

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)