

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
NEW YORK

Goolden v. Wardak

No. 1:19-cv-06257 (S.D.N.Y. Dec. 2, 2025) · No. 1:19 Civ. 06257 (ALC) (VF) · Decided December 2, 2025

SUMMARY

This document is a defendant’s letter motion in Sarah Goolden v. Hamed Wardak requesting that unredacted attorney invoices be filed and maintained under seal. The motion argues that the invoices contain confidential business information, attorney work product, and privileged communications. The court directed the defendant to file the documents with redactions to privileged information at the selected-parties viewing level so they could be accessed by the plaintiff.

CASE DETAILS

COURT	United States District Court for the Southern District of New York
WRITING FOR THE COURT	Valerie Figueredo
DECIDED	December 2, 2025
DOCKET	1:19 Civ. 06257 (ALC) (VF)
DISPOSITION	other
PROCEDURAL POSTURE	Defendant submitted a letter motion seeking to maintain unredacted attorney invoices under seal in connection with a reply memorandum supporting a motion for attorneys’ fees.
PRECEDENTIAL VALUE	Unknown

TOPICS

attorney fees civil procedure commercial litigation

PRACTICE AREAS

civil procedure commercial litigation attorney fees

QUESTIONS PRESENTED

- Whether Defendant could file unredacted attorney invoices under seal in connection with its motion for attorneys’ fees.
- What access and redaction restrictions should apply to the invoices and related exhibit.

HOLDINGS

1. The court did not permit the unredacted filing to remain inaccessible to Plaintiff; instead, Defendant was directed to file the submission and exhibit with redactions of privileged information at the selected-parties viewing level so Plaintiff could access them.

KEY QUOTATIONS

“Defendant is directed to file ECF No. 276 and the exhibit with redactions to any privileged information at the "selected parties" viewing level so it may be accessed by Plaintiff.” (at 1)

FACTUAL BACKGROUND

Defendant sought to submit unredacted attorney invoices in connection with a reply memorandum supporting a motion for attorneys’ fees. The invoices contained confidential information concerning counsel’s work, including counsel’s choices and priorities, as well as privileged information. The court directed that privileged information be redacted before the filing and exhibit were made accessible to Plaintiff.

PROCEDURAL HISTORY

In the underlying action, Defendant Hamed Wardak filed a letter motion and an exhibit ex parte concerning unredacted legal invoices. The court directed Defendant to file the submission and exhibit with redactions of privileged information at the selected-parties viewing level so that Plaintiff could access them.

DISPOSITION

other

CASES CITED

- Richards v. Kallish, No. 22 Civ. 9095, 2023 WL 7126311 (S.D.N.Y. Oct. 30, 2023)
- Brown v. Maxwell, 929 F.3d 41 (2d Cir. 2019)
- Weiss v. Yotta Technologies, Inc., No. 22 Civ. 8569, 2025 WL 1190807 (S.D.N.Y. Apr. 22, 2025)

OPINION

Goolden
PER CURIAM.

November 26, 2025 By ECF Honorable Valerie Figueredo MEMO ENDORSED United States Magistrate Judge oy . | United States District Court \} N \ ML Xx Southern District of New York VALERIE FIGUEREDO 7-7” Thurgood Marshall United States Courthouse UNITED STATES MAGISTRATE JUDGE 40 Foley Square Dated: December 2, 2025 New York, NY 10007 Defendant filed ECF No. 276 and the exhibit ex Re: Sarah Goolden v. Hamed Wardak | parte. Defendant is directed to file ECF No. 276 1:19 Civ. 06257 (ALC) (VF) and the exhibit with redactions to any privileged information at the "selected parties" Dear Judge Figueredo: viewing level so it may be accessed by Plaintiff. We represent the defendant, Hamed Wardak (“Defendant”)

in the above-referenced matter. Defendant respectfully submits this letter motion in accordance with this Court's Individual Practice Rule I.G and Local ECF Rules and Instructions, Section 6. Defendant respectfully requests that the Court seal the unredacted copies of Defendant's legal invoices (the "Invoices") in connection with his Reply Memorandum of Law in Further Support of Motion for Attorneys' Fees, which Defendant will file contemporaneously with this Letter Motion. "Although the presumption of public access attaches to all judicial documents, 'the presumption of public access in filings submitted in connection with discovery disputes ... is generally somewhat lower than the presumption applied to material introduced at trial, or in connection with dispositive motions.'" *Richards v. Kallish*, No. 22 Civ. 9095, 2023 WL 7126311, at *1 (S.D.N.Y. Oct. 30, 2023) (quoting *Brown v. Maxwell*, 929 F. 3d 41, 47-48 (2d Cir. 2019)). Courts in this District routinely seal documents to prevent the disclosure of a party's confidential business information, as well as attorney-client privileged information. See, e.g., *Weiss v. Yotta Technologies, Inc.*, No. 22 Civ. 8569, 2025 WL 1190807, at *6 n.4 (S.D.N.Y. Apr. 22, 2025) (granting letter motion to seal unredacted copies of attorney invoices that "contain[ed] attorney work product and privileged communications"); *Richards*, 2023 WL 7126311, at *2 ("[C]ourts often choose to review invoices and billing records in camera when calculating awards of attorneys fees and costs.") (collecting cases). Here, the documents for which sealing is requested are unredacted attorney invoices. They contain confidential information regarding work done by counsel and choices and priorities given to work by counsel, among other things. Accordingly, Defendant respectfully requests that the Court enter an order directing that Defendant's Invoices may remain under seal. Hon. Valerie Figueredo □ □ November 26, 2025 Page 2 of 2 We thank the Court for its consideration. Respectfully submitted,

YANKWITT LLP

IO Benjamin Allee Ce: All parties (by ECF)