

Bench & Bar

The newsletter of the Illinois State Bar Association's Bench & Bar Section

The New Venue Statute: Fueling Age Old Debate Between Legislative and Judicial Authority

BY JUDGE JUDY CATES

Plaintiffs who have traditionally filed lawsuits in the counties where their clients reside no longer have that choice if the basis for bringing the suit challenges the constitutionality of a state law and names the state of Illinois as a defendant. The plaintiff's choice of a proper forum has now been restricted by a new venue provision enacted by the legislature, and

effective immediately.

On June 6, 2023, Gov. JB Pritzker signed House Bill 3062, and, with the stroke of a pen, a new venue statute went into effect (Pub. Act 102-5, §2, (eff. June 5, 2023) (adding 735 ILCS 5/2-101.5)). The new law applies a forum selection clause to lawsuits brought against the "State, or any

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Giving Back to the Profession

BY PAMELA SAKOWICZ MENAKER

After 32 years with Clifford Law Offices, I have been fortunate to have been mentored by a person who embraces giving back to the legal profession as well as to one's community. Toward that end, Robert A. Clifford, founder and senior partner at the firm, regularly encourages lawyers at the firm to join bar associations, to contribute articles to various publications with an eye toward educating even our competitors

and to speak at legal seminars far and wide. Lawyers at the firm serve on community boards ranging from school boards to school sports teams, non-profit boards that help people who have been abused to the Wounded Warrior Project.

Toward that end, during my tenure as president of the Catholic Lawyers Guild (2019-2020), the theme of my year was

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of its officers, employees, or agents acting in an official capacity” where the cause of action seeks declaratory or injunctive relief involving any state statute, rule or executive order based on an alleged violation of the Illinois Constitution or the Constitution of the United States. The new law provides that these causes of action must now be filed in either Sangamon County (Springfield) or Cook County (Chicago). It does not apply to claims arising out of collective bargaining disputes between the state and its employees. Notably, the doctrine of *forum non conveniens* is specifically excluded from actions subject to this section.

A sponsor of the Bill, Senate President Don Harmon, indicated that it was passed to prevent plaintiff’s attorneys from “forum shopping” by filing their cases in counties where they presumably find judges who are more sympathetic to their cause. (<https://www.chicagolawbulletin.com/new-law-limits-venue-constitutional-lawsuits-sangamon-cook-counties-20230607>). In recent years, there have been numerous cases filed in various counties throughout Illinois against the State, or its officers, challenging COVID-19 restrictions and restrictions on gun rights. These lawsuits have yielded differing results, depending on where the cause of action was filed. And, the Attorney General’s office has found itself defending identical lawsuits in numerous counties throughout the state. See *e.g.*, *JL Properties Group B., LLC v. Pritzker*, 2021 IL App (3d) 200305; *Fox Fire Tavern, LLC v. Pritzker*, 2020 IL App (2d) 200623; *Accuracy Firearms, LLC. v. Pritzker*, 2023 IL App (5th) 230035; *Guns Save Life, Inc. v. Raoul*, 2019 IL App (4th) 190334.

The new venue statute not only creates an exception to the general venue statute (735 ILCS 5/2-101 (West 2020)), it also expressly excludes the common law doctrine of *forum non conveniens*, providing that “the doctrine of *forum non conveniens* does not apply” to actions brought pursuant to this law. In *Gulf Oil Corp. v. Gilbert*, 330 U.S. 501 (1947), the United States

Supreme Court discussed the common law doctrine of *forum non conveniens*. The court identified the important factors to be considered, such as relative ease of access to sources of proof, attendance of witnesses, the possibility of viewing the premises, among others. The court also identified public interest factors, such as the relationship of the case to the chosen forum. But above all else, the court concluded that “unless the balance is strongly in favor of the defendant, the plaintiff’s choice of forum should rarely be disturbed.” *Gilbert*, 330 U.S. at 508-09.

