

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
WASHINGTON

Caryn Jennings et al. v. USAA Casualty Insurance Company et al.

Jennings · No. 3:23-cv-06171-DGE · Decided January 30, 2026

SUMMARY

The United States District Court for the Western District of Washington grants seven motions to seal materials in a class action concerning USAA’s handling of personal injury protection and medical payments claims. The Court finds compelling reasons to seal or redact trade secrets, proprietary claims-processing information, contractual and pricing information, and plaintiffs’ medical and personally identifying information.

CASE DETAILS

COURT	United States District Court for the Western District of Washington
WRITING FOR THE COURT	David G. Estudillo
JURISDICTION	United States District Court for the Western District of Washington
DECIDED	January 30, 2026
DOCKET	3:23-cv-06171-DGE
DISPOSITION	other
PROCEDURAL POSTURE	Order resolving multiple motions by the parties and a non-party to seal or redact judicial records filed in connection with class-certification, summary-judgment, and expert-report proceedings.
STANDARD OF REVIEW	Motions to seal are evaluated under the strong presumption of public access to judicial records. For records relevant to the merits, a party must demonstrate compelling reasons supported by specific factual findings, and must explain the interests supporting sealing, the injury from disclosure, and why a less restrictive alternative is inadequate.
PRECEDENTIAL VALUE	Unknown; district court order resolving motions to seal.
PARTIES	Caryn Jennings, Tricia Harder v. USAA Casualty Insurance Company, USAA General Indemnity Company

TOPICS

- civil procedure
- commercial litigation
- insurance
- medical records privacy
- class actions

PRACTICE AREAS

civil procedure

insurance

commercial litigation

health law

QUESTIONS PRESENTED

1. Whether Defendants established compelling reasons to seal or redact materials containing trade secrets, proprietary MBA-process information, internal claims-processing rules, contractual terms, pricing information, business strategies, and information-security details.
2. Whether Plaintiffs and Defendants established compelling reasons to seal or redact personally identifying information, medical information, descriptions of medical services and diagnoses, and USAA member numbers.
3. Whether the parties' proposed sealing and redaction requests complied with Local Civil Rule 5(g), including the requirement to use less restrictive alternatives where feasible.

HOLDINGS

1. A party seeking to seal judicial records must overcome the strong presumption of public access by showing compelling reasons supported by a specific factual basis, while explaining the relevant interests, the harm from disclosure, and why a less restrictive alternative is insufficient.
2. Compelling reasons supported sealing or redacting materials revealing USAA's MBA process, taxonomy, claims-processing rules, internal training materials, contractual terms, pricing information, business strategies, and information-security details.
3. Compelling reasons supported sealing or redacting plaintiffs' medical information, descriptions of medical services and diagnoses, personally identifying information, and USAA member numbers.

KEY QUOTATIONS

“There is a strong presumption of public access to the court’s files.” (II, lines 11–15)

“a party seeking to seal a judicial record then bears the burden of overcoming this strong presumption by meeting the ‘compelling reasons’ standard.” (II, lines 20–24)

“Here, the Court finds compelling reasons exist to maintain under seal information related to the Taxonomy given the potential harm revealing information about USAA’s internal process for evaluating claims would have with respect to USAA’s competitive standing.” (III.A.1, lines 21–23)

FACTUAL BACKGROUND

Plaintiffs allege that USAA used a largely automated Medical Bill Audit process developed with AIS, now CCC Intelligent Solutions, to evaluate and reduce or deny PIP and MedPay claims. The sealing motions concerned materials describing the MBA process, its taxonomy and operating rules, contractual and pricing terms, internal training and claims-processing systems, business strategies, and personal and medical information belonging to plaintiffs. The court reviewed the asserted confidentiality interests and the proposed redactions or sealing requests.

PROCEDURAL HISTORY

Plaintiffs filed a putative class action in Clark County Superior Court alleging that USAA improperly reduced or denied PIP and MedPay claims through an automated medical-bill-audit process operated with AIS. The action was removed to the Western District of Washington. After the court denied an earlier sealing motion and required more particularized sealing requests, Defendants, Plaintiffs, and non-party CCC filed the motions addressed in this order. The court granted all seven motions and directed the parties to file missing sealed and redacted versions within ten days.

DISPOSITION

other

CASES CITED

- *Kamakana v. City & County of Honolulu*, 447 F.3d 1172, 1178–79 (9th Cir. 2006)
- *Ctr. for Auto Safety v. Chrysler Grp., LLC*, 809 F.3d 1092, 1096–97 (9th Cir. 2016)
- *Foltz v. State Farm Mut. Auto. Ins. Co.*, 331 F.3d 1122, 1135 (9th Cir. 2003)
- *Nixon v. Warner Communications, Inc.*, 435 U.S. 589, 598–99 (1978)
- *In re Apple Inc. Device Performance Litigation*, Case No. 5:18-MD-02827-EJD, 2019 WL 1767158, at *2 (N.D. Cal. Apr. 22, 2019)
- *Transperfect Glob., Inc. v. Motionpoint Corp.*, Case No. C 10-2590 CW, 2013 WL 209678, at *1 (N.D. Cal. Jan. 17, 2013)
- *Nautilus Biotechnology, Inc. v. SomaLogic, Inc.*, Case No. 23-CV-06440-BLF, 2024 WL 4894852, at *2 (N.D. Cal. Nov. 26, 2024)
- *Music Grp. Macao Com. Offshore Ltd. v. Foote*, Case No. 14-cv-03078-JSC, 2015 WL 3993147, at *6 (N.D. Cal. June 30, 2015)
- *Virun, Inc. v. Cymbiotika, LLC*, Case No. 8:22-cv-00325-SSS-DFMx, 2022 WL 17401698, at *2 (C.D. Cal. Aug. 19, 2022)
- *Quidel Corp. v. Siemens Med. Solutions USA, Inc.*, Case No. 16-cv-3059-BAS-AGS, 2020 WL 1062949, at *2 (S.D. Cal. Mar. 4, 2020)
- *HSBC Bank USA, Nat'l Ass'n v. Chi. Title Ins. Co.*, Case No. 2:18-cv-02162-MMD-DJA, 2023 WL 6723619, at *2 (D. Nev. Oct. 11, 2023)
- *Aguilar v. Koehn*, Case No. 3:16-CV-0529-MMD-CBC, 2018 WL 4839021, at *2 (D. Nev. Oct. 4, 2018)
- *UnifySCC v. Cody*, Case No. 5:22-cv-01019-BLF, 2024 WL 4752092, at *2 (N.D. Cal. Oct. 24, 2024)