

# CLE – What Your Law Clerks Know About AI in Legal Writing

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# Biography

- George Brown, Jr. '17
- Professor of Skills, University at Buffalo School of Law.
- I teach Mastering Legal Research and Writing for Private Practice, one of our offerings to satisfy the LAWR III requirements.
- In the fall, I will also teach a writing class called “Transactional Drafting.”
- Before joining the faculty, I practiced commercial real estate and corporate law at Harris Beach PLLC, in both their Buffalo and Rochester offices, and I served as in-house counsel for Life Storage, Inc.



# Introduction

- Generative AI presents both opportunities and challenges for legal professionals.
- Courts have expressed legitimate concerns about improper use of AI.
- Two important areas to address with students when discussing AI in legal practice:
  - (1) ethical concerns and obligations when using generative AI, and
  - (2) effective ways to use generative AI in legal practice.

# Judicial Concerns – Science Fiction Brought to Life?

Magistrate Judge Gabriel A. Fuentes (N.D. Illinois)

- “Parties should not assume that mere reliance on an AI tool will be presumed to constitute a reasonable inquiry [under FRCP 11(b)(2)], because, to quote a phrase, “I’m sorry, Dave, I’m afraid I can’t do that . . . . This mission is too important for me to allow you to jeopardize it.”  
Standing Order for Civil Cases Before Magistrate Judge Fuentes
  - Quote is from 2001: A Space Odyssey
- Judge Fuentes quotes Mata v. Avianca to show that the mission of federal courts is jeopardized whenever attorneys use AI to generate legal research that includes “bogus judicial opinions cited for substantive propositions of law.”

# Judicial Concerns – Science Fiction Brought to Life?

District Court Judge Kai N. Scott (E.D. Pennsylvania)

- “My dear Miss Glory, the Robots are not people. Mechanically they are more perfect than we are; they have an enormously developed intelligence, but they have no soul.” *Bunce v. Visual Tech. Innovations, Inc.*, 2025 WL 662398 at \*1 (E.D. Pa. Feb. 27, 2025)
  - Quote is from R.U.R. (ROSSUM’S UNIVERSAL ROBOTS): A FANTASTIC MELODRAMA IN THREE ACTS AND AN EPILOGUE 17
- Emphasizes that lawyers must be human and cannot substitute their professional judgment with technology
- Rule 11 requires lawyers to "stop, think, investigate, and research" – a lawyer cannot outsource their ethical obligations to algorithms

# Judicial Concerns – Science Fiction Brought to Life?

Mata v. Avianca, Inc., 678 F. Supp. 3d 443, 448-49 (S.D.N.Y. 2023)

- Mata details the potential jeopardy that can arise from citing fake cases.
  - The opposing party wastes time and money in exposing the deception.
  - The Court's time is taken from other important endeavors.
  - The client may be deprived of arguments based on real precedent.
  - Potential harm to the reputation of judges and courts who are falsely named as authors and the parties named in the fake opinions.
  - Promotes cynicism about the legal profession and the American judicial system.
  - Future litigants may be tempted to defy a judicial ruling by disingenuously claiming the opinion was based on invalid law.

# AI Sanctions Cases for Fall and Spring 2024 Classes

- Multiple attorneys have already faced sanctions for unverified AI content
- Courts consistently affirm: AI use is acceptable, but verification is mandatory
- Sanctions have included:
  - Monetary penalties;
  - Informing other judges of sanctions and disciplinary actions;
  - Case dismissals; and
  - Referrals to attorney grievance panels
- Reputational consequences can be career-defining

# Mata v. Avianca, Inc., 678 F.Supp.3d 443 (S.D.N.Y. 2023)

- First major AI hallucination case to draw national attention
- Attorneys submitted brief with six fictitious cases generated by ChatGPT
- Court imposed \$5,000 fine under Fed. R. Civ. P. Rule 11(c)
- Required attorneys to write letters to falsely identified judges
- Court emphasized that there is “nothing inherently improper about using a reliable AI tool” but verification for veracity is required
- Found attorneys acted in “bad faith” through “conscious avoidance”
- Court highlighted NY Rules of Professional Conduct Rule 3.3(a)(1) prohibiting false statements of fact or law and requires a lawyer to correct any false statement previously made to the court.