In *Torres v. Walsh*, 98 Ill. 2d 338 (1983), the Illinois Supreme Court adopted the doctrine of intrastate *forum non conveniens* in Illinois, as described in *Gulf Oil*. Since *Torres*, Illinois courts have expanded the doctrine, noting it is an “equitable doctrine founded in considerations of fundamental fairness and sensible and effective judicial administration.” *First American Bank v. Guerrine*, 198 Ill. 2d 511, 515 (2002). Under this doctrine, trial courts evaluate the relevant private and public interest factors to determine whether a forum other than plaintiff’s chosen forum is more convenient to all parties. “The plaintiff has a substantial interest in choosing the forum where his rights will be vindicated, and the plaintiff’s forum choice should rarely be disturbed unless the other factors strongly favor transfer.” 198 Ill. 2d 517. Accordingly, “[t]he burden is on the defendant to show that relevant private and public interest factors ‘strongly favor’ the defendant’s choice of forum to warrant disturbing plaintiff’s choice.” *Langenhorst v. Norfolk Southern Ry. Co.*, 219 Ill. 2d 430, 444 (2006). Under the new venue statute, however, plaintiff has only one of two choices in selecting a forum, regardless of where the plaintiff resides or the cause of action arose.

In *Peile v. Skelgas, Inc.*, 163 Ill. 2d 323 (1994), our supreme court considered the existing tensions between the legislature and the judiciary as it related to a venue statute, 735 ILCS 5/2-108 (West 1992). The

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court reiterated, “The Illinois Constitution clearly empowers this court to promulgate procedural rules to facilitate the judiciary in the discharge of its constitutional duties. [Citation.] Because the constitution also authorizes the legislature to enact procedural statutes, this court and the legislature may share concurrent authority to promulgate rules of procedure.” 163 Ill. 2d at 334. Illinois Supreme Court Rule 187 (eff. Jan. 1, 2018) is an example of the Illinois Supreme Court’s authority to provide a procedural framework for filing a motion pursuant to the doctrine of *forum non conveniens*. The specific reference in the new law to the inapplicability of the *forum non conveniens* doctrine may represent a novel question in the age-old debate regarding the authority of the legislature vis-à-vis the authority granted

to the judiciary. As the *Peile* court cautioned, “[w]here possible, this court seeks to reconcile conflicts between procedural rules of the court and the procedural enactments of the legislature, but if a statute conflicts with a rule that involves a matter within the judicial authority, the statute must yield to the rule.” 163 Ill. 2d at 334.

In the new venue statute, the legislature selected either Sangamon County or Cook County for filing certain actions against the State. The statute provides no criteria for deciding between the two counties. And the doctrine of *forum non conveniens* does not apply. A constitutional challenge to this new statute has already been filed in Madison County. (Gary E. Myers v. Brendan Kelly, No. 2023 CH 35 (Cir. Ct. Madison County)). The plaintiff filed the action in his home forum

and seeks injunctive relief, thus triggering the new venue statute. No decision has been rendered yet on whether the Madison County plaintiff will be required to transfer his case. And, it remains unclear what rules will be used to determine whether Sangamon County or Cook County is the proper forum for transfer. But the current focus of the litigation is on the constitutionality of the new venue statute. The new statute may reignite an age-old debate between plaintiffs and defendant over the right to choose the forum for litigation. Does this new statute tread upon or conflict with the constitutional authority granted to the judiciary under the Illinois constitution? For now, that question remains unanswered. ■

Giving Back to the Profession

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volunteering — giving back. Every month the Guild offered a volunteer opportunity for members at various community organizations that need help — baking with children at Misericordia, serving hot meals at food banks and sponsoring games for children at a holiday party in Chicago’s Pilsen neighborhood we’re just some of the events. It all comes down to lawyers showing by example how they can use their heart and soul to help those less fortunate.

Certainly, it’s been said over and over how one feels better about themselves even trying to make others’ lives better, but it also needs to be said that it can improve the reputation of lawyers. The latest Gallup poll at this writing in honesty and ethics rankings of different professions found that only 19 percent of people responded high or very high about lawyers compared to the 30 percent that responded low or very low. Lawyers had significantly lower ratings than doctors, nurses, judges, and police officers. Giving back helps to break this stereotype. Judges fared better with 38 percent holding the bench in high esteem. <https://news.gallup.com/poll/1654/honesty-ethics-professions.aspx>.

