

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEBRASKA

Jane Doe v. William Reese

Doe v. Reese · No. 8:26CV14 · Decided January 13, 2026

SUMMARY

The United States District Court for the District of Nebraska grants Plaintiff’s motions to proceed under the pseudonym Jane Doe and to file the civil cover sheet under seal. The court concludes that the sensitive and highly personal nature of the allegations, along with statutory provisions permitting anonymity, outweighs the countervailing interests at this stage. The ruling is subject to reconsideration after service of process if Defendant requests it.

CASE DETAILS

COURT	United States District Court for the District of Nebraska
WRITING FOR THE COURT	Ryan C. Carson
JURISDICTION	United States District Court for the District of Nebraska
DECIDED	January 13, 2026
DOCKET	8:26CV14
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved to proceed under the pseudonym Jane Doe and to file the civil cover sheet under seal before service of process on Defendant.
STANDARD OF REVIEW	A district court's decision to grant or deny a motion to proceed anonymously is reviewed for abuse of discretion.
PRECEDENTIAL VALUE	Unknown; district court order with no reporter citation or stated precedential designation.

TOPICS

- civil procedure
- pleadings
- invasion of privacy
- negligent infliction of emotional distress

PRACTICE AREAS

- civil procedure
- privacy
- personal injury

QUESTIONS PRESENTED

1. Whether Plaintiff should be permitted to proceed under the pseudonym Jane Doe.
2. Whether Plaintiff should be permitted to file the civil cover sheet under seal.

HOLDINGS

1. Plaintiff may proceed under the pseudonym Jane Doe because her need for anonymity, including the sensitive and highly personal sexual nature of the allegations and statutory authorization for pseudonymous litigation, outweighs the countervailing interests in disclosure at this stage.
2. The civil cover sheet may be filed under seal because requiring Plaintiff to publicly disclose her real identity on that form would defeat the purpose of allowing her to proceed under a pseudonym.

KEY QUOTATIONS

“a party may proceed under a fictitious name only in those limited circumstances where the party’s need for anonymity outweighs countervailing interests in full disclosure.”

“Because a district court must exercise discretion in the course of weighing competing interests, a district court’s decision to grant or deny a motion to proceed anonymously is reviewed for an abuse of discretion.”

FACTUAL BACKGROUND

Plaintiff alleged that Defendant disclosed intimate visual depictions of her without consent. The complaint asserted claims under 15 U.S.C. § 6851 et seq., Nebraska statutes governing the disclosure of intimate images and pseudonymous litigation, and common-law negligent infliction of emotional distress. Plaintiff alleged that the disclosures involved highly sensitive sexual matters and were especially offensive given her profession and reputation as a licensed in-home childcare provider.

PROCEDURAL HISTORY

Plaintiff filed a complaint alleging the nonconsensual disclosure of intimate visual depictions and related statutory and common-law claims. Before Defendant was served or appeared, Plaintiff moved to proceed under a pseudonym and to seal the civil cover sheet. The court granted both motions, subject to reconsideration at Defendant's request after service and appearance.

DISPOSITION

other

CASES CITED

- *Cajune v. Indep. Sch. Dist.* 194, 105 F.4th 1070, 1077-78 (8th Cir. 2024)
- *Cody v. City of St. Louis*, No. 4:17-CV-2707-AGF, 2022 WL 1202354, at *2 (E.D. Mo. Apr. 22, 2022)
- *Does I thru XXIII v. Advanced Textile Corp.*, 214 F.3d 1058, 1069 n.11 (9th Cir. 2000)

OPINION

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEBRASKA JANE DOE, Plaintiff, 8:26CV14 vs. ORDER WILLIAM REESE, Defendant. This matter comes before the court on Plaintiff's Motion to Proceed Under a Pseudonym (Filing No. 2) and Motion to File the Civil Cover Sheet under Seal. (Filing No. 5). Plaintiff's Complaint alleges that Defendant improperly disclosed intimate visual depictions of Plaintiff without her consent in violation of 15 U.S.C. § 6851 et seq., Neb. Rev. Stat. § 25-3501 et seq., and Neb. Rev. Stat. § 20-201 et seq.

