



Generative AI Hallucinations in U.S. Court Filings: Sanctions, Trends, and COUNSEL Governance Mapping

Executive summary

U.S. courts have moved from cautionary language about generative AI to **actual monetary sanctions, attorney disqualification, pro hac vice revocations, and referrals to disciplinary authorities** when lawyers file briefs containing **hallucinated or fabricated citations/quotations** that were not independently verified. Early federal sanctions in **U.S. District Court for the Southern District of New York** ¹ (U.S. District Court for the Eastern District of California ²), **and later escalation in** U.S. District Court for the District of Wyoming ³ **and** U.S. District Court for the Northern District of Alabama ⁴ ****** show an enforcement trajectory that now includes multi-lawyer sanctions orders and discipline referrals. ⁵

Across these orders, the judicial message is consistent: **if you sign it, you own it**—and “AI made it up” is not a defense to inadequate inquiry, lack of supervision, or lack of candor. Courts have treated AI output as just another input that must be validated, much like the work product of a nonlawyer assistant or outsourced drafter. ⁶

Ethics authorities have aligned with the courts. The **American Bar Association** ⁷’s Formal Opinion 512 and the **New York City Bar Association** ⁸’s Formal Opinion 2024-5 both emphasize that core duties—**competence, confidentiality, supervision, candor, communication, and reasonable fees**—apply fully when lawyers use generative AI tools. ⁹

Ethics baseline for lawyers using generative AI

The ABA’s Formal Opinion 512 frames generative AI as a tool that can improve efficiency but **does not dilute baseline professional obligations**—particularly (i) competence (understanding material risks such as hallucinations), (ii) confidentiality and data exposure, (iii) supervision of lawyers/nonlawyers and vendors, (iv) candor to tribunals, (v) client communications, and (vi) reasonable fees (including not charging for time not actually spent). ¹⁰

New York City Bar Formal Opinion 2024-5 similarly gives New York-specific guidance and explicitly anchors the analysis in the New York Rules of Professional Conduct (including competence, confidentiality, supervision, candor, and the duty to avoid non-meritorious contentions). It emphasizes “guardrails” rather than entirely new rules—because existing duties already govern the problem. ¹¹

These ethics frameworks matter because many sanctions orders explicitly connect hallucinated citations to **Rule 11 “reasonable inquiry” duties, inherent-authority sanctions, appellate sanctions authority, and professional conduct expectations.** ¹²

Sanctions and discipline actions tied to hallucinated or fabricated AI output

The table below collects reported U.S. matters (through **Feb 11, 2026**) in which courts imposed sanctions, fines, discipline referrals, or other concrete enforcement measures after filings contained hallucinated/fabricated authorities or quotations connected to generative AI or AI-assisted workflows.

Table of enforcement actions

Case (primary order / opinion)	Court + docket	Decision date	Sanction / enforcement	What happened (2–3 sentence squib)	Rule / authority implicated	COUNSEL letters triggered (why)
Mata v. Avianca, Inc. <small>13</small>	S.D.N.Y. (No. 1:22-cv-1461)	Jun 22, 2023	Monetary sanctions + corrective steps	Lawyers filed a brief citing multiple nonexistent decisions generated via ChatGPT and then compounded the problem by filing follow-up submissions that still relied on fabricated authority instead of verifying. The court sanctioned counsel under Rule 11 principles and stressed that fabricated citations undermine the adversary system and waste judicial resources. <small>13</small>	Fed. R. Civ. P. 11; court's inherent authority; candor duties	U + S + O + N + L: understanding hallucination risk; scrutiny/verification; oversight of drafting; notice/candor; learning/remediation.

