

Rural Practice

The newsletter of the Illinois State Bar Association's Section on Rural Practice

Chair's Column

BY SARAH J. TAYLOR

THIS MONTH, I WANT TO TAKE A moment to thank you for reading the Rural Practice Section Newsletter! Each month, the Rural Practice Section works to put together a newsletter that provides helpful information for rural practitioners on relevant laws and rules, events of interest, ISBA benefits and initiatives for rural practitioners, and features on law-related activities in rural communities in Illinois. Special thanks to our co-editors, Ean Albers, Sara Peska, and Cari Rincker for their hard work each month.

In September, we introduced a new feature called Spotlight on a Rural Courthouse, with an article by Patti Clark, the Director of Court Operations for the Jackson County Circuit Court about several innovations at the court and outreach activities to the public. We are hoping to make this a regular feature that

highlights innovations and interesting programming happening in courthouses in rural Illinois. If you or your circuit court's administrator would like to submit an article about your local courthouse, or if you have an article on another rural practice topic, please email staff liaison, Anita DeCarlo, adecarlo@isba.org.

Also, we are asking for your help in sharing the word about joining the Rural Practice Section, so please spread the word. More information about the Rural Practice Section and how to join is at: [Rural Practice | Illinois State Bar Association](#).

As always, please feel free to email me or staff liaison, Anita DeCarlo, adecarlo@isba.org, with any comments or suggestions for the Rural Practice Section.

Thanks!

Sarah J. Taylor

Chair, Rural Practice Section Council ■

Chair's Column
1

Rural Law Practice in the
News: October 2026
1

Careless Use of AI Kneecaps
Another Lawyer
4

Rural Law Practice in the News: October 2026

BY SAM ELLIS & CARI BRETT RINCKER

LSAC and partners announce national convening on rural legal deserts

On September 17, 2026, the American Bar Association Journal reported that the Law School Admission Council, the Association of American Law Schools, and the University of Nebraska College of Law are organizing a national convening to address rural legal deserts. The

partnership invited law schools, state and Tribal courts, bar associations, and community organizations to participate in a coordinated effort that includes webinars, a survey of law-school initiatives, and a November convening.¹

The announcement underscored the scale of the problem: approximately 41 percent of U.S. counties meet the ABA

Continued on next page

Rural Law Practice

CONTINUED FROM PAGE 1

definition of a legal desert, 54 counties have no resident lawyer, and another 182 have only one or two. For rural practitioners, the project is notable because it connects recruitment, legal education, courts, and community-based service delivery rather than treating attorney shortages as a single-program problem.

September webinar focuses on preparing tomorrow's rural lawyers

LSAC's September 16 webinar, *Preparing Tomorrow's Rural Lawyers: Student Success and Community Impact*, brought together legal-education leaders to discuss how law schools can prepare students for practice in communities with unmet legal needs. The program emphasized experiential education, mentoring, career support, and partnerships among law schools, courts, bar associations, Tribal courts, and local organizations.²

For rural firms and bar leaders, the discussion offers a practical reminder that recruitment is only one part of retention. New lawyers also need professional networks, early exposure to rural practice, structured training, and support after graduation if they are to build sustainable careers in smaller communities.

October webinar will examine service-delivery solutions

The final program in LSAC's 2026 rural-access webinar series, *Closing the Justice Gap: Expanding Legal Services in Rural Communities*, is scheduled for October 14 (*Editor's Note*: This program has already occurred at the time of publication). The panel will examine barriers to rural legal services and approaches to strengthening the rural legal workforce, modernizing service delivery, and expanding access through policy, regulatory, and community-based solutions.³

The scheduled speakers represent

courts, legal education, access-to-justice organizations, and community-justice initiatives. That range is especially relevant to rural practice because durable solutions often require coordination among private attorneys, legal aid providers, courts, law schools, and trusted local institutions.

