

**CAUSE NO. DC-24-19378**

IN RE: THE 1975 RICHARD ROGERS  
TRUST

RYAN ROGERS and TOLLESON  
PRIVATE BANK,

Petitioners,

v.

RICHARD ROGERS, ET AL.

Respondents.

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RICHARD R. ROGERS, individually  
and as primary beneficiary of the Mary  
Kay-Richard R. Rogers 1975 Trust,

Petitioner,

v.

RYAN T, ROGERS, individually and as  
Personal trustee of the Mary Kay-  
Richard R. Rogers 1975 Trust, and  
TOLLESON PRIVATE BANK,  
Individually and as corporate trustee of  
The Mary Kay-Richard R. Rogers 1975  
Trust,

Respondents.

IN THE 160<sup>th</sup> DISTRICT COURT

FOR

DALLAS COUNTY TEXAS

**RICHARD R. ROGERS'S OPPOSITION TO  
PETITIONERS' MOTIONS TO SEAL COURT RECORDS**

TO THE HONORABLE JUDGE OF THIS COURT:

Respondent Richard R. Rogers ("*Richard*"), by and through his undersigned attorneys, respectfully submits this opposition to Petitioners Ryan T. Rogers ("*Ryan*") and Tolleson Private Bank's ("*Tolleson*") (collectively, "*Petitioners*") Motions to Seal Court Records ("*Motions*").

## **I. PRELIMINARY STATEMENT**

Petitioners' extraordinary request to seal the record falls far short of meeting either—let alone both—of the requirements to obtain that disfavored relief. Petitioners' stated justification for sealing the entire record is to protect the sensitive and confidential personal financial information of the Trusts' beneficiaries, including personally identifiable information regarding minors. This is not the required "specific, serious and substantial interests" that justifies such a broad seal. Nor do Petitioners even attempt to establish that "no less restrictive means" will adequately protect any such interests. Indeed, Richard has no objection to the redaction of personally identifiable information and information specifically identifying minors, thereby protecting the privacy interests Petitioners assert with appropriately tailored relief. Petitioners did not note this fact in their Motions, however, because Petitioners failed to confer with Richard (or presumably with any other party to this case as evidenced by the lack of a certificate of conference) on any of their Motions, as required by Dallas County Local Rule 2.07. Petitioners' motion should be denied because their stated justification does not "clearly outweigh[]" the presumption of openness, and because less restrictive means can adequately protect the interests asserted in their stated justification.

As no other beneficiary has joined in the requests to seal the records, Petitioners true motives are clear: rather than protect the beneficiaries' confidential information, the real reason Petitioners seek to seal the record is to conceal their misdeeds from public scrutiny. As Richard's filings explain, Petitioners have breached their fiduciary duties as trustees of the Mary Kay Ash - Richard R. Rogers 1975 Trust (the "*Trust*").

## II. BACKGROUND

On November 1, 2024, while the Parties were attempting to negotiate a resolution, the Petitioners filed their Original Petition for Declaratory Judgment (the “*Petition*”) without prior notice to any of the Parties. On August 14, 2025, the Petitioners filed an Amended Petition for Declaratory Judgment (the “*Amended Petition*”). The Amended Petition seeks declarations that the Petitioners have “appropriately discharged their fiduciary duties” with respect to their unlawful self-dealing scheme. *See* Amended Pet. ¶ 11(d)-(e). The Amended Petition also improperly asks this Court to “determine whether Richard’s . . . positions over the past several years are of his own volition” and seeks to block Richard from exercising his unilaterally-held contractual rights “during the pendency of this action”—claims which are entirely meritless, exceed this Court’s jurisdiction, and are outside the ambit of the declaratory judgments act. *See id.* ¶¶ 12, 62; *see also* Respondent’s Plea to the Jurisdiction (filed on November 15, 2024).

On November 6, 2024, Richard filed an Answer and Counterclaims (“*Counterclaims*”) to the Petition, including allegations that the Petitioners engaged in a self-dealing scheme to misappropriate the Mary Kay family wealth for their personal use and enrichment. On that same date, Richard filed a Motion for the Appointment of a Receiver (“*Receiver Motion*”) to protect the Trust’s assets and put a stop to further misconduct by the Petitioners. The Petitioners filed a Motion to Seal the Petition (“*First Motion to Seal*”), a Motion to Seal Richard’s Counterclaims and Receiver Motion (“*Second Motion to Seal*”), and a Motion to Seal the Petitioners’ Request for Citations (“*Third Motion to Seal*”),<sup>1</sup> including all attached exhibits, on a permanent and blanket basis.