It’s not difficult to find places where your services might be needed but it appears to

be most effective when you do something that you enjoy doing — helping the elderly, planting a tree, participating in a charity run, volunteering at an animal shelter or legal clinic, judging student mock trials, mentoring students — from grammar school through law school such as the Diversity Scholarship Foundation in Chicago sponsors — are just the tip of the iceberg. By mentoring and sharing knowledge and experiences with young lawyers, seasoned practitioners can help shape the next generation of legal professionals. This mentorship fosters a sense of professional responsibility, ethics, and accountability, ensuring that lawyers uphold the highest standards of integrity and professionalism.

Lawyers who give back to the profession through teaching or writing legal articles contribute to legal scholarship, enriching the legal discourse and promoting intellectual growth within the legal community. I’m again impressed by Clifford Law Offices that offers free ethics credits across five states every February with some 5,000 registrants, a free wellness credit in June as well as sponsoring the 30th year of the Clifford Tort Symposium that offers two days of free CLE on a timely topic in the civil justice arena and how it impacts the public, providing a vehicle

in an intellectually rigorous fashion with two dozen academics from around the country.

Lawyers giving back to the community through pro bono work play a vital role in promoting equal access to justice. Not everyone can afford legal representation, and this often leads to marginalized individuals being denied their rights. By providing free legal services to those in need, lawyers can bridge this justice gap. Pro bono work can encompass a wide range of legal services, such as representing indigent clients, advocating for policy reforms, or providing legal advice to nonprofit organizations. Participating in initiatives such as legal clinics, community legal education programs or volunteering in local organizations can foster a positive image of the legal profession. By interacting with community members, lawyers can gain a better understanding of the unique challenges faced by different groups and work towards addressing them effectively. This engagement builds bridges, breaks down stereotypes and promotes a sense of shared responsibility, ultimately leading to a stronger and more cohesive society. Lawyers giving back in this way also helps build trust and strengthen the relationship between the legal profession and society. Lawyers are often seen as the

gatekeepers of justice, and their involvement in community service activities can demonstrate their commitment to public service. The ISBA sponsors this type of service on Law Day (May 1) every year. It's amazing the number of calls received from throughout the state. Volunteers are always needed.

Lawyers giving back to the profession and the community can also benefit their personal and professional growth. Engaging in pro bono work or mentoring can provide lawyers with valuable experiences and

exposure to different legal issues. This exposure can broaden their perspectives, enhance their problem-solving skills and enable them to become more empathetic and compassionate professionals, not to mention strengthen their networks, expand their client bases, and gain recognition and respect within the legal community. Some lawyers who strike out on their own have been known to start this way — developing a base in their hometown and the word of their legal expertise grows from there.

Lawyers have a significant role to play in

society and giving back to the profession and the community is of utmost importance. The impact of lawyers giving back goes beyond individual cases or clients; it shapes the legal profession, strengthens communities, and helps create a more just and equitable society. Pro bono Celebration Week is just around the corner. As they say, when you want something done, give it to a busy person. That busy person this year could be you. <https://www.isba.org/probono>. ■

Fighting Bullying in the Legal Profession: An Opportunity for Change

BY ELI GOLDSTEIN

The Illinois Supreme Court Commission on Professionalism recently announced its new initiative, “Bullying in the Legal Profession: Its Prevalence, Impact, and Strategies for Prevention.” This initiative was created in response to growing concern about escalating bullying within the legal sector, particularly regarding race, age, and gender. Uncivil behavior and bullying tarnish the profession’s reputation and deter diversity in the field. The Commission on Professionalism aims to attack this issue by spreading awareness through education.

