

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
NEW YORK

Suzanne Lucas v. Hartford Life and Accident Insurance Company

Lucas v. Hartford · No. 1:24-cv-7561 (VEC) · Decided November 24, 2025

SUMMARY

This document is a joint letter-motion by the parties in Suzanne Lucas v. Hartford Life and Accident Insurance Company requesting permission to file an administrative record, appeal materials, and surveillance video under seal. The parties cited medical, personally identifying, and other sensitive information as grounds for sealing. On November 24, 2025, Judge Valerie Caproni granted the application in part, allowing Exhibits A, B, C, and E to be filed under seal while directing the defendant to file Exhibit D publicly or provide further justification for sealing it.

CASE DETAILS

COURT	United States District Court for the Southern District of New York
WRITING FOR THE COURT	Valerie E. Caproni
DECIDED	November 24, 2025
DOCKET	1:24-cv-7561 (VEC)
DISPOSITION	other
PROCEDURAL POSTURE	The parties jointly moved under Federal Rule of Civil Procedure 5.2(d) for permission to file under seal a non-redacted administrative record, surveillance video footage, and appeal-related documents submitted in support of Defendant's motion for summary judgment.
STANDARD OF REVIEW	Whether good cause exists to overcome the presumption of public access to judicial documents, and whether sealing is narrowly tailored to protect legitimate privacy interests.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Suzanne Lucas v. Hartford Life and Accident Insurance Company

TOPICS

- civil procedure
- insurance
- medical records privacy
- hipaa
- health law

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether good cause supported sealing the administrative record, surveillance footage, and related appeal documents because they contained medical and personally identifiable information.
2. Whether Exhibit D of the Lunemann Declaration should also be filed under seal.

HOLDINGS

1. Good cause supported sealing Exhibits A, B, C, and E of the Lunemann Declaration because the materials were voluminous and permeated with confidential medical, personally identifiable, and other sensitive information, and sealing was the most narrowly tailored practical means of protecting that information.
2. Exhibit D could not be sealed on the showing made because it did not appear to contain sensitive information; Defendant was required either to file it publicly or explain in greater detail why sealing was warranted.

KEY QUOTATIONS

“Application GRANTED IN PART. Exhibits A, B, C, and E of the Lunemann Declaration, Dkt. 71, may be filed under seal. Exhibit D (HARTFORD 001028), however, does not appear to contain any sensitive information; accordingly, Defendant must file that Exhibit publicly or explain in greater detail why it should be filed under seal.” (Page 3)

“Courts in this Circuit have repeatedly held that information protected by HIPAA is not subject to a First Amendment or common-law right of access and thus have sealed docket entries and redacted documents that contain such information.” (Page 2)

FACTUAL BACKGROUND

The administrative record consists of approximately 1,027 pages and surveillance video footage. The parties represented that the record and related appeal documents contain medical conditions, diagnoses, treatment information, possible protected health information, Social Security numbers, dates of birth, home addresses, and other personally identifiable information, as well as images of persons other than Plaintiff. Defendant sought to file the materials under seal for judicial review, while the court determined that Exhibit D did not appear to contain sensitive information.

PROCEDURAL HISTORY

The sealing application was presented to the Southern District of New York in the pending ERISA action. The court granted the application in part, permitting Exhibits A, B, C, and E of the Lunemann Declaration to be filed under seal, but requiring Defendant either to file Exhibit D publicly or provide a more detailed justification for sealing it.

DISPOSITION

other

CASES CITED

- Grayson v. Gen. Elec. Co., 2015 WL 1867736, at *1 (D. Conn. Apr. 23, 2015)
- Geller v. Branic Int'l Realty Corp., 212 F.3d 734, 738 (2d Cir. 2000)
- S.W. on behalf of A.W. v. New York City Dep't of Educ., No. 22 CIV. 3592 (LGS), 2023 WL 5803415, at *10 (S.D.N.Y. Sept. 7, 2023)
- J.M. v. United Healthcare Ins., No. 21 CIV. 6958 (LGS), 2023 WL 6542179, at *2 (S.D.N.Y. Sept. 29, 2023)
- Valentini v. Grp. Health Inc., No. 20CV09526 (PC), 2020 WL 7646892, at *2 (S.D.N.Y. Dec. 23, 2020)
- Tydl v. Stanley Black & Decker Life Ins. Prog., No. 3:17-CV-1591 (VAB), 2020 WL 13149812, at *1 (D. Conn. Feb. 21, 2020)
- Offor v. Mercy Med. Ctr., 167 F. Supp. 3d 414, 445 (E.D.N.Y. 2016), vacated in part on other grounds, 676 F. App'x 51 (2d Cir. 2017)

OPINION

e@ Robinson+Cole MATTHEW P. MAZZOLA 666 Third Avenue, 20" floor New York, NY 10017 Main (212) 451-2900 Fax (212) 451-2999 mmazzola@rc.com Direct (212) 451-2913 Also admitted in Florida and New Jersey November 21, 2025.. USDC SDNY Lae 8 ELECTRONICALLY FILED United States District Court for the Southern District of New York DOC #:__ S DATE FILED: 11/24/2025 40 Foley Square ——— New York, NY 10007 Re: = Suzanne Lucas v. Hartford Life and Accident Insurance Company Case No.: 1:24-cv-7561 (VEC) Dear Judge Caproni: The Law Office of Jeffrey Delott represents Plaintiff Suzanne Lucas, and Robinson & Cole LLP represents Defendant Hartford Life and Accident Insurance Company ("Hartford") in the above-referenced action.

