

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Ibn Williams v. Coppin State University, et al.

Williams v. Coppin State University · No. 23-2590-JRR · Decided January 15, 2026

SUMMARY

The court addresses Plaintiff Ibn Williams’s motion to compel production of a memorandum concerning a Title IX claim that Defendants withheld based on attorney-client privilege and work-product protection. Finding a sufficient factual basis for the asserted protections but also indications that the memorandum may contain severable nonprivileged material or relate to a disclosed investigative summary, the court orders Defendants to submit the memorandum for in camera review.

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	Douglas R. Miller
JURISDICTION	United States District Court for the District of Maryland
DECIDED	January 15, 2026
DOCKET	23-2590-JRR
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved to compel production of a memorandum withheld on attorney-client privilege and attorney work-product grounds. The court ordered the defendants to submit the memorandum for in camera review.
STANDARD OF REVIEW	The court applied the standard governing in camera review of documents claimed to be protected by attorney-client privilege or the attorney work-product doctrine: the asserting party must provide sufficient factual information and an evidentiary basis to support each claimed protection, and the court must find a factual basis adequate to support a good-faith belief that in camera review may reveal evidence establishing the claim.
PRECEDENTIAL VALUE	unpublished

TOPICS

- discovery dispute
- attorney client privilege
- work product doctrine
- civil procedure
- evidence

PRACTICE AREAS

civil procedure

evidence

civil rights

QUESTIONS PRESENTED

1. Whether defendants established a sufficient factual basis for the court to conduct in camera review of the withheld Title IX Legal Analysis claimed to be protected by attorney-client privilege and the work-product doctrine.
2. Whether plaintiff's evidence created a good-faith basis to determine through in camera review whether the document contained severable nonprivileged material or was part of a single analysis whose subject matter may have been disclosed through CSU's production and adoption of the Investigative Summary.

HOLDINGS

1. Defendants made a sufficient factual showing to support a good-faith belief that in camera review of the Title IX Legal Analysis may reveal evidence establishing the asserted attorney-client privilege or work-product protection.
2. Because plaintiff identified evidence suggesting that the two Ogletree documents could constitute a single analysis or contain severable nonprivileged material, the court ordered defendants to submit the Title IX Legal Analysis for in camera review before determining whether any portion should be disclosed.

KEY QUOTATIONS

“the court should never be required to undertake in camera review unless the parties have first properly asserted privilege/protection, then provided sufficient factual information to justify the privilege/protection claimed for each document or category of document, and, finally, met and conferred in a good faith effort to resolve any disputes without court intervention.” (Legal Standard)

“Accordingly, in order for the Court to determine whether the Title IX Legal Analysis contains any non-privileged, non-protected information that may be severed and disclosed, it is this 15th day of January, 2026, hereby ORDERED that Defendants shall submit the Title IX Legal Analysis for in camera review.”
(Conclusion and Order)

FACTUAL BACKGROUND

Coppin State University retained Ogletree Deakins in connection with plaintiff's Title IX complaint, which was accompanied by a \$50 million Notice of Claim. Ogletree prepared both an Investigative Summary, which CSU disclosed to plaintiff and adopted in closing the complaint, and the withheld Title IX Legal Analysis. Defendants asserted that the documents were separate deliverables consisting respectively of a nonprivileged investigation and privileged legal advice, while plaintiff pointed to the engagement documents, billing records, and emails as evidence that the work was a single investigative task and that any privilege had been waived.

PROCEDURAL HISTORY

Plaintiff brought litigation arising from Coppin State University's handling of his Title IX complaint. During discovery, defendants withheld a nine-page document titled "Attorney Legal Analysis of Title IX Claim," and plaintiff moved to compel its production. After reviewing the parties' submissions and sealed exhibits, the magistrate judge ordered defendants to submit the document for in camera review rather than ruling finally on privilege or work-product protection.

DISPOSITION

other

CASES CITED

- Black & Decker Corp. v. United States, 219 F.R.D. 87, 90 (D. Md. 2003)
- Hall v. Baltimore Police Dep't, No. RDB-24-1137, 2025 WL 1024069, at *1 (D. Md. Mar. 31, 2025)
- Faller v. Faller, No. DKC-09-0889, 2010 WL 3834865, at *9 (D. Md. Sept. 28, 2010)
- Victor Stanley, Inc. v. Creative Pipe, Inc., 250 F.R.D. 251, 266-67 (D. Md. 2008)
- Prowess, Inc. v. RaySearch Labs. AB, No. WDQ-11-1357, 2013 WL 509021, at *1 n.2 (D. Md. Feb. 11, 2013)
- Fed. Election Comm'n v. Christian Coal., 178 F.R.D. 61, 74 (E.D. Va.), order aff'd in part, modified in part, 178 F.R.D. 456 (E.D. Va. 1998)
- In re Royal Ahold N.V. Sec. & ERISA Litig., 230 F.R.D. 433, 436 (D. Md. 2005)

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