

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
ILLINOIS

Pablo Torres v. Dylan Willis, et al.

Torres · No. 3:24-CV-300-MAB · Decided January 28, 2026

SUMMARY

The United States District Court for the Southern District of Illinois denied Pablo Torres’s motion to maintain the case under seal. The court held that his unsupported concerns about retaliation and prior threats did not overcome the strong presumption favoring public access to judicial proceedings, particularly because he had been transferred and the relevant information was already known or publicly available. The Clerk was directed to unseal the case and all sealed filings.

CASE DETAILS

COURT	United States District Court for the Southern District of Illinois
WRITING FOR THE COURT	Mark A. Beatty
JURISDICTION	United States District Court for the Southern District of Illinois
DECIDED	January 28, 2026
DOCKET	3:24-CV-300-MAB
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved to maintain the entire case under seal after the court had previously allowed the case to proceed under seal while John Doe defendants were identified and served. The defendants opposed the renewed motion.
STANDARD OF REVIEW	The court applied the strong presumption favoring public access to judicial proceedings and required Plaintiff to show exceptional or extraordinary circumstances demonstrating that his need for anonymity or sealing outweighed the harm of concealment.
PRECEDENTIAL VALUE	unpublished
PARTIES	Pablo Torres v. Dylan Willis, et al.

TOPICS

- civil procedure
- prisoners rights
- civil rights
- open government

PRACTICE AREAS

civil procedure

civil rights

prisoners rights

QUESTIONS PRESENTED

1. Whether Plaintiff demonstrated sufficient ongoing danger or other exceptional circumstances to overcome the strong presumption of public access and maintain the entire case under seal.
2. Whether sealing the case would provide a practical safety benefit when Plaintiff's identity and location were already known or publicly available.

HOLDINGS

1. A party seeking to maintain an entire case under seal must overcome the strong presumption favoring public access by demonstrating exceptional or extraordinary circumstances that make sealing necessary; unsupported fears of retaliation and generalized safety concerns are insufficient.
2. A motion to seal the entire case fails when the movant does not explain how sealing would protect information that is already known to the alleged threats or publicly available from other sources.

KEY QUOTATIONS

“Redacting portions of opinions is one thing, secret disposition is quite another. We have insisted that litigation be conducted in public to the maximum extent consistent with respecting trade secrets, the identities of undercover agents, and other facts that should be held in confidence.” (at 2)

“Under the current standard, a plaintiff wishing to proceed anonymously must rebut the presumption that parties’ identities are public information by showing that her need for anonymity outweighs the harm of concealment.” (at 3)

FACTUAL BACKGROUND

Plaintiff, an inmate, claimed that he faced retaliation from Illinois Department of Corrections employees because he sued prison officials. He also alleged that rival gang members had previously threatened and assaulted him based on events underlying the lawsuit, but he had since been transferred to another facility. Plaintiff did not identify any specific ongoing threat or harm after the transfer, show that available prison safety mechanisms had been attempted and were inadequate, or explain how sealing the case would protect information already known or publicly available.

PROCEDURAL HISTORY

The court initially permitted the action to proceed under seal while deferring a ruling on Plaintiff's request to proceed under a pseudonym. After the John Doe defendants were identified and served, the court granted Plaintiff leave to file a renewed motion addressing the continuing need for sealing or pseudonymous litigation. Plaintiff filed the renewed motion, Defendants opposed it, and the court denied the motion and directed the Clerk to unseal the case and all sealed filings.

DISPOSITION

other

CASES CITED

- Doe v. Village of Deerfield, 819 F.3d 372, 377 (7th Cir. 2016)
- Hicklin Eng'g, L.C. v. Bartell, 439 F.3d 346, 348-49 (7th Cir. 2006)
- Mitze v. Saul, 968 F.3d 689, 692 (7th Cir. 2020)
- Morgan v. Indiana Dep't of Correction, 2:24-CV-00336-JPH-MKK, 2024 WL 3757137, at *1 (S.D. Ind. Aug. 12, 2024)
- Mikhail v. Manchester Univ., Inc., 1:17-CV-269-HAB, 2022 WL 872731, at *2 (N.D. Ind. Mar. 24, 2022)
- Prude v. Dixon, 23-CV-1233, 2024 WL 4581292, at *1 (E.D. Wis. Oct. 24, 2024)

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