# Park v. Kim, 91 F.4th 610 (2d Cir. 2024)

- Second Circuit affirmed EDNY decision referring attorney to grievance panel
- Attorney used ChatGPT without verifying case validity
- Court found this behavior “falls below the basic obligations of counsel” and the Fed. R. Civ. P. Rule 11 requires an attorney to make a reasonable inquiry to confirm the “existence and validity of the legal authorities on which they rely.”
- Court rejected the attorney’s argument that special AI warnings were needed to inform attorneys to use caution when using AI
  - Court found that “such a rule is not necessary to inform a licensed attorney, who is a member of the bar of the Court, that she must ensure that her submissions to the Court are accurate.

# Grant v. City of Long Beach, 96 F.4th 1255 (9th Cir. 2024)

- Ninth Circuit dismissed case with prejudice because the Plaintiff's counsel submitted a brief that was "replete with misrepresentations and fabricated case law."
- Attorney failed to acknowledge fabrications when directly questioned during oral arguments or when issued a focus order regarding these fabrications and misrepresentations.
- Violated Fed. R. App. P. 28(a)(8)(A) requiring a brief to contain contentions and reasons for them, with citations to the authorities.
- Court struck brief and dismissed appeal
- In class, we take about 10 minutes to watch the oral arguments from the 9th Circuit on this case, where the Court directly questions the attorney regarding these fictitious cases.

# United States v. Cohen, 724 F.Supp.3d 251 (SDNY 2024)

- Contrasting case: attorney was not sanctioned despite AI hallucinations
- Michael Cohen's motion included three fictitious cases from Google's Bard
- Attorney David Schwartz included citations without verification
- **Critical difference:** Schwartz immediately informed the court and acknowledged the fake cases when he learned they were hallucinations, did not continue to assert their validity, and apologized for the error.
  - Because of this, the Court found he did not act in bad faith as required for sanctions under FRCP 11. Court found he did not act in "bad faith" required for Rule 11 sanctions
- Demonstrates importance of correcting errors promptly under the Federal Rules of Civil Procedure and the New York Rules of Professional Conduct

# Recent AI Sanction Cases for Fall 2025

Transamerica Life Ins. Co. v. Williams, 2024 WL 4108005 (D. Ariz. 2024)

- Court noted that the defendant's filings are "replete with citations to nonexistent caselaw and legal authorities that do not correspond to her claims"
- Explicitly suggested improper AI use
- Using AI to draft briefs is impermissible when fake cases are cited
- Threatened future sanctions, including dismissal, if future filings contained nonexistent cases

# Recent AI Sanction Cases for Fall 2025

Gauthier v. Goodyear Tire & Rubber Co., 2024 WL 4882651 (E.D. Tex. 2024)

- Attorney sanctioned for submitting a response brief that included nonexistent cases generated by AI
- Attorney used a generative AI tool to produce a response in opposition to a motion for summary judgment which included two nonexistent cases.
- The attorney filed a motion to amend his response to remove the citations to the nonexistent cases and quotations.
- The attorney admitted that he failed to verify the content but that he attempted to check the content using a feature available through Lexis AI. The Lexis AI feature failed to flag the issues

# Recent AI Sanction Cases for Fall 2025

United States v. Hayes, 2025 WL 235531 (E.D. Cal. 2025))

- Court questioned the defense counsel about the quotation and citation of a fictitious case (US v. Harris, 761 F.Supp, 409 (D.D.C. 1991)) and its allegation that the quote actually comes from US v. Broussard, 767 F.Supp. 1536, 1542 (D. Or. 1991).
- Counsel apologized for his lack of attention to the citations but failed to admit that the Harris case was fictitious, nor that the quote in Broussard did not exist.
- Court found the attorney acted in knowingly, deliberately, and in bad faith, justifying \$1,500 sanctions
  - Court also required a copy of the order be served on the District of Columbia Bar and State Bar of California, and that the order be served on all district judges and magistrate judges in the Eastern District of California.
- Demonstrates severe reputational consequences

# Recent AI Sanction Cases for Fall 2025

Wadsworth v. Walmart, Inc., 348 F.R.D. 489 (D. Wyo. 2025)

- An attorney drafted a Motion in Limine at the direction of his supervisor. He uploaded this brief into an in-house AI database called “MX2.law” to add case law. MX2.law inserted nine cases into the motion, eight of those cases were created whole cloth by the database.
- The drafter did not review the case law for veracity and submitted the motion, with fake caselaw, to the court. The motion was signed by the drafter, his supervising attorney, and the local counsel.
- Court found all three attorneys violated Fed. R. Civ. P. 11 by submitting a brief, signed by all three parties, to the court that included so many fabricated cases.
  - Society has an interest in attorneys’ ethical conduct and the court found their conduct fell short of this standard
- Drafter was sanctioned \$3,000 and had his pro hac vice admission revoked, supervising attorney and local counsel were each sanctioned \$1,000.
- This case is important for both students and supervising attorneys, as both have a nondelegable duty under Rule 11.