Case (primary order / opinion)	Court + docket	Decision date	Sanction / enforcement	What happened (2-3 sentence squib)	Rule / authority implicated	COUNSEL letters triggered (why)
Park v. Kim 14	2d Cir. No. 22-2057	Jan 30, 2024	Referral to grievance / disciplinary panel	Counsel cited a nonexistent precedent ; the court highlighted the basic duty to verify citations before filing and referred the matter for professional discipline review. The opinion underscores that AI-assisted drafting does not excuse inaccurate legal authority. 14	Appellate authority; professional discipline referral mechanisms	S + U + N: verify authorities; competence with tools; candor and remediation after error.
Gauthier v. Goodyear Tire & Rubber Co. 15	E.D. Tex. No. 1:23-cv-00281	Nov 25, 2024	\$2,000 fine + AI CLE / education requirement	Plaintiff's counsel filed a response containing fabricated case citations and quotations produced by an AI research tool and failed to confirm accuracy before filing. After the court's show-cause process, the judge imposed monetary sanctions and required AI-related education. 16	Fed. R. Civ. P. 11; local rules on verification/candor	U + S + L: tool competence; citation scrutiny; remediation via training.

Case (primary order / opinion)	Court + docket	Decision date	Sanction / enforcement	What happened (2-3 sentence squib)	Rule / authority implicated	COUNSEL letters triggered (why)
United States v. Hayes (sanctions order) ¹⁷	E.D. Cal. No. 2:24-cr-0280-DJC	Jan 17, 2025	\$1,500 sanction + bar notice + distribution to judges	Defense counsel cited a hallucinated case (“United States v. Harris...”) and attributed quotations that did not exist; the court found counsel’s follow-up explanations misleading and treated the conduct as sanctionable under inherent authority and local disciplinary rules. The order also directed service on bar authorities and circulation within the district. ¹⁸	Inherent authority; E.D. Cal. local disciplinary rules; candor rules	S + N + U + O + L: verify; candor in responses; competence; oversight; training and deterrence mechanisms.

Case (primary order / opinion)	Court + docket	Decision date	Sanction / enforcement	What happened (2-3 sentence squib)	Rule / authority implicated	COUNSEL letters triggered (why)
Nguyen v. Savage Enterprises <small>19</small>	E.D. Ark. No. 4:24-cv-00815-BSM	Mar 3, 2025	\$1,000 Rule 11 sanction	Plaintiff's filing cited four cases that did not exist ; after a show-cause order, counsel pointed to artificial intelligence and workload/ personal issues as contributing factors. The court imposed a monetary sanction at the low end of comparable Rule 11 sanctions. <small>20</small>	Fed. R. Civ. P. 11(b)-(c)	S + U + O: verify every citation; understand hallucination risk; supervisory controls over drafting.

Case (primary order / opinion)	Court + docket	Decision date	Sanction / enforcement	What happened (2-3 sentence squib)	Rule / authority implicated	COUNSEL letters triggered (why)
Wadsworth v. Walmart Inc. <small>21</small>	D. Wyo. No. 2:23-cv-00118-KHR	Feb 24, 2025	Pro hac vice revocation + tiered monetary fines	Multiple motions cited numerous nonexistent cases ; the court emphasized that even attorneys who did not draft the motion but permitted signature delegation still had a nondelegable duty to ensure filings are supported by existing law. The court imposed tiered fines and revoked pro hac vice admission for the most culpable drafter.	Fed. R. Civ. P. 11; ethics competence principles; pro hac vice authority	O + S + U + L: signature/ oversight failures; verify; competence; deterrence via discipline/ training.

Case (primary order / opinion)	Court + docket	Decision date	Sanction / enforcement	What happened (2-3 sentence squib)	Rule / authority implicated	COUNSEL letters triggered (why)
Mid Central Operating Engineers Health & Welfare Fund v. HoosierVac LLC ²²	S.D. Ind. No. 2:24-cv-00326-JPH-MJD	May 28, 2025	Personal sanction (reduced to \$6,000)	Counsel submitted filings containing nonexistent authorities and failed to satisfy Rule 11's reasonable-inquiry duty; a magistrate recommended a higher sanction that the district judge adopted in part while reducing the amount based on later remedial steps. The order reflects courts' increasing willingness to sanction the attorney personally. ²²	Fed. R. Civ. P. 11; inherent authority	S + O + L: verification failure; supervising responsibility; remediation expectations.