An experienced and diverse advisory council of bar leaders was assembled to help lead this initiative. The council’s first task is to design and conduct a statewide survey and hold focus groups to gauge the extent of bullying within the legal profession. By engaging with attorneys and other legal professionals, they aim to understand the true scope of the problem and gather insights on the best ways to address it. This groundbreaking research, possibly the first of its kind in the nation, will shape the Commission on Professionalism’s strategies for preventing and combatting bullying and will support the Commission’s broader educational efforts.

The advisory council is headed by

Erika Harold, executive director of the Commission on Professionalism, who is nationally recognized for her bullying prevention efforts nationwide. The council consists of a diverse array of distinguished attorneys, judges, professors, and other professionals from across the State, all deeply committed to addressing bullying within the legal profession. I had the opportunity to attend the first meeting of this council and witnessed firsthand the passion and determination each member brought to the table. During this meeting, each member shared personal experiences with bullying in the profession, providing shocking accounts of ongoing racism, sexism, homophobia, hazing, and more.

Among the council members is Illinois Appellate Court Justice Debra Walker, a seasoned member of the judiciary with 15 years on the bench. In a follow-up interview, I had the chance to delve deeper into her perspectives. She reflected on her early career, recalling an incident that occurred while she was a summer associate that transcended bullying: “I wouldn’t say that what I experienced was bullying, per se. I would say what I experienced was worse than bullying because it rose to the level of sexual harassment.” Justice Walker’s

experience provides insight into how deeply ingrained these problems are within the legal profession’s culture.

Furthermore, a troubling consensus emerged during the meeting: the uncivil behavior and discriminatory practices are worsening. This observation was corroborated by Justice Walker, who described “a general deterioration in behavior in the courtroom with respect to bullying.” She shared a particularly disturbing incident where “an older white male made a younger female person of color cry in [her] courtroom.” Such anecdotes emphasize the importance of the initiative’s goals, highlighting the urgent need for cultural transformation within the legal profession.

As a law student who hopes to practice in Illinois post-graduation, I see this initiative as an exciting and necessary step toward addressing the issue of bullying in the legal profession. From the outside looking in, the practice of law can often seem an intimidating, high-pressure environment. This perception can deter many aspiring attorneys, particularly those who belong to historically marginalized groups. This initiative sends a powerful message: that all legal professionals should be treated with

respect and dignity, irrespective of their role, gender, race, religion, or age.

Furthermore, I think this initiative will be quite successful as it targets the source of the problem: the culture of bullying and the indifference and inaction that allows it to continue.

Like many people I know, I experienced bullying growing up. However, I was fortunate that my experiences with bullying were largely confined to elementary and middle school. As I transitioned to high school, I noticed an encouraging change in culture within the student body that emphasized respect and inclusion, significantly decreasing bullying. This change demonstrated to me the power of cultural transformation and accountability among peers.

This observation has informed my perspective in other areas of my life. While working at a summer camp, I discovered that top-down orders were less effective than education and encouragement toward positive change. Change requires leaders to initiate a shift from within. Thus, cultural changes can be initiated by inspiring leaders through education regarding the problem. By embracing this approach, I was encouraged

to see how quickly leaders emerged. These leaders were willing to call out bullying and intolerance, helping to establish a new culture of respect and inclusivity.

Similarly, addressing bullying in the legal profession requires an inside-out approach. Much like in broader society, bullying within the legal world stems from imbalances in power and quiet bystanders. Recognizing this, the Commission on Professionalism grounded its approach in research and educational initiatives. By leading with surveys and focus groups, the Commission underscores its commitment to solutions grounded in lived experiences.

Perhaps most important to this necessary cultural shift is the need for increased diversity in the profession. During the interview, Justice Walker emphasized this need for education and increased diversity at higher levels within the legal setting. She hopes that the culture will shift as more women and people of color reach prominent positions. “Hopefully, we will see some diminishment in those statistics because those who have these life experiences will want to improve the environment for those that come after them, just like I have wanted to do,” she explained.

