

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
OHIO, EASTERN DIVISION

June Carey Moore v. CHSI EMP LLC

Moore · No. 1:25-CV-238 · Decided March 25, 2026

SUMMARY

The United States District Court for the Northern District of Ohio granted in part and denied in part Plaintiff June Carey Moore’s motion to compel discovery in her Fair Labor Standards Act overtime action against CHSI EMP LLC. The court ordered production of unredacted patient-related records under a protective order, concluding that disclosure was authorized for good cause under 42 U.S.C. § 290dd-2, but denied the request concerning additional defense documents and declined to impose discovery sanctions.

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio, Eastern Division
WRITING FOR THE COURT	Jennifer Dowdell Armstrong
JURISDICTION	United States District Court for the Northern District of Ohio, Eastern Division
DECIDED	March 25, 2026
DOCKET	1:25-CV-238
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved to compel discovery and requested discovery sanctions in an action alleging unpaid overtime under the Fair Labor Standards Act.
STANDARD OF REVIEW	The court applied the discovery relevance and undue-burden standards under Federal Rule of Civil Procedure 26 and reviewed the motion to compel under Rule 37; discovery rulings and sanctions determinations are committed to the court's discretion.
PRECEDENTIAL VALUE	unknown
PARTIES	June Carey Moore v. CHSI EMP LLC

TOPICS

discovery dispute

hipaa

medical records privacy

flsa

civil procedure

PRACTICE AREAS

civil procedure

employment law

health law

Fair Labor Standards Act

QUESTIONS PRESENTED

1. Whether CHSI must produce unredacted patient names and dates of service contained in relevant records under the confidentiality protections of 42 U.S.C. § 290dd-2.
2. Whether Moore was entitled to an order compelling CHSI to respond further to her request for all documents supporting CHSI's defenses.
3. Whether discovery sanctions, including expenses or attorney fees, were warranted based on CHSI's objections and discovery responses.

HOLDINGS

1. Good cause existed under 42 U.S.C. § 290dd-2(b)(2)(C) to order CHSI to disclose the unredacted patient names and dates of service in the specified records, subject to a protective order and appropriate safeguards.
2. Moore was not entitled to an order compelling further production on her request for all documents on which CHSI based any defense because CHSI represented that it was not currently aware of other responsive documents, and Moore effectively conceded that there was nothing further to compel.
3. Discovery sanctions were not warranted because CHSI's objection to producing unredacted patient names was substantially justified and its handling of the sixth production request was not sufficiently egregious.

KEY QUOTATIONS

"After careful consideration, the Court finds that Ms. Moore has shown "good cause" to obtain an order requiring disclosure here." (Section IV.A)

"The Court does not see how the residents' privacy interest could not be adequately addressed, then, by referring to residents by initials only (or by a generic term like "Patient 1" and "Patient 2")." (Section IV.A)

"Reasonable people could differ as to the appropriateness of disclosing the unredacted patient names." (Section IV.C)

FACTUAL BACKGROUND

CHSI employed Moore as a mobile case manager and licensed chemical dependency counselor providing substance-use counseling services. Moore alleged that she regularly worked more than forty hours per week without receiving all required overtime compensation and maintained physical and electronic notes concerning some work hours, patients, and services. During discovery, CHSI produced emails and other records with nonparty patient names redacted, and Moore sought production of the unredacted names to compare CHSI's records with her own notes.

PROCEDURAL HISTORY

Moore filed an FLSA complaint against CHSI alleging that she worked unpaid overtime from November 2021 through March 2023. After the parties exchanged written discovery and failed to resolve a dispute concerning redacted patient names and a request for documents supporting CHSI's defenses, Moore moved to compel and sought sanctions. The court granted the motion in part, ordered production of specified unredacted records subject to a HIPAA-qualified protective order, denied relief concerning the sixth production request, and declined to impose sanctions.

DISPOSITION

other

REMAND INSTRUCTIONS

The parties were ordered to confer and file a joint proposed HIPAA-qualified protective order within fourteen days. If they could not agree on all terms, they were ordered to file a notice identifying the areas of disagreement and each party's position. Within fourteen days after entry of the protective order, CHSI was ordered to produce unredacted copies of Bates-stamped documents CHSI EMP 00223, 00224, 00232, 00233, 00236, 00237, and 00238.

CASES CITED

- *White v. City of Cleveland*, 417 F. Supp. 3d 896, 902 (N.D. Ohio 2019)
- *CSX Transportation, Inc. v. Columbus Downtown Development Corp.*, No. 2:16-cv-557, 2019 WL 1760069, at *4 (S.D. Ohio Apr. 22, 2019)
- *James v. Cuyahoga County*, 648 F. Supp. 3d 897, 903–04 (N.D. Ohio 2022)
- *Fannon v. Johnston*, 88 F. Supp. 2d 753, 759 (E.D. Mich. 2000)
- *Hughes v. City of Louisville*, No. 3:02CV-60-S, 2005 WL 8174380, at *6 (W.D. Ky. Jan. 12, 2005)
- *Roe v. Planned Parenthood Southwest Ohio Region*, 912 N.E.2d 61, 67, 71 (Ohio 2009)
- *Biddle v. Warren General Hospital*, 715 N.E.2d 518, 523 (Ohio 1999)
- *First Bank of Marietta v. Hartford Underwriters Insurance Co.*, 307 F.3d 501, 510 (6th Cir. 2002)
- *Doe v. Lexington-Fayette Urban County Government*, 407 F.3d 755, 766 (6th Cir. 2005)
- *Pierce v. Underwood*, 487 U.S. 552, 565, 108 S. Ct. 2541, 101 L. Ed. 2d 490 (1988)