Case (primary order / opinion)	Court + docket	Decision date	Sanction / enforcement	What happened (2-3 sentence squib)	Rule / authority implicated	COUNSEL letters triggered (why)
Dehghani v. Castro (magistrate sanctions order; affirmed on review) ²³	D.N.M. No. 2:25-cv-00052	Apr 2, 2025 (sanctions); May 9, 2025 (affirmance)	\$1,500 + CLE + self-reporting / third-party reporting	Counsel outsourced a brief via a freelance platform and did not verify cited cases or quotations; multiple cited authorities were nonexistent or did not support the propositions asserted. The court imposed Rule 11 sanctions and required reporting/ education; the district judge affirmed key sanctions on review. ²³	Fed. R. Civ. P. 11; supervision of outsourced work	O + S + U + N + L: supervise vendors; verify; competence; notice/self-reporting; education.

Case (primary order / opinion)	Court + docket	Decision date	Sanction / enforcement	What happened (2-3 sentence squib)	Rule / authority implicated	COUNSEL letters triggered (why)
Bunce v. Visual Technology Innovations, Inc. (docketed sanctions order) ²⁴	E.D. Pa. No. 2:23-cv-01740	Feb 27, 2025	\$2,500 + required AI ethics CLE	Courts and later decisions describe this matter as involving filings with nonexistent authority generated using ChatGPT , leading to a monetary sanction and CLE requirement. The case is frequently cited as a Third Circuit-region example of sanctionable AI hallucinations. ²⁵	Fed. R. Civ. P. 11; court's authority over counsel conduct	S + U + L: verification; competence; training/ learning requirement.

Case (primary order / opinion)	Court + docket	Decision date	Sanction / enforcement	What happened (2-3 sentence squib)	Rule / authority implicated	COUNSEL letters triggered (why)
Garner v. Kadince ²⁶	Utah Ct. App. (No. 20230837-CA)	May 22, 2025	Sanctions (state appellate enforcement)	The court sanctioned counsel after briefing included authorities that could not be substantiated and reflected inadequate verification practices. The decision has been cited in later materials as part of the judicial response to AI-era fabricated authority. ²⁶	State rules governing frivolous/noncompliant filings	S + U + O: verify; competence with tools; oversight of research/drafting.

Case (primary order / opinion)	Court + docket	Decision date	Sanction / enforcement	What happened (2-3 sentence squib)	Rule / authority implicated	COUNSEL letters triggered (why)
Johnson v. Dunn (sanctions order) ²⁷	N.D. Ala. No. 2:21-cv-01701-AMM	Jul 23, 2025	Public reprimand + disqualification + bar referral	Defense counsel conceded the cited cases were ChatGPT hallucinations and that no verification occurred before filing. The court viewed fabricated authority as grave misconduct and imposed escalating sanctions including removal from the case and referral to licensing authorities. ²⁸	Inherent authority; Rule 11 principles; discipline referral	S + O + N + U + L: verify; supervise; candor/ notification; competence; deterrence/ learning.
Elizondo v. City of Laredo ²⁹	S.D. Tex. Civ. No. 25-50	Jul 23, 2025	Monetary sanction + CLE requirement (reported in later orders)	Later federal orders describe this case as imposing sanctions where counsel relied on hallucinated authorities and failed to verify citations/quotes before filing. It is regularly cited as part of the "sanctions range" for AI hallucination cases. ³⁰	Rule 11 / court authority (as described in later orders)	S + U + L: verification; competence; mandated learning.