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<sup>1</sup> The Third Motion to Seal seeks to seal the Petitioners’ Request for Citations because it attaches the Petition and accompanying exhibits.

On August 8, 2025, Richard filed Amended Counterclaims and Answer to Petition for Declaratory Judgment (“*Amended Counterclaims*”), propounding the allegations in the Counterclaims and requesting Ryan’s removal, and confirmation of Tolleson’s prior removal, as Trustees of the Richard R. Rogers Trust. Richard also filed an Amended Motion for Appointment of Receiver (“*Amended Receiver Motion*”), seeking to stop the continuing breaches of fiduciary duty by Petitioners. The Petitioners filed a Fourth Motion to Seal Court Records (“*Fourth Motion to Seal*”), requesting permanent sealing of the Amended Counterclaims and the Amended Receiver Motion, as well as accompanying exhibits, following notice to the public and a hearing. After filing the Amended Petition, in which Petitioners seek the same relief they had sought in the Petition, as well as a declaratory judgment that the attempted removal of Tolleson was ineffective and void, and a declaratory judgment that the adoption of Olivia Abbott was void, Petitioners filed a Fifth Motion to Seal Court Records (“*Fifth Motion to Seal*”) seeking to seal the Petitioners’ First Amended Petition and the accompanying exhibits. Despite the clear requirement under Local Rule 2.07, Petitioners failed to confer with opposing counsel prior to filing any of these Motions, and each filing lacks the required certificate of conference.

As of this filing, no other Parties have joined in these overbroad requests to seal the records, including the beneficiaries Petitioners are allegedly seeking to protect.

### **III. LEGAL STANDARD**

Rule 76a of the Texas Rules of Civil Procedure provides that court records:

are presumed to be open to the general public and may be sealed only upon a showing of all of the following:

- (a) a specific, serious and substantial interest which clearly outweighs:
  - (1) this presumption of openness;
  - (2) any probable adverse effect that sealing will have upon the general public health or safety;



(b) no less restrictive means than sealing records will adequately and effectively protect the specific interest asserted.

Tex. R. Civ. P. 76a(1); *see also Wood v. James R. Moriarty, P.C.*, 940 S.W.2d 359, 361 (Tex. App. 1997) (providing that the movant “must prove the elements of rule 76a(1) by a preponderance of the evidence”); *Boardman v. Elm Block Dev. Ltd. P’ship*, 872 S.W.2d 297, 299 (Tex. App. 1994) (noting that Rule 76a imposes “heavy burdens which a movant must satisfy in order to secure an order sealing court records”). If the movant fails to meet either element of Rule 76a, the request to seal must be denied. *See Compaq Computer Corp. v. Lapray*, 75 S.W.3d 669, 674-75 (Tex. App. 2002) (providing that the “the party seeking to seal records [has] the burden to show **both**” elements of Rule 76a(1), and upholding denial of seal where the movant “failed to carry its burden to show the ‘no less restrictive means’ or second prong of subsection (1)”) (emphasis in original); *see also Tex. R. Civ. P. 76a(1)* (providing that records “may be sealed only upon a showing of **all** of the following”) (emphasis added).

#### IV. ARGUMENT

The Petitioners fall far short of meeting their “heavy burden[.]” for sealing. *Boardman*, 872 S.W.2d at 299. They seek to permanently seal their Petition and their Amended Petition, as well as Richard’s Amended Counterclaims and Amended Receiver Motion, only on generalized allegations of “sensitive information” or “safety concerns,” without any specific allegations or evidence. Such conclusory assertions of confidentiality or sensitivity do not suffice. *See McAfee, Inc. v. Weiss*, 336 S.W.3d 840, 845 (Tex. App. 2011) (upholding denial of seal “given the generality of [the movant’s] asserted interest in confidentiality”). And the Petitioners have not even attempted to demonstrate that there are no less restrictive means. In reality, the Petitioners’ effort to seal this record is just an attempt to hide their misconduct, which is not a sufficient—or proper—justification to seal this matter.

