

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
CALIFORNIA

Andruhovics v. San Francisco Sheriff's Office

No. 22-cv-01178-HSG (N.D. Cal. Mar. 13, 2023) · No. 22-cv-01178-HSG · Decided March 13, 2023

SUMMARY

The United States District Court for the Northern District of California rules on several administrative motions to seal documents in *Andruhovics v. San Francisco Sheriff's Office*. The court denies the motion at Docket No. 33 because the designating party failed to establish that the material was sealable, but grants the remaining motions because they concern confidential medical records and sensitive personal information unrelated to the public's understanding of the proceedings. The court orders the parties to file public versions of documents for which sealing was denied.

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	Haywood S. Gilliam, Jr.
JURISDICTION	United States District Court for the Northern District of California
DECIDED	March 13, 2023
DOCKET	22-cv-01178-HSG
DISPOSITION	other
PROCEDURAL POSTURE	The court considered several administrative motions to file documents under seal in connection with a federal civil action, including documents related to a motion to dismiss, a motion for relief from a California government claim requirement, and a motion for leave to file an amended complaint.
STANDARD OF REVIEW	Motions to seal judicial records attached to dispositive motions are evaluated under the compelling-reasons standard, while materials attached to nondispositive motions are evaluated under the good-cause standard.
PRECEDENTIAL VALUE	unpublished
PARTIES	Maksims Andruhovics v. San Francisco Sheriff's Office, et al.

TOPICS

civil procedure

medical records privacy

health law

motions to dismiss

PRACTICE AREAS

civil procedure

health law

medical records privacy

QUESTIONS PRESENTED

1. What standard governs motions to seal documents attached to dispositive and nondispositive motions?
2. Whether the documents containing medical records and sensitive personal information qualified for sealing.
3. Whether the motion to seal at Docket Number 33 complied with Civil Local Rule 79-5(f)(3).

HOLDINGS

1. Documents attached to dispositive motions may be sealed only upon a showing of compelling reasons supported by specific factual findings that outweigh the strong presumption of public access; documents attached to nondispositive motions are subject to the lower good-cause standard.
2. Documents containing confidential medical records and interwoven sensitive personal information may be filed under seal when the information is unrelated to the public's understanding of the judicial proceedings and the sealing request satisfies the applicable compelling-reasons or good-cause standard.
3. A motion to seal another party's designated material may be denied when the designating party fails to file the required declaration and response within the time prescribed by Civil Local Rule 79-5(f)(3).

KEY QUOTATIONS

“Courts generally apply a “compelling reasons” standard when considering motions to seal documents.” (1)

“To overcome this strong presumption, the party seeking to seal a judicial record attached to a dispositive motion must “articulate compelling reasons supported by specific factual findings that outweigh the general history of access and the public policies favoring disclosure, such as the public interest in understanding the judicial process”” (1)

“Records attached to nondispositive motions must meet the lower “good cause” standard of Rule 26(c) of the Federal Rules of Civil Procedure” (2)

FACTUAL BACKGROUND

The parties sought to seal documents containing medical records, detailed descriptions of medical conditions, and other highly personal information. The court had not relied on the documents subject to the sealing motions, and the documents were therefore unrelated to the public's understanding of the proceedings. One motion sought to seal an opposing counsel's email based only on a confidentiality statement, but the designating party failed to submit the required declaration.

PROCEDURAL HISTORY

The parties filed administrative motions to seal documents. The court denied the motion at Docket Number 33 because the designating party failed to file the required declaration and response under Civil Local Rule 79-5(f) (3). The court granted the remaining motions because the documents contained sensitive medical and personal information and were not relied upon by the court; the court directed public versions of the documents covered by the denial to be filed within seven days.

DISPOSITION

other

CASES CITED

- Pintos v. Pac. Creditors Ass'n, 605 F.3d 665, 678 (9th Cir. 2010)
- Kamakana v. City & County of Honolulu, 447 F.3d 1172, 1178-80 (9th Cir. 2006)
- Nixon v. Warner Communications, Inc., 435 U.S. 589, 598 (1978)
- Phillips ex rel. Estates of Byrd v. General Motors Corp., 307 F.3d 1206, 1210-11 (9th Cir. 2002)
- Beckman Industries, Inc. v. International Insurance Co., 966 F.2d 470, 476 (9th Cir. 1992)
- In re iPhone Application Litigation, No. 11-MD-02250-LHK, 2013 WL 12335013, at *2 (N.D. Cal. Nov. 25, 2013)
- San Ramon Regional Medical Center, Inc. v. Principal Life Insurance Co., No. 10-cv-02258-SBA, 2011 WL 89931, at *1 n.1 (N.D. Cal. Jan. 10, 2011)
- Economus v. City & County of San Francisco, No. 18-CV-01071-HSG, 2019 WL 1483804, at *9 (N.D. Cal. Apr. 3, 2019)
- Doe v. City of San Diego, No. 12-CV-689-MMA-DHB, 2014 WL 1921742, at *4 (S.D. Cal. May 14, 2014)