Case (primary order / opinion)	Court + docket	Decision date	Sanction / enforcement	What happened (2-3 sentence squib)	Rule / authority implicated	COUNSEL letters triggered (why)
In re Martin (Bankr. Rule 9011 sanctions opinion) ³¹	Bankr. N.D. Ill. No. 23-? (court opinion)	Jul 18, 2025	Bankruptcy Rule 9011 sanctions	The bankruptcy court addressed attorney filings containing AI-hallucinated citations , stressing the duty to verify and the analogy to supervising nonlawyer assistants. The opinion is frequently cited by other courts discussing sanctions for fabricated authorities. ³¹	Fed. R. Bankr. P. 9011; court authority	S + O + U + L: verification; supervision; competence; deterrence education.
GARDNER v. COMBS et al. (Blackburn OSC → sanctions order) ³²	D.N.J. No. 2:24-cv-07729	Dec 15, 2025	Sanctions order following OSC	The court addressed AI-era filing defects after issuing an OSC, and the resulting order reflects judicial willingness to sanction counsel where submissions contain unreliable authority and fail minimum professional inquiry standards. ³³	Rule 11 / OSC-based sanctions authority	S + U + N: verify; competence; corrective notice after OSC.

Case (primary order / opinion)	Court + docket	Decision date	Sanction / enforcement	What happened (2-3 sentence squib)	Rule / authority implicated	COUNSEL letters triggered (why)
Safe Choice, LLC v. City of Cleveland ³⁴	N.D. Ohio No. 1:24-cv-02033	Oct 30, 2025	Rule 11 sanctions + bar/grievance notice	After issuing a show-cause order, the court found Rule 11 violations and imposed sanctions; it also directed service of the sanctions materials to a local bar grievance committee. The order is explicit that the court retains authority to sanction abuse of the judicial process.	Fed. R. Civ. P. 11; collateral sanctions jurisdiction	S + N + L: verification; notice/reporting; deterrence/learning.

³⁴

Case (primary order / opinion)	Court + docket	Decision date	Sanction / enforcement	What happened (2-3 sentence squib)	Rule / authority implicated	COUNSEL letters triggered (why)
Wilson v. KIPP Texas Public Schools ³⁵	N.D. Tex. No. 3:24-cv-01638	Oct 29, 2025	Sanctions tied to AI-generated false quotations (and compliance failures)	The court sanctioned counsel after a declaration and briefing included artificially generated quotations presented as accurate and after failures to comply with required disclosure/ verification expectations. The order illustrates that “hallucinations” are not limited to case citations and can include fabricated record quotations. ³⁵	Rule 11 / local rules; candor obligations	S + N + O + U: verify quotes; disclose/ correct; supervise drafting; competence.

Case (primary order / opinion)	Court + docket	Decision date	Sanction / enforcement	What happened (2-3 sentence squib)	Rule / authority implicated	COUNSEL letters triggered (why)
ORDER sanctioning Attorney Edward A. Quesada ³⁶	N.D. Cal. No. 3:22-cv-05206	Oct 10, 2025	\$1,000 + client notice + AI CLE + state bar service	The court found counsel cited nonexistent authority / misrepresented holdings , with the only identified source being an AI-generated summary tool, and imposed sanctions plus mandatory education and State Bar notification. The decision is explicit that whether the lawyer "intended" AI use is beside the point when the filing contains false authority.	Fed. R. Civ. P. 11; standing orders; ethics duties	S + U + N + L: verification; competence; client/bar notice; required training.

37

Case (primary order / opinion)	Court + docket	Decision date	Sanction / enforcement	What happened (2-3 sentence squib)	Rule / authority implicated	COUNSEL letters triggered (why)
Buchanan v. Vuori, Inc. (Dal Bon sanctions) ³⁸	N.D. Cal. No. 23-cv-01121-NC	2025 (order date on PDF)	Monetary sanctions (attorney-specific)	The court imposed sanctions after a filing included a nonexistent case citation and multiple fabricated quotations supposedly attributable to a real case. The order reflects heightened scrutiny of “quote hallucinations” and not just fake citations. ³⁸	Rule 11 / court authority	S + U + O: verify quotes; competence; oversight of drafting and cite-checking.
In re: Sanctions Order of Kenney ³⁹	La. Ct. App. (5th Cir.)	Oct 23, 2025	State appellate sanctions	The Louisiana appellate decision upheld sanctions tied to the use of fake citations in trial-court filings , situating the case within the growing national trend of courts responding to fabricated authorities. It explicitly references the federal sanction “range” as context for proportionality. ³⁹	State sanctions authority; professional responsibility expectations	S + U + L: verification; competence; deterrence rationale.