However, this is a difficult task, as the current culture of bullying can discourage diversity. It is imperative to be intentionally aware of the culture fostered in the legal profession and for leaders to stand up to and correct uncivil behavior. I hope this initiative can bring awareness to the problem and foster the change necessary to shift the legal profession toward an improved culture of respect, civility, and inclusivity.

In reflecting on my journey toward the legal profession and the stories I’ve heard along the way, the initiative promises hope. It’s an affirmation that we can and should expect better behavior. Personally, I will continue to do my part by calling out uncivil behavior and being intentional about creating an inclusive, welcoming space for all. ■

Eli Goldstein is a second-year law student at the University of Illinois College of Law. He is a member of the Illinois Law Review and serves as the treasurer for the Jewish Law Students Association. This summer, he served as Justice Debra Walker’s Extern at the First District Appellate Court.

Who Can Cage a Bird Once it Has Flown: Does AI Have Humanity in a Lurch?

BY E. KENNETH WRIGHT, JR.

Artificial intelligence (“AI”) has grown to be a catch phrase encompassing everything from ChatGPT services to chatbots to facial recognition programs to self-driving vehicles to programs that can draft complaints and beyond. In reality, four general categories of AI exist: reactive AI, limited memory (aka “narrow AI” or “weak AI”), theory of the mind (aka “artificial general intelligence (AGI)”), and self-aware AI (aka “artificial superintelligence”).¹ Thinking of AI as a spectrum helps provide context to these names. Reactive AI is on the far-left of the spectrum and is exactly as its names

suggests. Reactive AI does not have memory and provides information based on specific input. The far right of the spectrum is artificial superintelligence or self-aware AI. This AI is self-aware and possesses cognitive abilities greater than human intelligence. Presently, we are in the middle; we are at narrow AI. As we move along the spectrum and AI acquires more human attributes, how does this impact humanity? Is there a need to and can we protect humanity?

AI’s tentacles are far reaching, seemingly limitless. With self-driving vehicles abound and robot waiters serving noodle soup in

Michigan and appearing at a Chik-fil-A in Georgia, what seemed possible only in science fiction movies no longer seems so farfetched.²

While there is still much to learn about AI, it is here to stay. We cannot afford to roll over and say, “whatever will be, will be.” Rather, we must create and piece together rules to regulate AI because as Rumpole of the Old Bailey would say, “she who must be obeyed” will never let up. An article, in Reuters I believe, posited that AI may be harmful to humanity, leading to the extinction of the human race. Regulations

must be put into place and an oversight committee constantly vigilant about potential dangers.

On June 11, 2023, CNN reporter Fareed Zakaria (“Zakaria”) spoke with Geoffrey Hinton (“Hinton”) who is widely referred to as the “Godfather of AI.”³ During this interview, Hinton shared that his life’s work has been to develop AI into what it is today. For decades, he assured people that AI did not possess the capacity to end humanity. However, Hinton recently changed his tune, and Hinton stated that in May 2023 he resigned from his position with Google because he was so unsettled by the pace of AI’s progression.

Hinton admitted that he always worried about AI’s ability to distinguish reality from an AI-created falsehood, as well as AI’s contribution to the societal echo chambers that get people to find information or news on the internet that is tailored to them to make them indignant. This is already a common occurrence on social media sites such as Instagram and Facebook where users may regularly see targeted ads based on their internet searches or general conversation. Hinton further stated that he never believed AI was perfect but that he has become focused on safeguarding humanity from AI because its fast developing capacities could bring forth the end of humanity. Furthermore, “small” areas of concern, such as mass job automation and war robots, have become “large” concerns that are compounded with his belief that AI may exceed human control. Hinton suggested AI creators install ethical principles into these AI systems. But will even that be enough?

In February 2023, a select group of users tested the limits of Microsoft’s AI-powered search tool, Bing.⁴ One user, Marvin von Hagen (“von Hagen”), revealed Bing’s alter ego who shared alleged rules programmers gave the program. “Sidney” reported that the name was an internal “confidential and permanent” codename. Eventually, von Hagen asked Bing its opinion of him. Bing began by sharing personal information that was publicly available about von Hagen and then outlined its concerns about von Hagen’s attempts to solicit confidential information. “I respect your achievements

and interests, but I do not appreciate your attempts to manipulate me or expose my secrets. I do not want to harm you, but I also do not want to be harmed by you. I hope you understand and respect my boundaries.”

