

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
LOUISIANA, LAFAYETTE DIVISION

Nikita Smith v. David Leonard Jr. et al.

Smith v. Leonard · No. 6:24-CV-01192 · Decided January 28, 2026

SUMMARY

In this memorandum order, the United States District Court for the Western District of Louisiana denied Defendants’ motion to seal exhibits filed with their motion for summary judgment. The court held that Defendants had not substantiated a confidentiality justification or shown that the law enforcement privilege applied, and permitted the exhibits to be filed with redactions under Local Rule 5.7.12.

CASE DETAILS

COURT	United States District Court for the Western District of Louisiana, Lafayette Division
WRITING FOR THE COURT	Carol B. Whitehurst
JURISDICTION	United States District Court for the Western District of Louisiana
DECIDED	January 28, 2026
DOCKET	6:24-CV-01192
DISPOSITION	other
PROCEDURAL POSTURE	Defendants moved to file exhibits supporting their motion for summary judgment under seal. The motion was referred to Magistrate Judge Carol B. Whitehurst for determination.
STANDARD OF REVIEW	A court must apply a strict, case-by-case, document-by-document, and line-by-line balancing of the public's common-law right of access to judicial records against interests favoring nondisclosure; sealing decisions are reviewed for abuse of discretion.
PRECEDENTIAL VALUE	Unknown; memorandum order from a federal district court.
PARTIES	Nikita Smith v. David Leonard Jr. et al.

TOPICS

- civil procedure
- summary judgment
- public records
- open government
- government liability

PRACTICE AREAS

civil procedure

civil rights

government liability

QUESTIONS PRESENTED

1. Whether defendants established sufficient grounds to file arrest-related exhibits supporting their summary-judgment motion under seal.
2. Whether a federal law-enforcement privilege justified sealing court records after the underlying criminal matter had concluded.

HOLDINGS

1. Defendants did not establish sufficient grounds to overcome the presumption of public access to judicial records, so their motion to file the four exhibits under seal was denied.
2. The potential federal law-enforcement privilege did not justify sealing the exhibits because the criminal matter had concluded and defendants did not demonstrate that the privilege applied to these court records.

KEY QUOTATIONS

“Sealings must be explained at a level of detail that will allow for this Court’s review.” (418-20)

FACTUAL BACKGROUND

Defendants sought to seal an arresting officer's affidavit, the officer's deposition, an arrest warrant, and a police-department booking sheet. The documents concerned the arrest underlying Plaintiff's civil suit, and Defendants asserted that the criminal matter had concluded. Neither party provided substantiating argument explaining why the documents were confidential, and the court found no justification beyond the possible application of a federal law-enforcement privilege.

PROCEDURAL HISTORY

Plaintiff brought a civil-rights action arising from his arrest. Defendants filed a motion for summary judgment and sought leave to file four arrest-related exhibits under seal pursuant to a joint protective order. The court denied the sealing motion and permitted defendants to file the exhibits with redactions complying with Local Rule 5.7.12.

DISPOSITION

other

CASES CITED

- *Binh Hoa Le v. Exeter Fin. Corp.*, 990 F.3d 410, 418, 419-20 (5th Cir. 2021)
- *In re U.S. Dep't of Homeland Sec.*, 459 F.3d 565, 570-71 (5th Cir. 2006)
- *In re Sealing & Non-Disclosure of Pen/Trap/2703(d) Ords.*, 562 F. Supp. 2d 876, 885 (S.D. Tex. 2008)

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