Case (primary order / opinion)	Court + docket	Decision date	Sanction / enforcement	What happened (2-3 sentence squib)	Rule / authority implicated	COUNSEL letters triggered (why)
Chukwuemeka Mezu v. Kristen Mezu <small>40</small>	Md. Appellate Court	Oct 29, 2025	Explicit judicial criticism (opinion-level guidance)	The appellate opinion addresses the growing problem of fictitious AI-generated citations , collecting federal sanction cases and reinforcing that lawyers must verify sources and maintain candor. It functions as a state appellate “warning order” with detailed doctrinal guidance. <small>41</small>	Candor / reliability requirements; cites sanction precedents	S + U + L: verify; competence; learning signal to the bar.

Case (primary order / opinion)	Court + docket	Decision date	Sanction / enforcement	What happened (2-3 sentence squib)	Rule / authority implicated	COUNSEL letters triggered (why)
Lexos Media IP v. Overstock ⁴²	D. Kan. No. 22-cv-2324	Feb 2, 2026	Multi-lawyer fines totaling \$12,000 (Rule 11)	The court fined multiple attorneys after pleadings included fabricated and misrepresented legal authority that was signed and submitted without adequate verification. The court allocated sanctions based on each lawyer's role and emphasized proportional accountability. ⁴²	Fed. R. Civ. P. 11; signature responsibility	S + O + U + N: verify; supervise workflow; competence; candor and corrective steps.
Amarsingh v. Frontier Airlines ⁴³	10th Cir. No. 24-1391	Feb 9, 2026	Appellate sanctions	The Tenth Circuit imposed sanctions on appeal after briefing relied on authorities and arguments that did not meet minimum standards of accuracy and nonfrivolous advocacy, citing the growing body of AI-hallucination sanction cases as context. ⁴³	Fed. R. App. P. 38; inherent appellate authority	S + U + L: verify; competence; deterrence at appellate level.

Mermaid timeline of key enforcement actions

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timeline
  title U.S. GenAI Hallucination Enforcement Actions (selected)
  2023-06-22 : Mata v. Avianca (S.D.N.Y.) – Rule 11 sanctions for fake cases
  2024-01-30 : Park v. Kim (2d Cir.) – discipline referral tied to bogus
  authority
  2024-11-25 : Gauthier v. Goodyear (E.D. Tex.) – monetary sanction + AI CLE
  2025-01-17 : United States v. Hayes (E.D. Cal.) – sanctions + bar
  notification
  2025-03-03 : Nguyen v. Savage Enterprises (E.D. Ark.) – $1,000 Rule 11
  sanction
  2025-02-24 : Wadsworth v. Walmart (D. Wyo.) – pro hac vice revocation +
  fines
  2025-04-02 : Dehghani v. Castro (D.N.M.) – Rule 11 sanctions + self-
  reporting
  2025-05-28 : HoosierVac (S.D. Ind.) – personal sanction (reduced) for fake
  authority
  2025-07-23 : Johnson v. Dunn (N.D. Ala.) – disqualification + bar referral
  2025-10-10 : Quesada (N.D. Cal.) – $1,000 + CLE + State Bar service
  2025-10-30 : Safe Choice (N.D. Ohio) – Rule 11 sanctions + grievance notice
  2026-02-02 : Lexos v. Overstock (D. Kan.) – $12,000 total fines (Rule 11)
  2026-02-09 : Amarsingh v. Frontier (10th Cir.) – appellate sanctions

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Near-miss and advisory orders

Not every hallucination incident ends in monetary sanctions. Courts have also issued **show-cause orders, stern admonishments, and “warning opinions”** meant to deter future misconduct—often emphasizing that the court may sanction more harshly next time.