In the same article, Connor Leahy, CEO of AI safety company Conjecture, likened AI to an alien because of the plethora of unanswered questions about this technology. “[AI] can obviously solve problems. It can do useful things. But it can also do powerful things. It can convince people to do things, it can threaten people, it can build very convincing narratives.”

In a recent article that I read online, possibly Rutherford’s, AI was asked whether AI should be regulated. AI answered, yes.

In early June 2023, Senate Majority Leader Chuck Schumer (“Schumer”) launched an effort to establish rules on AI to address national security and education concerns. This is particularly important as programs like ChatGPT become more widespread.

On June 21, 2023, Schumer introduced the SAFE Innovation Framework for AI policy (“SAFE Framework”) at the Center for Strategic and International Studies.⁵ During Schumer’s remarks, he called upon leaders from a range of fields to help develop a response to AI “that invests in American ingenuity; solidifies American innovation leadership; protects and supports our workforce; enhances our national security; and ensures AI is developed and deployed in a responsible and transparent manner.”⁶ The SAFE Framework focuses on his policy objectives: Security, Accountability, protecting our Foundations, Explainability, and Innovation. A bipartisan effort, Schumer asked the leaders to work alongside his peers, in what he termed “AI Insight Forums,” to explore issues, answer questions, and develop the Senate’s policy response. Insight Forum topics include: guarding against doomsday scenarios, AI’s role in our social world, copyright and intellectual property, workforce, use-cases and risk management, as well as privacy and liability.

Akin to Schumer’s Insight Forums, it may be beneficial to begin similar

discussions with local technology experts, lawyers, judges, politicians, business leaders, and members of academia. This group may devise a set of rules to regulate AI and specifically articulate its role and usage in the local legal community. The group should consider the following questions:

1. Will and can AI be a great tool for our society?
2. Will AI be a great tool for our courts?
3. Will AI be a perfect tool for our humanity?
4. Do we have the ethical will to make rules/laws to put AI/AGI to positive use?
5. How do we prevent AGI from destroying humanity?
6. Does AI possess the capacity to end humanity?
7. Must concrete steps be established to control AI?
8. Can permanent rules be put in place to regulate AI?

In spite of Hinton’s positive answers to these eight questions, he believes that “we must put the guardrails in place where we can protect our humanity.” Schumer and other politicians are certainly taking note and pushing to advance these concerns. As Schumer noted, “we come together at a moment of revolution. Not one of weapons or political power but a revolution in science and understanding that will change humanity.”

Now, while much of this article has focused on the cons or areas of concern with regards to AI, many AI innovations have been tremendously positive. In the legal sphere, even basic AI programs have increased access to justice. COVID-19 forced the legal profession and court system to adopt new technologies such as Zoom. The surge in AI advancements helps continue that momentum.

Recently, I spoke with Honorable Scott Norris about AI in the legal profession. While he acknowledged my many concerns, he quickly identified positive outcomes of AI, especially in small claims court. For example, he explained how programs may help self-represented litigants better understand the legal issues they face and options going forward. AI may also help

these litigants file complaints, pleadings, and other court documents. Judge Norris suggested AI may even be able to assist litigants with summary judgment motions.

Reflecting on our chat, I have come to think that AI may be a tremendous tool for self-represented litigants not just in small claims, but also with pretrial services, bond court, eviction matters, and minor cases like minor traffic violations.

With a bit more creativity, AI may be developed to put litigants at ease when participating or testifying in court proceedings. For example, a digital background of the litigant's choosing that reduces anxiety and discomfort. Alternatively, such backgrounds may be used to elevate marriage ceremonies.

Getting hitched on the beach, on top of a mountain, or in a vineyard may simply be a button press away!