**A. Petitioners Fail to Identify Any “Specific, Serious, and Substantial” Interest that Outweighs the Presumption of Openness**

As an initial matter, Petitioners’ argument—that a seal is needed to protect purportedly “sensitive, nonpublic information regarding the Trust”—fails because the records Petitioners seek to seal do not disclose such information. *See* First Mot. Seal at 2; Second Mot. Seal at 2; Third Mot. Seal at 2; Fourth Mot. Seal at 3; Fifth Mot. Seal at 2. The Petition includes only vague, outdated and general discussions of distribution requests. *E.g.*, Amended Pet. ¶ 7 (“substantial monthly distribution”); *id.* ¶ 9 (“lump sum ‘catch-up’ payment”); *id.* Ex. B (describing specific monthly distributions to three of the fourteen beneficiaries—all adults—more than 15 years ago). Nor do any of the parties’ papers include any specific references to the Trust’s total value. Richard’s Amended Counterclaims mention *once* the “significant value” of the Trust, Amended Counterclaims ¶ 64, and the Petition makes no mention of the Trust’s value at all. Neither filing includes any specific details about investments, account statements, or other detailed financial information. In sum, the records Petitioners seek to seal do not disclose any “sensitive” information regarding the Trust, and as such, public access to the records in this case in no way threatens the purported privacy interests Petitioners assert. *See Wood*, 940 S.W.2d at 364 (upholding denial of seal even where records contained “records of compensation,” “stock options,” “billing records,” “tax returns,” and “financial statements” because movant failed to demonstrate “a specific, serious, and substantial interest which clearly outweighs the presumption of openness”).

Nor is the fact that the records contain purportedly confidential information sufficient to justify sealing. *See* First Mot. Seal at 3 (“The Petition and accompanying exhibits filed in this case contain sensitive and confidential financial information concerning the Trust . . . [and Petitioners] have strictly maintained the confidentiality of this information.”); Second Mot. Seal at 4 (same);

Third Mot. Seal at 4 (same); Fourth Mot. Seal at 4 (same); Fifth Mot. Seal at 4 (same). Indeed, private information regarding a trust is paramount in every trust dispute, and the Petitioners have identified no trust-litigation exception to the rule that filings are presumptively open to the public. *See McAfee*, 336 S.W.3d at 845 (“We have found no cases recognizing a party’s general interest in a confidentiality agreement . . . as a specific, serious, and substantial interest within the meaning of Rule 76a(1). The relevant case law indicates that the interest relied on must be more specific than that.”). Such generalized allegations of confidentiality, without more, do not establish the “specific, serious and substantial interest” needed to overcome the presumption of openness, a showing Petitioners entirely fail to make. *See Wood*, 940 S.W.2d at 364 (upholding denial of motion to seal in part because “appellants proved that the records were private, but they presented no evidence showing that the lack of restrictions on access to the financial information would cause them irreparable harm.”).

Moreover, much of the record the Petitioners seek to seal is wholly unrelated to the interests they purport to protect. For example, Richard’s Amended Counterclaims allege that the Petitioners have engaged in a self-dealing scheme designed to siphon Trust profits to the Petitioners’ exclusive control, Amended Counterclaims ¶ 16, improperly favored other beneficiaries at Richard’s expense, *id.* ¶¶ 61–62, and wrongfully withheld information to which Richard and the other trust beneficiaries are entitled under the plain terms of the Trust Instrument, *id.* ¶¶ 86–90. Absent “a specific, serious, and substantial interest,” such information is presumed to be open to the public. *See HouseCanary, Inc. v. Title Source, Inc.*, 622 S.W.3d 254, 263–64 (Tex. 2021) (“The public’s right of access to judicial proceedings ‘is a fundamental element of the rule of law’ because ‘monitoring the exercise of judicial authority’ helps ‘maintain the integrity and legitimacy of an independent Judicial Branch.’”) (quoting *Le v. Exeter Fin. Corp.*, 990 F.3d 410, 417 (5th Cir.

2021)) (brackets omitted). The Petitioners have not identified any interest connected with these allegations. Instead, in keeping with their history of obfuscation and failure to disclose, the Petitioners only seek to seal these records so that their misconduct is not subject to public scrutiny; this is not enough of an interest to seal the records.

As Petitioners have failed to establish a “specific, serious and substantial interest” which “clearly outweighs” the “presumption of openness,” the Court may—and respectfully should—end its inquiry here and deny Petitioners’ Motions.