We write jointly, pursuant to Fed. R. Civ. P. 5.2(d), Sections 6 and 21 of the S.D.N.Y. Electronic Case Filing Rules & Instructions, and Sections 1.A and 4.A of Your Honor's Individual Rules of Practice in Civil Cases, to request entry of an order permitting Defendant to file a non-redacted version of the exhibits to the Declaration of Jamie Lunemann submitted in support of its Motion for Summary Judgment under seal for judicial review with the Clerk of the Court.

Specifically, Defendant seeks to file the following documents under seal: e The Administrative Record' in this matter, which includes 1027 pages and surveillance video footage; and e The email from Jeffrey Delott dated August 20, 2024 containing a link to Lucas' appeal and the appeal documents themselves, which include 221 pages. District courts within the Second Circuit "enjoy considerable discretion in determining whether good cause exists to overcome the presumption of open access to documents filed in federal courts." Grayson v. Gen.

Elec. Co., 2015 WL 1867736, at *1 (D. Conn. Apr. 23, 2015) (citing *Geller v. Branich Int'l Realty Corp.*, 212 F.3d 734, 738 (2d Cir. 2000)). ' The parties dispute whether the Plaintiffs email containing a link to her appeal submission, and the documentation in the link itself, should be included as part of the Administrative Record and thus, those documents are discussed separately.

Boston | Hartford | New York | Washington, DC | Providence | Miami | Austin | Stamford | Wilmington | Philadelphia | Los Angeles | Albany rc.com | Robinson & Cole LLP Robinson+Cole Hon. Valerie Caproni November 21, 2025 Page 2 Good cause exists to seal the documents referenced above, which spans nearly 1228 pages and contains video footage of the Plaintiff The documents are replete with information regarding Plaintiff's medical conditions, diagnosis and treatment that may be protected health information ("PHI") under the Health Insurance Portability and Accountability Act ("HIPAA") and the surveillance video captures images of people other than the Plaintiff.

See, e.g., *S.W. on behalf of A.W. v. New York City Dep't of Educ.*, No. 22 CIV. 3592 (LGS), 2023 WL 5803415, at *10 (S.D.N.Y. Sept. 7, 2023) (granting motion to seal administrative record because "the Record is voluminous and permeated with confidential information" and "[r]edacting the Record would be unduly burdensome"); *M. v. United Healthcare Ins.*, No. 21 CIV.

6958 (LGS), 2023 WL 6542179, at *2 (S.D.N.Y. Sept. 29, 2023) (granting motion to "seal the entire Administrative Record, which contains highly sensitive personal and medical information of Plaintiff M.M."); *Valentini v. Grp. Health Inc.*, No. 20CV09526 (PC), 2020 WL 7646892, at *2 (S.D.N.Y. Dec. 23, 2020) ("[B]ecause a plaintiff maintains significant privacy rights to her medical information, courts regularly seal records protected from disclosure by HIPAA."); *Tydv.*

Stanley Black & Decker Life Ins. Prog., No. 3:17-CV-1591 (VAB), 2020 WL 13149812, at *1 (D. Conn. Feb. 21, 2020) ("The Court granted the parties' joint motion to submit the [over 1200 page] Administrative Record for Judicial Review ('Administrative Record') under seal in order to protect the Plaintiff's and her husband's personal identifiers, medical records, and financial record."); *Offor v. Mercy Med.*

Cir., 167 F. Supp.3d 414, 445 (E.D.N.Y. 2016) (collecting cases), vacated in part on other grounds, 676 Fed. Appx. 51 (2d Cir. 2017) ("Courts in this Circuit have repeatedly held that information protected by HIPAA is not subject to a First Amendment or common-law right of access and thus have sealed docket entries and redacted documents that contain such information.").

Accordingly, sealing the entire record is the most narrowly-tailored means available for protecting Plaintiffs PHI and the identity/images of other people in the surveillance videos. In addition, the documents comprising the record are laced with references to Plaintiffs social security number, date of birth, home address and other sensitive and personally identifiable information (PID).

In light of the sheer volume of PHI and PII spanning the Administrative Record, virtually all of the documents submitted for judicial review would need to be redacted. This would be an extremely burdensome task. Making the Administrative Record available for public inspection would serve very little, if any, public purpose and would risk significant intrusion on Plaintiffs privacy (as well as those people whose images are captured in the surveillance footage).

As a practical matter, there is no less restrictive alternative available than submitting a non-redacted copy of the above-referenced documents and surveillance video footage directly to the Clerk of the Court under seal. Robinson+Cole Hon. Valerie Caproni November 21, 2025 Page 3 In light of all of the foregoing, the parties respectfully request that the Court enter an order permitting Defendant to file a non-redacted Administrative Record under seal for judicial review with the Clerk of the Court.

Respectfully submitted, Respectfully submitted, /s/ Jeffrey Delott /s/ Matthew P. Mazzola Jeffrey Delott Matthew P. Mazzola Law Office of Jeffrey Delott Michael H. Bernstein Robinson & Cole LLP Counsel for Plaintiff Counsel for Defendant Application GRANTED IN PART. Exhibits A, B, C, and E of the Lunemann Declaration, Dkt. 71, may be filed under seal. Exhibit D (HARTFORD 001028), however, does not appear to contain any sensitive information; accordingly, Defendant must file that Exhibit publicly or explain in greater detail why it should be filed under seal.

SO ORDERED. (¢ Velen 11/24/2025 HON. VALERIE CAPRONI UNITED STATES DISTRICT JUDGE