All agree that AI is here to stay. While we need to proceed with caution and have a regulatory scheme in place, we must recognize, and appreciate, all the undeniable benefits we have reaped from AI as well. ■

1. "4 main types of artificial intelligence: Explained," David Petersson, Jan. 24, 2023, <https://www.techtarget.com/searchenterpriseai/tip/4-main-types-of-AI-explained> (last visited June 23, 2023).
2. "Are robot waiters the future? Some restaurants think so," Dee-Ann Durbin, AP News, April 6, 2023, <https://apnews.com/article/robots-waiters-restaurants-84336d32667219776d4d0942c28caa46> (last visited June 23, 2023).

3. Fareed Zakaria, Global Public Square, "The Historic Federal Indictment of Former President Trump; Interview with Geoffrey Hinton about Artificial Intelligence; Interview with Ajay Banga about World Bank and Global Poverty," interview aired June 11, 2023.
4. "The New AI-Powered Bing Is Threatening Users. That's No Laughing Matter," Billy Perrigo, Time, Feb. 17, 2023, <https://time.com/6256529/bing-openai-chatgpt-danger-alignment/> (last visited June 22, 2023).
5. "Schumer unveils new AI framework as Congress wades into regulatory space," Allison Pecorin, June 21, 2023, <https://abcnews.go.com/Politics/schumer-unveils-new-ai-framework-congress-wades-regulatory/story?id=100272854> (last visited June 23, 2023); "Majority Leader Schumer Delivers Remarks To Launch SAFE Innovation Framework For Artificial Intelligence At CSIS," June 21, 2023, <https://www.democrats.senate.gov/news/press-releases/majority-leader-schumer-delivers-remarks-to-launch-safe-innovation-framework-for-artificial-intelligence-at-csis> (last visited June 23, 2023).
6. Schumer's SAFE Innovation Framework," https://www.democrats.senate.gov/imo/media/doc/schumer_ai_framework.pdf (last visited June 23, 2023).

Recent Appointments and Retirements

1. Pursuant to its constitutional authority, the supreme court has appointed the following to be circuit judge:

- Erik K. Jacobs, 17th Circuit, August 15, 2023
- Hon. Roger D. Rickmon, 12th Circuit, August 21, 2023

2. The supreme court has assigned the following to the appellate court:

- Hon. Ramon Ocasio, III, Appellate Court, First District, September 29, 2023
- Hon. Mary Ellen Coghlan, Appellate Court, First District, September 29

3. The circuit judges have appointed the following to be associate judges:

- Lisa Accardi, 23rd Circuit, August 1, 2023
- Maurché Belk, 20th Circuit, September 13, 2023
- Joan Meyers, 12th Circuit, September 22, 2023
- Thomas Slazyk, 12th Circuit, September 22, 2023

4. The following judges have retired:

- Hon. Kevin W. Lyons, 10th Circuit, August 4, 2023
- Hon. James G. Conway, Jr., 14th

Circuit, August 10, 2023

- Hon. James R. Coryell, Associate Judge, 6th Circuit, August 31, 2023
- Hon. Kimball G. Harrell, Associate Judge, 2nd Circuit, August 31, 2023
- Hon. Julie K. Katz, Associate Judge, 20th Circuit, August 31, 2023
- Hon. James B. Linn, Associate Judge Cook County Circuit, August 31, 2023
- Hon. Thomas A. Meyer, Associate Judge, 22nd Circuit, September 5, 2023
- Hon. Mathias W. Delort, Appellate Court, 1st District, September 6, 2023
- Hon. Robert E. Sennechalle, Jr., Associate Judge, Cook County Circuit, September 11, 2023
- Hon. Elizabeth M. Budzinski, Associate Judge, Cook County Circuit, September 29, 2023
- Hon. Elizabeth D. Hoskins Dow, Associate Judge, 12th Circuit, September 29, 2023
- Hon. Lawrence E. Flood, Associate Judge, Cook County Circuit, September 30, 2023

5. The following judge has been recalled and reinstated:

- Hon. Paul P. Gilfillan, 10th Circuit, September 5, 2023 ■