Legal Services Corporation highlights promising rural practices

The Legal Services Corporation is highlighting *Justice Where We Live: Promising Practices from Rural Communities*, the final report of its Rural Justice Task Force. The report identifies persistent barriers, including attorney shortages, unreliable broadband, long travel distances, limited transportation, and the importance of community trust.⁴

The report also collects practical approaches already being used across the country, including rural-attorney recruitment programs, mobile legal clinics, community justice workers, partnerships with medical and faith-based organizations, and expanded use of technology. Rural practitioners can use these examples when developing local partnerships or supporting funding proposals tailored to community needs.

NCSC continues to expand rural-justice and legal-desert resources

The National Center for State Courts continued to feature its rural-justice and legal-desert resource hub in September and October. The collection includes lessons from the Rural Justice Collaborative, geographic-information-system mapping tools, and resources addressing legal education, admissions reform, and rural court innovation.⁵

The mapping work is particularly useful because it combines attorney availability with distance to courthouses, poverty, limited English proficiency, and broadband access. This gives courts and local bar

Rural Practice

Published at least four times per year. Annual subscription rates for ISBA members: \$35.

To subscribe, visit www.isba.org or call 217-525-1760.

OFFICE

ILLINOIS BAR CENTER
424 S. SECOND STREET
SPRINGFIELD, IL 62701
PHONES: 217-525-1760 OR 800-252-8908
WWW.ISBA.ORG

EDITORS

Ean Albers, Hannah Brenner Johnson, Sara Ellen Stephenson Peska, Cari Brett Rincker

COMMUNICATIONS MANAGER

Celeste Niemann
✉ cniemann@isba.org

ART DIRECTOR

Ticara Turley
✉ tturley@isba.org

PUBLICATIONS ATTORNEY

Kelsey Burge
✉ kburge@isba.org

RURAL PRACTICE SECTION COUNCIL

Sarah J. Taylor, Chair/Board Liaison
Staci L. Vazquez, Vice-Chair
Kaylan V. Huber, Secretary
Angelica W. Wawrzynek, Ex-Officio
Ean Albers, Newsletter Co-Editor
Greg C. Anderson
Dulce M. Bernard
Kelly Collinsworth, CLE Coordinator
Billie J. Constant
Nathaniel Bruce Davidson
John F. Erbes
Alexis P. Ferracuti
David M. Foreman
Clarissa P. Gaff
Ebony R. Huddleston
Hannah Brenner Johnson, Newsletter Co-Editor
Hon. Lloyd A. Karmeier
Jennifer L. Kincaid
Andrea Lynn McNeill
James R. Myers
Dennis J. Orsey
Casey Lea Parker
Sara Ellen Stephenson Peska, Newsletter Co-Editor
Elizabeth M. Reynolds, CLE Coordinator
Cari Brett Rincker, Newsletter Co-Editor
Joseph A. Soulligne
Garrett Wilks Thalgott
Marisa P. Wiesman
Scott Dutton, Liaison for ISBA Mutual Insurance Company
Stacey M. Jonas, Liaison to IBF
Stacey Hacker Meehan, Liaison to IBF
Jessica M. Visage, CLE Committee Liaison
Ted M. Niemann, Board Liaison
Krista L. Appenzeller, Staff Liaison
Anita M. DeCarlo, Staff Liaison

DISCLAIMER: This newsletter is for subscribers' personal use only; redistribution is prohibited. Copyright Illinois State Bar Association. Statements or expressions of opinion appearing herein are those of the authors and not necessarily those of the Association or Editors, and likewise the publication of any advertisement is not to be construed as an endorsement of the product or service offered unless it is specifically stated in the ad that there is such approval or endorsement.

Articles are prepared as an educational service to members of ISBA. They should not be relied upon as a substitute for individual legal research.

The articles in this newsletter are not intended to be used and may not be relied on for penalty avoidance.

AI Policy: If authors have used artificial intelligence (AI) in the preparation of their articles, they have acknowledged that they accept responsibility for all final work product and have verified the accuracy of all content, including content produced with the assistance of AI.

groups a more complete basis for identifying service gaps and directing resources than attorney counts alone.