She also alleges a common law claim for Negligent Infliction of Emotional Distress. (Filing No. 1). She requests permission to proceed in this action as "Jane Doe" due to the disclosure of sensitive and highly personal matters of a sexual nature. Courts "disfavor the use of fictitious names in legal proceedings," but the Eighth Circuit has held that "a party may proceed under a fictitious name only in those limited circumstances where the party's need for anonymity outweighs countervailing interests in full disclosure." *Cajune v. Indep.*

Sch. Dist. 194, 105 F.4th 1070, 1077 (8th Cir. 2024). The Eighth Circuit set forth non-exhaustive factors a district court should consider when determining whether a party may proceed anonymously. Factors weighing in favor of party anonymity include: (1) whether "the party seeking anonymity is challenging government activity"; (2) whether "identification threaten[s] to reveal information of a sensitive and highly personal nature"; (3) whether "a party would be required, absent anonymity, to admit an intention to engage in illegal conduct, thereby risking criminal prosecution"; and (4) whether there is a "danger of retaliation," which is "often a compelling ground" in favor of anonymity.

Id. (internal quotation omitted). Factors weighing against party anonymity include: (1) whether the party's requested anonymity "poses a unique threat of fundamental unfairness to the defendant"; (2) whether "the public's interest in the case is furthered by requiring that the litigants disclose their identities"; and whether "there exist alternative mechanisms that could protect the confidentiality of the litigants." *Id.* (citations omitted). "Because a district court must exercise discretion in the course of weighing competing interests," a district court's decision to grant or deny a motion to proceed anonymously is reviewed for an abuse of discretion.

Id. at 1077-78. After review of the complaint and in consideration of the above factors, the court finds that Plaintiff may proceed under a pseudonym at this time. As Plaintiff indicates, Count I and Count II of her complaint both explicitly allow Plaintiff to proceed under a pseudonym to protect her anonymity. (See 15 U.S.C. § 6851(b)(3)(B) and Neb. Rev. Stat. § 25-3509).

The Complaint contains many allegations of a highly sensitive and sexual nature, including that such disclosure of intimate visual depictions is "especially offensive to Doe given her profession and reputation as a licensed, in-home childcare provider." (Filing No. 1, at para. 113). Plaintiff further states that her complaint is sufficiently detailed such that "Defendant can readily and easily ascertain the identity of Plaintiff and there is neither any threat of fundamental unfairness to

Defendant or detriment to the public's interest in Plaintiff is permitted to proceed under a pseudonym." (Filing No. 2, at para. 7).

See *Cody v. City of St. Louis*, No. 4:17-CV-2707-AGF, 2022 WL 1202354 *2 (E.D. Mo. Apr. 22, 2022) (stating the defendants' knowledge of the plaintiffs' identities "lessens their claims to be prejudiced by the use of pseudonyms") (quoting *Does I thru XXIII v. Advanced Textile Corp.*, 214 F.3d 1058, 1069 n.11 (9th Cir. 2000)). Given the above, the court will grant Plaintiff's motion to proceed under a pseudonym.

Plaintiff also moves to file her Civil Cover Sheet under seal. (Filing No. 5). Plaintiff recognizes the need to provide her real identity to the court for purposes of litigation and intends to include that name in her Civil Cover Sheet.

The court agrees that if the Civil Cover Sheet were not filed under seal, it would defeat the purposes of proceeding under a pseudonym. Accordingly, that motion is also granted. The court is entering this Order prior to service of process upon the Defendant and without the benefit of hearing the Defendant's position on the matter.

As such, this decision shall be subject to reconsideration, if requested, after the Defendant is served with process and has entered an appearance in this case. Accordingly, IT IS ORDERED that: 1. Plaintiff's Motion to Proceed under a Pseudonym is granted. (Filing No. 2). Plaintiff may proceed under the pseudonym Jane Doe. This decision shall be subject to reconsideration if this matter proceeds to service of process and if the Defendant so requests.

2. Plaintiff's Motion to file the Civil Cover Sheet under Seal is granted. (Filing No. 5). Dated this 13th day of January, 2026. BY THE COURT: s/ Ryan C. Carson United States Magistrate Judge