

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
LOUISIANA

Willie Banks, et al. v. St. James Parish School Board, et al.

Civil Action No. 65-16173, Section "P" (2) · No. Civil Action No. 65-16173 · Decided April 16, 2026

SUMMARY

The United States District Court for the Eastern District of Louisiana addresses Plaintiffs Miyoka Johnson and Rhoda Johnson’s motion to file deposition excerpts under seal based on purported FERPA protections. The court holds that Plaintiffs failed to justify wholesale sealing and that FERPA does not protect records relating to school employees. The motion is granted in part and denied in part, with leave to file redacted versions concealing specified nonparty employee names and initials.

CASE DETAILS

COURT	United States District Court for the Eastern District of Louisiana
JURISDICTION	United States District Court for the Eastern District of Louisiana
DECIDED	April 16, 2026
DOCKET	Civil Action No. 65-16173
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiffs Miyoka Johnson and Rhoda Johnson moved ex parte for leave to file deposition excerpts under seal pursuant to Eastern District of Louisiana Local Rule 5.6. The court granted the motion in part and denied it in part.
STANDARD OF REVIEW	The court applied the common-law presumption of public access to judicial records and reviewed the sealing request under an abuse-of-discretion framework informed by the requirement of document-by-document and line-by-line balancing.
PRECEDENTIAL VALUE	Unknown; district court order addressing a motion to seal in the individual case.
PARTIES	Miyoka Johnson, Rhoda Johnson, Willie Banks, et al. v. St. James Parish School Board, et al.

TOPICS

- public records
- civil procedure

PRACTICE AREAS

civil procedure

privacy and confidentiality

education law

QUESTIONS PRESENTED

1. Whether Plaintiffs established sufficient grounds to file Exhibits A and C entirely under seal despite the presumption of public access to judicial records.
2. Whether FERPA protects personally identifiable information concerning employees of an educational institution in deposition excerpts.
3. Whether the exhibits should instead be publicly filed with redactions limited to irrelevant nonparty employee names and initials.

HOLDINGS

1. Plaintiffs did not overcome the presumption of public access because they sought wholesale sealing without conducting the required document-by-document and line-by-line analysis or identifying the specific harm that disclosure would cause.
2. The deposition excerpts concerning school-district employees were not education records protected by FERPA, and FERPA did not provide a basis for sealing the employee information.
3. The court permitted Plaintiffs to refile Exhibits A and C with only the specified nonparty employee names and initials redacted because those identities were irrelevant to the motion and the case generally, and the employees' privacy interest outweighed the public's interest in disclosure of their names.

KEY QUOTATIONS

“Because the sealing of judicial records is the exception rather than the norm, the court must be “ungenerous” with its discretion to seal judicial records.” (I)

“The deposition excerpts at issue do not qualify as education records and are not entitled to FERPA protections.” (II)

“Plaintiffs must submit redacted versions of Exhibits A and C consistent with this Court’s opinion, which redacted versions will be filed in the court record with unredacted copies filed under seal.” (Conclusion)

FACTUAL BACKGROUND

Plaintiffs Miyoka Johnson and Rhoda Johnson cited deposition excerpts of St. James Parish School District employees in their opposition memorandum and sought to file the excerpts under seal. They asserted that the excerpts contained personally identifiable information protected by FERPA. The excerpts identified nonparty district employees by names or initials, but those identities were not used in the parties' filings and appeared irrelevant to the motion and case generally.

PROCEDURAL HISTORY

In the pending civil action, Plaintiffs sought to file Exhibits A and C under seal, asserting that deposition excerpts of school-district employees contained personally identifiable information protected by FERPA and a

protective order. The court found that Plaintiffs had not justified wholesale sealing, but permitted redaction of specified nonparty employee names and initials before filing the exhibits publicly, with unredacted copies filed under seal.

