

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NORTH
DAKOTA

Dr. Mary Logue v. Trinity Health

Logue · No. 1:24-cv-085 · Decided April 23, 2026

SUMMARY

The United States District Court for the District of North Dakota denied Trinity Health’s motion for leave to file exhibits under seal in connection with its motion for summary judgment. The court held that the public’s right of access to judicial records required a compelling, document-specific justification for sealing and that the defendant had not adequately addressed less restrictive alternatives such as redaction.

CASE DETAILS

COURT	United States District Court for the District of North Dakota
WRITING FOR THE COURT	Clare R. Hochhalter
JURISDICTION	United States District Court for the District of North Dakota
DECIDED	April 23, 2026
DOCKET	1:24-cv-085
DISPOSITION	other
PROCEDURAL POSTURE	Defendant moved for leave to file exhibits to its motion for summary judgment under seal. The court denied the motion.
STANDARD OF REVIEW	The decision whether to seal judicial records rests in the sound discretion of the trial court, subject to the public's common-law and qualified First Amendment rights of access.
PRECEDENTIAL VALUE	unpublished district court order

TOPICS

- summary judgment
- first amendment
- civil procedure

PRACTICE AREAS

- civil procedure
- constitutional law
- employment and civil rights

QUESTIONS PRESENTED

1. Whether Trinity Health demonstrated a compelling interest sufficient to overcome the public's common-law and qualified First Amendment right of access to exhibits filed in connection with a dispositive motion.
2. Whether the requested sealing was narrowly tailored and supported by a document-by-document analysis addressing less restrictive alternatives.

HOLDINGS

1. A party seeking to seal judicial records must demonstrate a compelling interest that overrides the public's qualified First Amendment right of access, explain why sealing is necessary, and show why less restrictive alternatives such as redaction are inadequate. The request must be narrowly tailored and supported by a detailed, document-by-document analysis.
2. The motion for leave to file the exhibits under seal was denied.

KEY QUOTATIONS

“A party seeking to seal a judicial record must demonstrate a compelling interest which overrides the qualified First Amendment right of public access enjoyed by the public and press.” (1)

“Therefore, the party seeking sealing must “analyze in detail, document by document, the propriety of secrecy, providing reasons and legal citations.”” (2)

“Defendant’s motion for leave to file under seal (Doc. No. 49) is therefore DENIED.” (3)

FACTUAL BACKGROUND

Trinity Health sought to seal exhibits to a deposition transcript filed in support of its motion for summary judgment. The proposed exhibits included physician service agreements, residency and loan documents, correspondence, and emails. Trinity Health relied substantially on confidentiality designations under a stipulated protective order but provided little explanation of why sealing was necessary or why redaction would not suffice.

PROCEDURAL HISTORY

Trinity Health filed a motion for summary judgment and supporting exhibits, including a deposition transcript and associated documents. It then moved for leave to file several exhibits under seal based primarily on their designation as confidential under a stipulated protective order. The district court denied the sealing motion because Defendant failed to demonstrate a compelling interest, analyze the documents individually, or address less restrictive alternatives such as redaction.

DISPOSITION

other

CASES CITED

- Nixon v. Warner Communications, Inc., 435 U.S. 589, 597 (1978)

- Webster Groves School District v. Pulitzer Publishing Co., 898 F.2d 1371, 1376 (8th Cir. 1990)
- United States v. McDougal, 103 F.3d 651, 658 (8th Cir. 1996)
- In re Search Warrant for Secretarial Area Outside Office of Gunn, 855 F.2d 569, 574 (8th Cir. 1988)
- Romero v. Drummond Co., 480 F.3d 1234, 1245 (11th Cir. 2007)
- Baxter International, Inc. v. Abbott Laboratories, 297 F.3d 544, 546, 548 (7th Cir. 2002)
- In re Neal, 461 F.3d 1048, 1053 (8th Cir. 2006)
- Shane Group, Inc. v. Blue Cross Blue Shield of Michigan, 825 F.3d 299, 305 (6th Cir. 2016)
- Press-Enterprise Co. v. Superior Court of California, 464 U.S. 501, 509-11 (1984)

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