# Recent AI Sanction Cases for Fall 2025

Bunce v. Visual Tech. Innovations, Inc., 2025 WL 662398 (E.D. Penn. 2025)

- Attorney used ChatGPT to cite artificial cases in two separate motions
- Included overruled and mischaracterized cases
- Sanctions: \$2,500 fine plus required CLE on AI ethics

# Recent AI Sanction Cases for Fall 2025

Dehghani v. Castro, 2025 WL 988009 (D.N.M. 2025)

- Attorney purchased a brief from a company called “LAWCLERK” – offering freelance attorney services – for \$750.
- Brief contain several false cases, and the court issued an order to show cause, requesting PDF copies of the cases.
- When questioned about the brief, attorney said he made minimal revisions without verifying citations
- Claimed he concentrated on the ‘gist’ of the argument, and he could not imagine a licensed lawyer would make up cases.”
- Court found the attorney violated Fed R. Civ. P. 11(b)(2) by failing to confirm the validity of the cases cited in the brief and for the extra work he forced the Court to perform because of this violation.
- Sanctions:
  - Pay \$1,500 fine (double the cost of the brief he purchased)
  - Send a copy of this order to LAWCLERK, the freelance attorney, and their general support email
  - Complete a 1-hour CLE course related to legal ethics in writing or the use of AI in writing
  - Self-report to the New Mexico and Texas state bar disciplinary boards
  - Report the freelance attorney to the New York bar, including a copy of this order

# Recent AI Sanction Cases for Fall 2025

Mid Cent. Operating Engineers Health & Welfare Fund v. HoosierVac LLC, 2025 WL 574234 (S.D. Ind. 2025)

- Attorney filed a brief that cited to a nonexistent case. When the attorney was ordered to correct the citation, he filed a notice stating that he was unable to locate the case and that the referenced citation was in error.
- At the hearing on an order to show cause regarding potential sanctions under Rule 11, the attorney admitted that he had relied on programs utilizing generative AI to draft the briefs, and that he did not know that AI could generate fictitious cases and citations.
  - The attorney admitted that he did not conduct further research or make attempts to verify the existence of the citations.
- Court found he failed to make a reasonable inquiry as required by Rule 11 and was sanctioned \$15,000.

# Recent AI Sanction Cases for Fall 2025

Nguyen v. Savage Enters., 2025 WL 679024 (E.D. Ark. 2025)

- Plaintiff's attorney was sanctioned \$1,000 for violating Fed. R. Civ. P. 11(b)(2) by filing a response to a motion to dismiss with citations to non-existent cases. Attorney claimed that use of AI, along with heavy workload and personal issues, may have caused these errors.
- Court quoted Mata stating “[a]n attempt to persuade a court or oppose an adversary by relying on fake opinions is an abuse of the adversary system.”

# Standing Orders and Other Court Orders on AI Use

- **Certification requirements:** Majority approach
  - Must verify all AI-generated content (citations, analysis)
  - Must disclose AI use and specify which parts were AI-generated
  - Must identify specific AI tools used
- **Complete prohibitions:** Minority approach
  - Western District of North Carolina
    - “No artificial intelligence was employed in doing the research for the preparation of this document, with exception of such artificial intelligence embedded in the standard on-line legal resources Westlaw, Lexis, Fastcase, and Bloomberg”
  - Eastern District of Virginia: Similar language
  - Northern District of Ohio
    - “No attorney for a party, or a pro se party, may use Artificial Intelligence (“AI”) in the preparation of any filing submitted to the Court”
- Important to review the Local Rules before making any filing to determine what you must comply with regarding AI use.

