

“The Court concludes that Defendants have shown good cause for an order restricting distribution of the videos, but they have not shown good cause for an order restricting Washington’s access to the videos.”

“According to Washington’s own allegations, any alleged violation after June 4, 2025 is outside the scope of this case, making the requested video irrelevant.”

FACTUAL BACKGROUND

Washington, an inmate at Waupun Correctional Institution, alleged that he was served food violating his religious beliefs and that the food was nutritionally inadequate from May 1 through June 4, 2025. The defendants produced documents and videos from the relevant period but objected to producing videos from after June 4, 2025. The defendants also sought to prevent Washington from retaining or distributing the videos because of asserted safety and security concerns.

PROCEDURAL HISTORY

Washington filed a pro se 42 U.S.C. § 1983 action concerning allegedly non-kosher and nutritionally inadequate food served between May 1 and June 4, 2025. After discovery closed, the defendants moved for restrictions on Washington's access to discovery videos, Washington moved to compel production of videos from after June 4, 2025, and the defendants moved to extend the dispositive-motion deadline. The court partially granted the video-restriction motion, denied the motion to compel, and granted the extension motion.

DISPOSITION

other

CASES CITED

- Baxter Intern., Inc. v. Abbott Laboratories, 297 F.3d 544, 548 (7th Cir. 2002)

OPINION

Simpson

PER CURIAM.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

TIRON WASHINGTON, JR.,

Plaintiff, v. Case No. 25-cv-0830-bhl SERGEANT SIMPSON et al., Defendants.

DECISION AND ORDER

Plaintiff Tiron Washington, Jr., is currently incarcerated at the Waupun Correctional Institution and representing himself in this 42 U.S.C. §1983 action. Washington alleges that from May 1, 2025 through June 4, 2025, he was served food that violated his religious beliefs and was nutritionally inadequate. Dkt. Nos. 1, 8. Discovery closed on March 23, 2026, and dispositive motions are due by April 22, 2026. On February 27, 2026, Defendants filed a motion for an order to restrict Washington's access to videos that Defendants had produced in response to Washington's discovery requests. Defendants ask that the videos be provided to the facility where Washington is housed and that Washington only be permitted to view the videos upon request rather than keep the videos in his property. Washington did not respond to the motion. On March 6, 2026, Washington filed a motion to compel. Defendants responded on March 27, 2026, asserting that all relevant documents and videos had been produced. Washington did not reply. On April 19, 2026, Defendants filed a motion to extend the dispositive motion deadline to June 10, 2026. Regarding Defendants' motion for an order restricting Washington's access to videos, the Court notes that Washington's possession of the videos does not appear to be of concern to Defendants; rather, Defendants' primary concern is that Washington will share the videos with others. Defendants describe various safety and security concerns that could arise if the videos were to be made publicly available. The Court concludes that Defendants have shown good cause for an order restricting distribution of the videos, but they have not shown good cause for an order restricting Washington's access to the videos. The Court will therefore deny Defendants' request for an order preventing Washington from possessing the videos. Instead, the Court will grant their motion in part and enter a protective order prohibiting Washington from distributing the videos to others, including to other inmates and news outlets. To be clear, Washington may file videos in support of motions he files and/or in support of his responses to motions. Videos used for such purposes will be publicly available unless a party shows good cause for restricting access to the videos. See Gen.

L. R. 79(d); see *Baxter Intern., Inc. v. Abbott Laboratories*, 297 F.3d 544, 548 (7th Cir. 2002) (acknowledging there is a strong presumption of public disclosure of materials that form the basis of the parties' dispute and the court's resolution). Next, the Court will deny Washington's motion to compel. The time period at issue in this case is narrow: May 1, 2025 through June 4, 2025. Defendants assert that they have provided Washington with all documents responsive to his requests. Moreover, they assert that they have produced videos from the timeframe at issue in this case. Defendants explain that they objected only to producing videos after the relevant timeframe. Washington acknowledges that Defendants have produced video from the relevant timeframe, but he asks the Court to order them to produce video from after that timeframe. Washington asserts that this video is relevant because it will demonstrate that the violations were ongoing. Washington brought this case on June 10, 2025, alleging that his rights were violated from May 1 through June 4, 2025, when he was repeatedly served non-kosher and/or nutritionally inadequate food. See Dkt. No. 1. Washington also alleged that, as of the time he filed his complaint, he was receiving pre-packaged kosher meals with a piece of fruit and slices of bread. According to Washington's own allegations, any alleged violation after June 4, 2025 is outside the scope of this case, making the requested video irrelevant. Therefore, Defendants need not produce video taken after June 4, 2025. Finally, the Court will grant Defendants' motion to extend the parties' dispositive motion deadline to June 11, 2026. Defendants vaguely explain that they "are in the process of trying to address and resolve some discovery issues." The Court encourages the parties to work together in good faith to promptly resolve those issues. Further extension of the dispositive motion deadline is unlikely absent a showing of extraordinary circumstances. IT IS THEREFORE ORDERED that Defendants' motion to restrict Washington's access to the video recordings (Dkt. No. 38) is GRANTED in part. Washington may possess the videos produced by Defendants; however, he may not share the videos with others. Washington may file the videos in support of motions or in support of his response to motions. IT IS FURTHER ORDERED that Washington's motion to compel (Dkt. No. 42) is DENIED. IT IS FURTHER ORDERED that Defendants' motion to extend the parties' dispositive motion deadline to June 11, 2026 (Dkt. No. 46) is GRANTED. Dated at Milwaukee, Wisconsin on April 20, 2026. s/ Brett H. Ludwig
BRETT H. LUDWIG
United States District Judge