



News

Steve Puiszis Comments on the Risks of Submitting AI-Generated Case Law in Court Filings

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In a *Daily Business Review* column, Hinshaw's general counsel, Steve Puiszis, was among a select group of commentators to react to the latest instance of a law firm being sanctioned for a court filing that included hallucinated AI-generated case law.

Puiszis said that lawyers must verify AI-produced citations to avoid inaccuracies, and he stressed that traditional legal research practices remain vital. He also warned that local counsel could themselves face sanctions due to their e-signature on a court filing, highlighting that relying on others' reputations does not exempt lawyers from accountability.

Puiszis comments:

While not connected to the lawsuit, Chicago-based Hinshaw attorney Steven Puiszis thinks when the firm's policies or its training are forgotten—because lawyers are human and not robots—mistakes can occur, or as in this instance, hallucinated cases can be generated and find their way into a paper submitted to the court.

"We have seen a growing trend of district courts entering Rule 11 sanctions for pleadings or papers filed with hallucinated decisions which do not exist," Puiszis said. "The only way to mitigate this risk is for lawyers to check from independent sources any case citations and quotes produced by a generative AI tool or platform."

The Chicago-based attorney suggests lawyers should avoid doing legal research on gen AI tools or platforms that are intended for use by the general public.

"Technology, like gen AI, has not eliminated the need to cite, check, and read legal decisions," Puiszis said. "Additionally, lawyers should note that in this instance, local counsel who did not prepare or review the motion, was sanctioned because her e-signature appeared on the pleading.... Reliance on the skill and reputation of another lawyer will not avoid the imposition of Rule 11 sanctions."

[Read the full article](#) (*subscription may be required*).

- "[Morgan & Morgan Lawyers Sanctioned Over AI Citations](#)" was published by the *Daily Business Review* on February 25, 2025.

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