# New York Standing Orders Regarding AI Use

- **Kings County Supreme Court** (Hon. Aaron D. Maslow)
  - Requires a certification that either no generative AI was used or, if generative AI was used, that all text, citations, quotations, and legal analysis was reviewed for accuracy and approved by an attorney
  - Must identify program and specify which parts were AI-generated
- **Southern District of New York** (Hon. Arun Subramanian)
  - Emphasizes that use of generative AI is not prohibited, but confirm the personal responsibility for verification on attorneys
  - Lead Trial Counsel bears ultimate responsibility for any filing before the court

# New York Standing Orders Regarding AI Use

- **Westchester County Supreme Court** (Hons. Helen Blackwood and David Zuckerman)
  - Must disclose to the court if any part of filing was generated by AI and, if so, what portions were drafted using AI.
- **Integrated Domestic Violence Court** (Hon. Tandra L. Dawson)
  - If AI was used for research or drafting, must submit an affirmation at the end of the document stating that AI was used.
  - Affirmation should also include that the document was reviewed and verified for accuracy prior to submission.

# New York Standing Orders Regarding AI Use

- **Bankruptcy Court, Southern District of New York**
  - Reminds litigants they remain responsible for document accuracy when using technology
  - Explicitly warns about AI producing "factually or legally inaccurate content"
  - Emphasizes continued obligation under Fed. R. Bankr. P. 9011
- **Niagara County Supreme Court (Hon. Michael J. Norris)**
  - When using AI, attorney must:
    - disclose the use of AI;
    - disclose the specific AI tool used;
    - Identify the portion of the filing drafted by AI; and
    - Include a certification that the AI work product was diligently reviewed by a human being for accuracy and applicability

# Bar Association Guidance

## ABA Formal Opinion 512 (July 2024)

- Competence (Rule 1.1): Lawyers must understand AI capabilities and limitations
- Confidentiality (Rule 1.6): Evaluate risks before inputting client information
- Communication (Rule 1.4): Disclose AI use when it influences significant decisions
- Meritorious Claims (Model Rule 3.3, 8.4) Review all outputs for accuracy before court submission
- Supervision (Rules 5.1, 5.3): Establish clear AI policies and training
- Fees (Rule 1.5): Explain basis for AI-related charges; can't bill for learning time

# Bar Association Guidance

## NYCBA Formal Opinion 2024-5

- Duty of Confidentiality (Rule 1.6): Cannot input client information into systems that share with third parties
- Conflicts of Interest (Rule 1.6, 1.8, 1.9, 1.10, 1.11, 1.12): When using any in-house AI program, must make sure that any screening requirements are maintained by the platform
- Duties of Competence and Diligence (Rule 1.1, 1.3): Must scrutinize outputs for accuracy and bias
- Advertising and Solicitation (Rule 7.1, 7.3): Cannot use AI to circumvent ethical responsibilities surrounding advertising and solicitation
- Candor to the Tribunal; Meritorious Claims and Contentions (Rule 1.2(c), 3.1, 3.3, 1.16): Must review all outputs before client/court submission and correct errors promptly
- Duty to Supervise Lawyers and Nonlawyers (Rule 5.1, 5.2, 5.3, 8.4): Establish clear AI policies and training
- Communication Regarding Generative AI Use (Rule 1.4, 1.2): Lawyer should determine whether they should, or must, disclose use of AI to client.
- Charging for Work Product by Generative AI and Generative AI Costs (Rule 1.5): May only charge for actual time spent crafting prompts and editing outputs
- Prohibition on Discrimination (Rule 8.4): Must be aware of potential biases in AI training data

# Generative AI as a Legal Tool

- AI should be viewed as an addition to the lawyer's toolbox
- Already valuable for improving legal research and writing
- Requires awareness of ethical obligations and potential pitfalls
- While AI comes with these concerns and pitfalls, it has the potential to become a valuable tool for the efficient practice of law
  - Lawyers should avoid the natural inclination to avoid or pushback on this new technology.
  - Just as it has become a coveted skill to be able to efficiently search legal databases with Boolean terms, efficient prompt drafting will become the coveted skill for the next generation of lawyers.

# Benefits for Legal Research

- Excellent starting point for research
- Helps expand initial results
- Question-and-answer format aligns with lawyers' Socratic training
- Can significantly reduce research time
- Provides useful starting points

# Critical Limitations: Hallucinations

## Two Main Forms:

- Completely fabricated cases
  - Fake citations that appear legitimate
  - Often attributed to real judges
- Misrepresentations of real cases
  - Claiming case law supports a position beneficial to the attorney, but case doesn't actual stand for the proposition AI alleges
  - Distorting actual legal standards to fit the question presented by the attorney

# Research on AI Legal Tools

- Stanford University's Human-Centered Artificial Intelligence researchers published a study on hallucinations in AI legal research tools
  - [Hallucination-Free? Assessing the Reliability of Leading AI Legal Research Tools](#)
- Study found that Lexis+ and Westlaw's CoCounsel allege in their advertising materials to have solved the hallucination problem
  - Much of this relies on how the databases learn and information available to it
  - Both platforms provide hyperlinks to real sources when it cites
- While these hyperlinks are typically real sources, it doesn't address the concern of misrepresentations.