New York City Bar Formal Opinion 2024-5 itself cites **U.S. v. Cohen (S.D.N.Y. 2024)** as an example where filings cited “cases that do not exist” after the client provided citations hallucinated by a public AI tool, and counsel failed to check them before submitting. The opinion uses this to reinforce the baseline requirement of citation verification and competence with AI-era tools. ¹¹

Several later sanctions decisions (and judicial training materials) likewise treat earlier “no-sanction” outcomes as **near-miss warnings**—emphasizing that pro se status, early correction, or limited prejudice may explain restraint, but not excuse the underlying verification duty. ⁴⁴

Governance analysis through the COUNSEL framework

Across the enforcement actions above, the failure mode is rarely “AI exists.” It is **governance failure**—in controls, supervision, and verification discipline—inside a litigation workflow.

The repeated patterns map cleanly to COUNSEL:

Confidentiality is not the typical trigger in hallucination sanctions orders (which focus on false authority), but the ethics opinions make clear that confidentiality risk rises when client data is entered into third-party systems without adequate safeguards or consent. ⁴⁵

Oversight is central when lawyers delegate drafting, outsource work, or allow signature delegation without review. Courts have treated this as a “nondelegable duty” problem (e.g., signers sanctioned even if they did not draft). ⁴⁶

Understanding shows up whenever counsel claims they did not appreciate hallucination risk or did not know how a tool works (or how it can fail). Both ethics opinions and sanctions orders reject “I didn’t know the tool makes things up” as incompatible with competence. ⁴⁷

Notice appears in obligations to correct the record, respond candidly to OSCs, notify clients, and—when ordered—notify courts or disciplinary authorities. Several sanctions orders explicitly include service on clients and bar entities as remedial terms. ⁴⁸

Scrutiny is the core: independent verification of citations, quotations, and factual assertions before filing. Nearly every sanctions order turns on the failure to perform this minimum verification step. ⁴⁹

Equity is seldom the explicit basis of these sanctions orders (which are accuracy-focused), but equity obligations remain relevant where AI use can embed bias in downstream advice or decision-making. The NYC Bar opinion explicitly includes nondiscrimination concerns in its rules list. ¹¹

Learning is increasingly built into sanctions remedies: courts frequently order CLE or other education requirements, reflecting a judicial view that deterrence requires ongoing professional training. ⁵⁰

Methodology and limitations

This report was prepared for publication-quality compliance use and covers developments **through Feb 11, 2026**.

Primary-source collection prioritized official and semi-official repositories (including **GovInfo**, court-hosted PDFs, and **Justia dockets/opinions**) and then corroborated context with reputable legal news reporting (notably **Reuters**) where useful. ⁵¹

Search methodology relied on keyword and citation chaining from the orders themselves. Representative search terms included combinations of: “ChatGPT,” “generative AI,” “hallucinated,” “nonexistent case,” “fabricated citation,” “Rule 11 sanctions,” “show cause,” “artificial intelligence quotations,” and targeted searches for known case names and dockets (e.g., “Wadsworth 2:23-cv-00118 KHR,” “Hayes 2:24-cr-0280 DJC,” “Lexos Overstock sanctions order”). ⁵²

Inclusion criteria: (i) U.S. federal or state court matter, (ii) attorney involvement (not solely self-represented litigant behavior), (iii) an order imposing sanctions/fines/referrals or otherwise issuing explicit judicial criticism tied to fabricated citations/quotes or reliability failures connected to generative AI or AI-assisted workflows, and (iv) a reasonably accessible primary document (or, where not accessible, explicit flagging as secondary-only). ⁵³

Limitations: there is **no single authoritative “exhaustive” public database** of AI-hallucination sanction orders; some relevant orders remain behind PACER or commercial reporters, and some state trial-level actions are difficult to retrieve. Where this report relies on later court orders summarizing earlier sanctions decisions (rather than reproducing the original order), that reliance is made explicit in the table narrative.

54

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