DISPOSITION

other

CASES CITED

- 8fig, Inc. v. Stepup Funny, L.L.C., 135 F.4th 285, 293 (5th Cir. 2025)
- Binh Hoa Le v. Exeter Fin. Corp., 990 F.3d 410, 418-21 (5th Cir. 2021)
- June Med. Servs., L.L.C. v. Phillips, 22 F.4th 512, 519-21 (5th Cir. 2022)
- United States v. Ahsani, 76 F.4th 441, 452 (5th Cir. 2023)
- S.E.C. v. Van Waeyenberghe, 990 F.2d 845, 848 (5th Cir. 1993)
- N. Cypress Med. Ctr. Operating Co. v. Cigna Healthcare, 781 F.3d 182, 204 (5th Cir. 2015)
- Ruby Slipper Cafe, LLC v. Belou, No. 18-1548, 2020 WL 4897905, at *9 (E.D. La. Jan. 8, 2020)
- Westside-Marrero Jeep Eagle, Inc. v. Chrysler Corp., No. 97-3012, 1998 WL 186728, at *1 (E.D. La. Apr. 17, 1998)
- Doe v. Crawford, 702 F. Supp. 3d 509, 513 (S.D. Miss. 2023)
- St. Charles-Guillot Inv., LLC v. One Source Roofing, Inc., No. 23-30, 2024 WL 5440833, at *2 (E.D. La. Oct. 21, 2024)
- Weiss v. Allstate Ins. Co., No. 06-3774, 2007 WL 2377119, at *4 (E.D. La. Aug. 16, 2007)
- Leucadia, Inc. v. Applied Extrusion Techs., Inc., 998 F.2d 157, 165 (3d Cir. 1993)
- Marcus v. St. Tammany Par. Sch. Bd., No. 95-3140, 1997 WL 313418, at *5 (E.D. La. June 9, 1997)
- BP Expl. & Prod., Inc. v. Claimant ID 100246928, 920 F.3d 209, 211 (5th Cir. 2019)
- Omega Hosp., LLC v. Cmty. Ins. Co., No. 14-2264, 2015 WL 13534251, at *4 (E.D. La. Aug. 12, 2015)
- United States v. Planned Parenthood Fed'n of Am., No. 21-22, 2023 WL 8116198, at *4 (N.D. Tex. Aug. 4, 2023)
- Trans Tool, LLC v. All State Gear Inc., No. 19-1304, 2022 WL 608945, at *6, *9 (W.D. Tex. Mar. 1, 2022)
- I F G Port Holdings, L.L.C. v. Lake Charles Harbor & Terminal Dist., 82 F.4th 402, 411-12 (5th Cir. 2023)
- Vantage Health Plan, Inc. v. Willis-Knighton Med. Ctr., 913 F.3d 443, 451 (5th Cir. 2019)
- Klein v. Indep. Sch. Dist. v. Mattox, 830 F.2d 576, 579 (5th Cir. 1987)
- Daywalker v. Univ. of Tex. Med. Branch at Galveston, No. 20-99, 2021 WL 4099827, at *2 (S.D. Tex. Sept. 9, 2021)
- Student Press L. Ctr. v. Alexander, 778 F. Supp. 1227, 1228 (D.D.C. 1991)
- Ellis v. Cleveland Mun. Sch. Dist., 390 F. Supp. 2d 1019, 1022 (N.D. Ohio 2005)
- Bauer v. Kincaid, 759 F. Supp. 575, 591 (W.D. Mo. 1991)
- Carter v. Sw. Airlines Co., No. 17-2278, 2022 WL 283025, at *2-4 (N.D. Tex. Jan. 31, 2022)

- Durham v. Ankura Consulting Grp., LLC, No. 20-112, 2023 WL 3590693, at *6 & n.9 (S.D. Miss. May 22, 2023)
- Wilprit v. Cap. One Bank USA, N.A., No. 22-452, 2024 WL 1048137, at *4 (N.D. Tex. Mar. 11, 2024)

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