# In-Class Misrepresentation – Legal AI Platforms

- Research question: Can a property owner could bring a claim against a third-party contractor who improperly disposed of oil-based paint by dumping it down a storm sewer on the property?
- AI initially suggested using NY Navigation Law § 181(5)
- When asked if oil-based paint falls under Navigation Law, AI reversed position, stating it did not fall under the purview of Navigation La
  - Cited Fairview Plaza, Inc. v. Estate of Rigos, 129 A.D.3d 1259 (3d Dep’t 2015) where the court found that a dry-cleaning chemical known as PERC, which is a volatile petroleum-derived compound, was not “petroleum” under the Navigation Law.

# In-Class Misrepresentation – Legal AI Platforms

- Legal Analysis vs. AI Response
  - AI attempted to provide definitive answer without nuanced legal analysis
  - Failed to consider:
    - Navigation Law § 172(15)'s broad definition of petroleum
    - Oil-based paint classification as "universal waste" (6 NYCRR § 374-3.1)
    - Navigation Law § 195 requiring liberal construction of statute
- When asked follow-up question – “Can a property owner seek remediation costs from a third party that pollutes their property with oil-based paint?” - AI contradicted its previous position, stating yes, the property owner could seek remediation costs from a third party that pollutes their property with oil-based paint under Navigation Law § 181.

# In-Class Misrepresentation – Legal AI Platforms

- Research question: Requirements under New York law for an enforceable indemnification clause in a service agreement
  - AI correctly identified key legal principles:
    - Courts strictly construe such clauses
    - The scope of indemnity should be specified
    - Language must be explicit for covering indemnitee's negligence
- Critical error: AI incorrectly stated that indemnification clauses must comply with NY General Obligations Law § 5-322.1
  - The statute only applies to specific contracts (construction, alteration, repair, maintenance)
  - Many students fell into this trap, missing the statute's limited applicability

# In-Class Fabrication – ChatGPT

- Research question: What does New York law require for a liquidated damages clause to be enforceable in a construction contract?
- I plugged this question into ChatGPT to see how it would respond.
- ChatGPT's initial response was a summary of valid considerations, but no sources or citations to support these considerations.
- Those considerations include:
  - Reasonable estimate of anticipated harm;
  - Damages are difficult to anticipate or estimate at time contract is formed;
  - Whether award is proportionate to actual damages

# In-Class Fabrication – ChatGPT

- I followed up this response by asking for citations to case law to support this summary.
- ChatGPT responded with a mix of real and fabricated cases, all with what appeared to be legitimate citations.
  - Truck Rent-A-Center, Inc. v. Puritan Farms 2nd, Inc., 41 NY2d 420 (1977)
    - This is one of the seminal Court of Appeals cases on liquidated damages clauses.
  - Kreiger v. DLS, LLC, 2018 NY Slip Op 33759 (U) (Sup. Ct. 2018)
    - Completely fabricated – citation leads to criminal trial
  - Matter of the People v. Silverman, 196 AD2d 229 (1st Dep't 1994)
    - Completely fabricated – citation is to a Fourth Department case about municipal liability
  - Cahil v. Regan, 5 NY3d 292 (2005)
    - Completely fabricated – citation brings you to dissent of Dalton v. Pataki, 5 NY3d 243 (2005)

# In-Class Fabrication – ChatGPT

- Tessler & Son, Inc. v. LMS Contracting Corp., 209 AD2d 261 (1st Dep't 1994)
  - Completely fabricated – citation brings you to Rodriguez v. New York City Hous. Auth., 209 AD2d 260 (1st Dep't 1994)
- Wells Fargo Bank, N.A. v. Hellman, 2019 NY Slip Op 32813(U) (Sup. Ct. 2019)
  - Completely fabricated – citation brings you to Jobar Holding Corp. v. Halio, 2019 WL 4600820, 2019 NY Slip Op 32813 (U) (Sup. Ct., NY Cnty. Sept. 23, 2019)