**B. The Petitioners Fail to Demonstrate that There Are “No Less Restrictive Means Than Sealing”**

Regardless, the Petitioners have also failed to demonstrate that there are “no less restrictive means” which will adequately “protect the specific interest asserted.” Tex. R. Civ. P. 76a(1)(b). To meet their “heavy burden,” the Petitioners must articulate specific reasons demonstrating the inadequacy of potential “less restrictive means.” *See, e.g., Compaq*, 75 S.W.3d at 675 (“[T]he issue is not whether *there was* a ‘less restrictive’ means available other than sealing to protect [the movant’s] interests, but whether [the movant] showed *there was no* ‘less restrictive’ means available.”). The Petitioners have not done so.

Here, the Petitioners have made *no* effort to show the inadequacy of less restrictive means (redactions of personally identifiable information and information specifically identifying minors). Indeed, the Petitioners devote only one sentence on this point, simply pronouncing that “no less restrictive means exist to protect the confidential nature of this information.” *See* First Mot. Seal at 4; Second Mot. Seal at 5; Third Mot. Seal at 5; Fourth Mot. Seal at 5; Fifth Mot. Seal at 5. Such a conclusory assertion fails to meet their “heavy burden.” The Motions may be denied on that basis alone. *Volvo Car Corp. v. Marroquin*, No. 13-06-00070-CV, 2009 WL 3647348, at \*5 (Tex. App. Nov. 5, 2009) (upholding denial of seal where movant “failed to carry its burden to

demonstrate that no less restrictive means than completely sealing the [movant's] documents would adequately and effectively protect its interest"); *Compaq*, 75 S.W.3d at 674 (upholding denial of seal because movant "failed to carry its burden to show the 'no less restrictive means' or second prong of subsection (1)").

The purported "safety concerns" Petitioners raise for Richard's minor grandchildren may be adequately protected through the less restrictive means of redaction of personally identifiable information and information specifically identifying minors. *See* Second Mot. Seal at 2-3 (alleging that "there are also safety concerns, because the documents expose that these beneficiaries, including minors, have access to enormous distributions and identify the addresses at which they may be found, should anyone attempt to physically harm, and/or target these beneficiaries for ransom"); Third Mot. Seal at 2-3 (same); Fourth Mot. Seal at 3 (same); Fifth Mot. Seal at 3 (same).<sup>2</sup> Indeed, the Petitioners have *already redacted* the personal information of the only two minor beneficiaries, Amended Pet. ¶ 14(m)-(n), "effectively conced[ing]" the availability of such a less restrictive alternative. *See BP Prod. N. Am., Inc. v. Houston Chron. Pub. Co.*, 263 S.W.3d 31, 35 (Tex. App. 2006) ("By tendering the 15 redacted witness statements, [the movant] effectively conceded that a less restrictive alternative—redaction—was available to the broad sealing order it requested. [The movant] therefore failed to meet its burden under Rule 76a.").

To that end, Richard agrees that personally identifying information and information about minors, including their names and addresses, should be sealed to protect their privacy and safety. As such redactions effectively address the safety and privacy interest Petitioners assert, their

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<sup>2</sup> Petitioners vastly overstate these purported "safety concerns." They have failed to offer evidence of any threat of "physical harm" or "ransom," and in the months that these documents were publicly available, Richard is not aware of any threats that have been received or made against any beneficiary, adult or minor.

request to permanently seal the record in this case should be denied. *See McAfee*, 336 S.W.3d at 845 (“We discount the need to keep the award confidential . . . because the trial court has redacted [names] from the award and [movant] has not argued that the redaction is insufficient to protect those witnesses’ identities and their interest in privacy.”); *Volvo*, 2009 WL 3647348, at \*5 (upholding denial of seal where “[Movant] did not specifically indicate whether redacting the information . . . would still protect its interests”). Had Petitioners simply followed the Local Rules and conferred with counsel before filing, this entire dispute could have been avoided, as Richard’s position on redacting personally identifying information and information about minors is exactly the less restrictive means that obviate the need for a blanket seal.

## V. PRAYER

For these reasons—except as necessary to conceal personally identifying information and information about minors—Richard respectfully asks the Court deny the Petitioners’ Motions to Seal Court Records.

Dated: August 15, 2025

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of this document has been served on all counsel of record, via e-service, on August 15, 2025.

/s/ Chad T. McLain  
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