

# **Bond Case Briefs**

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## **OPEN MEETINGS - NORTH DAKOTA**

### **Haskell v. Grand Forks Public School District**

**Supreme Court of North Dakota - February 12, 2026 - N.W.3d - 2026 WL 392314 - 2026 ND 40**

Field consultant for public teachers' union brought action against school district, contending that school board violated open meetings statute and due process by entering executive session to discuss matter relating to teacher's grievance, and seeking order requiring board to disclose recording of such session.

Parties cross-moved for summary judgment. The District Court, Grand Forks County, Northeast Central Judicial District, granted district's motion. Consultant appealed.

The Supreme Court held that:

- District's attorney did not waive attorney-consultation exemption by making public statements;
- Board followed proper process for entering executive session;
- Public disclosure of amount of money teacher sought via grievance did not preclude board's invocation of attorney-consultation exemption; and
- District court did not violate procedural due process by denying consultant opportunity to review transcript of executive session; but
- District court was required to conduct in camera review of executive session recording, rather than accepting district's word that all matters discussed were exempt.