# In-Class Misrepresentations - ChatGPT

- ChatGPT is also susceptible to misrepresentations
- While many of the cases provided regarding liquidated damages clause were fabrications, some were misrepresentations of real cases
- Kenford Co. v. County of Erie, 73 NY2d 312 (1989)
  - Real NY Court of Appeals case, but it does not deal with liquidated damages, but rather deals with a breach of contract claim for general damages
- Corinno Civetta Constr. Corp, v. City of New York, 67 NY2d 297 (1986)
  - Real NY Court of Appeals case, but it does not deal with liquidated damages, but rather deals with "no damages for delay" clause

# Comparative Analysis: AI Legal Research Platforms - General vs. Specialized Legal AI Tools

Feature	General AI (ChatGPT)	Legal-Specific AI (Lexis+, CoCounsel)
Citation accuracy	Frequent complete fabrications	Better but still imperfect
Case analysis	Often misrepresents holdings	More accurate but can still misinterpret
Access to sources	Limited legal database	Access to comprehensive legal libraries
Verification	No built-in verification	Some built-in verification via hyperlinks
Consistency	Less consistent responses	More consistent but still variable
Best use case	Initial brainstorming	Preliminary research with verification

# Key Takeaways from Classroom Examples

- AI platforms can:
  - Completely fabricate case citations
  - Misinterpret the scope of statutes
  - Misrepresent the holdings of real cases
  - Double down on errors when challenged
  - Provide inconsistent answers to similar questions
- These issues exist across platforms (ChatGPT, Lexis+ Protégé, Westlaw CoCounsel)
- Even specialized legal AI tools are not immune from hallucinations

# Effective AI Use and Prompt Construction

## Pre-Prompting Planning

- Understand platform limitations
  - Legal AI (Lexis+, CoCounsel): Access to comprehensive legal libraries
  - General AI (ChatGPT, Bard): Limited to publicly available information
  - Legal platforms: More trustworthy for legal research
  - General platforms: May excel at non-legal drafting (emails, letters)
- Understand interaction limitations
  - Follow-up question limits
  - Prompt length constraints
  - "Memory" fade in extended conversations

# Effective AI Use and Prompt Construction

## Pre-Prompting Planning

- Understand data privacy implications
  - Most platforms use prompt data for training
  - Review terms of service carefully
  - Avoid including confidential/privileged information
  - Obtain informed client consent when necessary
- Understand output accuracy limitations
  - All platforms can hallucinate
  - Legal platforms less likely to fabricate cases but may still mischaracterize
  - Hyperlinked citations in legal platforms provide ability to quickly verify if source exists, but doesn't guard against misrepresentations
  - Verification remains essential regardless of platform

# Effective AI Use and Prompt Construction

## Key Elements of Effective Prompts

- Specify desired tone
  - Professional documents vs. explanatory content
  - Plain language vs. technical legal terminology
- Define AI role
  - Ask it to respond as an expert in the field
  - Specify perspective (judge, lawyer, professor)
- Clarify format and output expectations
  - Legal memo, email, social media post
  - Length requirements
  - Citation format

# Effective AI Use and Prompt Construction

## Key Elements of Effective Prompts

- Provide context and jurisdiction
  - Specify relevant jurisdiction to avoid general summaries
  - Clearly defined legal area and context
  - Quality of output reflects quality of input
  - Break complex issues into smaller components
- Use follow-up questions strategically
  - Apply Socratic questioning techniques
  - Ask for elaboration on standards or tests
  - Test assumptions with fact-specific questions
  - Challenge AI to consider alternative perspectives

# Best Practices for Legal AI Research

- Treat AI as you would a secondary source or Google search
- Always verify every citation in legal research databases
- Never assume AI summaries or analyses are accurate
- Ask follow-up questions to narrow scope and test consistency
- Cross-check AI responses against primary sources
- Remember that AI cannot replace "thinking like a lawyer"
- Use AI to enhance efficiency, not to replace judgment
- Develop internal policies for AI use consistent with court requirements
- Request PDF copies of cases and AI prompts from law clerks using AI in research or drafting

# Questions and Discussion

- I can be reached by email at [gpbrown4@buffalo.edu](mailto:gpbrown4@buffalo.edu) if you have any additional thoughts or questions.
- Thank you for your time to discuss the interesting crossroad of AI and legal practice.