

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Jane Doe (T.R.S.) v. Wyndham Hotels and Resorts, Inc., et al.

Case No. 2:23-cv-01676-DAD-CSK (E.D. Cal. Oct. 8, 2025) · No. 2:23-cv-01676-DAD-CSK · Decided October 8, 2025

SUMMARY

The United States District Court for the Eastern District of California grants Jane Doe’s unopposed motion to proceed under a pseudonym through pretrial proceedings. The court grants in part and denies in part her motion for a protective order concerning disclosure of her identity, requiring a modified acknowledgment for non-party fact witnesses and their counsel. The parties must meet and confer and submit a modified protective order within fourteen days.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Chi Soo Kim
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	October 8, 2025
DOCKET	2:23-cv-01676-DAD-CSK
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved for a protective order and to proceed under a pseudonym during pretrial proceedings.
STANDARD OF REVIEW	The district court has broad discretion to determine whether a protective order is appropriate and what degree of protection is warranted. Under Rule 26(c), the party seeking protection must show good cause, including specific prejudice or harm that would result without protection.
PRECEDENTIAL VALUE	Unknown; district court order
PARTIES	Jane Doe (T.R.S.) v. Wyndham Hotels and Resorts, Inc., Wyndham Hotel Group, LLC, Days Inn Worldwide, Inc., Marriott International, Inc., Campbell HHG Hotel Development, LP, Vitarag Hospitality, Inc.

TOPICS

discovery dispute

civil procedure

PRACTICE AREAS

civil procedure

discovery

QUESTIONS PRESENTED

1. Whether Plaintiff should be permitted to proceed under a pseudonym through pretrial proceedings.
2. Whether good cause supported entry of a protective order governing disclosure of Plaintiff's identity.
3. What restrictions should apply to nonparty fact witnesses and their counsel who receive Plaintiff's identity information.

HOLDINGS

1. Plaintiff may proceed under the pseudonym Jane Doe through pretrial proceedings; if the case proceeds to trial, the parties must raise the pseudonym issue with the court.
2. A protective order was warranted in part because Plaintiff demonstrated legitimate safety concerns and the court's modified approach properly balanced private safety interests against Defendants' ability to investigate, conduct discovery, and defend themselves.
3. Nonparty fact witnesses and their counsel must execute a separate acknowledgment and agreement that removes paragraphs 3, 5, and 6 of the proposed form and modifies paragraph 4 to prohibit use or disclosure of Plaintiff's identity in connection with or in relation to the lawsuit.

KEY QUOTATIONS

“Generally, the public can gain access to litigation documents and information produced during discovery unless the party opposing disclosure shows ‘good cause’ why a protective order is necessary.” (at 2)

“For good cause to exist, the party seeking protection bears the burden of showing specific prejudice or harm will result if no protective order is granted.” (at 2)

“The Court finds this alternative approach as outlined above properly balances the public and private interests and are consistent with other courts that have granted broader protection.” (at 4)

“I agree I will not use or disclose to anyone Plaintiff’s Identity in connection or in relation to this lawsuit.” (at 5)

FACTUAL BACKGROUND

Plaintiff alleged legitimate and genuine safety concerns arising from her status as a sex-trafficking victim and sought protection of her identity during discovery. The parties disputed only the proposed protective order's provision concerning disclosure of Plaintiff's identity. The court determined that nonparty fact witnesses should use a modified acknowledgment and agreement that prohibited disclosure of Plaintiff's identity in connection with or in relation to the lawsuit.

PROCEDURAL HISTORY

Plaintiff filed the motions under Federal Rule of Civil Procedure 26(c). The court held a hearing by Zoom on October 7, 2025. The court granted the unopposed motion to proceed under a pseudonym and granted in part and denied in part the motion for a protective order.

DISPOSITION

other

REMAND INSTRUCTIONS

The parties must meet and confer and submit a modified protective order consistent with the court's order within fourteen days.

CASES CITED

- *Seattle Times Co. v. Rhinehart*, 467 U.S. 20, 36 (1984)
- *Phillips ex rel. Estates of Byrd v. Gen. Motors Corp.*, 307 F.3d 1206, 1210-12 (9th Cir. 2002)
- *J.C. v. Choice Hotels Int'l, Inc.*, Case No. 3:20-cv-00155-WHO, ECF No. 129 (N.D. Cal. Apr. 13, 2021)
- *Doe (R.A.) v. Best W. Int'l, Inc.*, 2024 WL 4500846, at *3 (S.D. Ohio Oct. 16, 2024)