

SUPREME COURT OF THE STATE OF NEW YORK, APPELLATE DIVISION,
FIRST DEPARTMENT

Sinckler v. Mohammed

2026 NY Slip Op 00998 · No. Index Nos. 800274/24, 800555/24; Appeal Nos. 5871-5872; Case Nos. 2025-04758, 2025-05029 · Decided February 19, 2026

SUMMARY

The Appellate Division, First Department affirmed orders disqualifying plaintiff's attorney and law firm from representing Geoffrey Sinckler in two property-related actions against Ibrahim Mohammed. The court held that Mohammed established a prior attorney-client relationship with the attorney, substantial relatedness between the representations, and materially adverse interests warranting disqualification.

CASE DETAILS

COURT	Supreme Court of the State of New York, Appellate Division, First Department
WRITING FOR THE COURT	Webber, J.P.; Kapnick, J.; Gesmer, J.; Shulman, J.; Michael, J.
JURISDICTION	New York Supreme Court, Appellate Division, First Department
DECIDED	February 19, 2026
DOCKET	Index Nos. 800274/24, 800555/24; Appeal Nos. 5871-5872; Case Nos. 2025-04758, 2025-05029
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff appealed from two orders of Supreme Court, Bronx County, granting defendant Ibrahim Mohammed's motions to disqualify plaintiff's attorney and law firm. The Appellate Division unanimously affirmed both orders with costs.
STANDARD OF REVIEW	Abuse of discretion; whether Supreme Court providently exercised its discretion in disqualifying counsel.
PRECEDENTIAL VALUE	Published New York Appellate Division opinion
PARTIES	Geoffrey Sinckler v. Ibrahim Mohammed

TOPICS

- civil procedure
- appellate procedure
- real estate
- commercial litigation
- standard of review

PRACTICE AREAS

Legal ethics and professional responsibility

Civil procedure

Real estate litigation

Commercial litigation

Appellate procedure

QUESTIONS PRESENTED

1. Whether Supreme Court properly disqualified Steve Okenwa and the Okenwa Law Firm from representing Sinckler where Okenwa previously represented Mohammed, the matters were substantially related, and the parties' interests were materially adverse.

HOLDINGS

1. The court properly exercised its discretion in disqualifying Steve Okenwa and the Okenwa Law Firm because Mohammed established a prior attorney-client relationship with Okenwa, substantial relatedness between the prior and current representations, and material adversity between Mohammed's and Sinckler's interests.

KEY QUOTATIONS

“Both actions involve defendant's alleged scheme to use his business relationship with plaintiff to defraud plaintiff into transferring his properties to defendant's corporate entities.” ([*1])

“Accordingly, there is a substantial risk that Okenwa may have obtained information about the nature of the parties' business relationship when he represented defendant in connection with the 239 property which could be used against Mohammed in the Fenton Avenue action.” ([*1])

FACTUAL BACKGROUND

Sinckler brought two actions alleging that Mohammed abused their business relationship to induce the transfer of Sinckler's properties to Mohammed's corporate entities. Okenwa had previously represented Mohammed in connection with a Bronx property and had also represented both parties' interests in an earlier action concerning ownership of that same property. The second action concerned an allegedly fraudulently induced transfer of property on Fenton Avenue, which the court found substantially related to Okenwa's prior representation of Mohammed.

PROCEDURAL HISTORY

Geoffrey Sinckler commenced two actions against Ibrahim Mohammed concerning alleged fraudulent conduct involving Sinckler's properties. Supreme Court, Bronx County, entered orders on July 1 and July 9, 2025, disqualifying Steve C. Okenwa and the Okenwa Law Firm from representing Sinckler. Sinckler appealed, and the Appellate Division affirmed both orders.

DISPOSITION

affirmed

CASES CITED

- Tekni-Plex, Inc. v. Meyner & Landis, 89 N.Y.2d 123, 131 (1996)

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