Succession planning takes on added importance in rural practice

On September 29, 2026, the American Bar Association published guidance emphasizing that every attorney should develop a succession plan to protect clients and maintain continuity during retirement, incapacity, or other unforeseen events.⁶ The issue has particular urgency in rural communities, where the departure of a single lawyer may leave clients with few nearby alternatives.

For small and solo rural practices, a workable plan should address client notice, file custody, trust-account responsibilities, deadline management, and arrangements with another attorney who can step in when needed. Succession planning is therefore not

only a law-practice management issue, but also an access-to-justice measure for the surrounding community. ■

1. Julianne Hill, *LSAC Will Lead National Convening on Solving Rural Legal Deserts*, ABA Journal (Sept. 17, 2026), <https://www.abajournal.com/web/article/lsac-leads-national-convening-on-solving-rural-legal-deserts>.
2. Law Sch. Admission Council, *Preparing Tomorrow's Rural Lawyers: Student Success and Community Impact* (Sept. 16, 2026), <https://www.lsc.org/document-library/1092>.
3. Law Sch. Admission Council, *Closing the Justice Gap: Expanding Legal Services in Rural Communities* (scheduled Oct. 14, 2026), <https://www.lsc.org/access-and-community-law-school/rural-access-justice/closing-justice-gap-expanding-legal-services-rural-communities>.
4. Legal Servs. Corp., *Justice Where We Live: Promising Practices from Rural Communities* (last visited Oct. 5, 2026), <https://www.lsc.gov/ruralreport>.
5. Nat'l Ctr. for State Cts., *Rural Justice & Legal Deserts* (last visited Oct. 5, 2026), <https://www.ncsc.org/resources-courts/access-fairness/rural-justice-legal-deserts>.
6. Am. Bar Ass'n, *What's Next? Succession Planning in Legal Practice* (Sept. 29, 2026), https://www.americanbar.org/groups/tort_trial_insurance_practice/resources/brief/2026-summer/whats-next-succession-planning-legal-practice/.



Careless Use of AI Kneecaps Another Lawyer

BY MICHAEL R. LIED

IT SEEMS THAT ALMOST EVERY

week we read a report of a lawyer or law firm hit with claims (and often resulting sanctions) related to hallucinated AI citations in court filings. The courts are getting *really* tired of the problem, as is evidenced by the recent case of *Scott v. Illinois Human Rights Comm'n*, 2026 IL App (1st) 251462.

What follows are excerpts from the appellate opinion. To try to accomplish easy readability, I have usually omitted citations (but there are many very useful citations for counsel having to deal with AI hallucinations in their opponents' filings). I have also slightly modified some words and have left out or changed some punctuation. Reading the entire opinion is a valuable exercise, and may someday save you serious money, professional embarrassment and, maybe, your license.

Additionally, employment lawyers will want to read the appellate court's discussion of procedure under the Illinois Human Rights Act and the Illinois Administrative Code. That is not the focus of this article though, so, again, read the actual opinion.

Brief background

Kimberly Scott, by her attorney Mason Cole, appealed an Illinois Human Rights Commission order. The Illinois Department of Human Rights had dismissed Scott's charge of workplace racial discrimination against her employer, Starbucks Coffee Company. The Commission found that the Department lacked jurisdiction over Scott's charge because she did not submit the Equal Employment Opportunity Commission (EEOC) determination to the Department within 30 days of receiving it, as is required under the Illinois Human Rights Act. The Commission also concluded that the claim

failed for lack of substantial evidence of racial discrimination.

Problems with court filings

Before reaching the merits of the appeal, the appellate court spent a number of pages dealing with Cole's filings.

The respondents in the case were the Department, the Commission, and Starbucks. Initially, respondents requested that the court strike Scott's brief and dismiss the appeal due to her noncompliance with Illinois Supreme Court Rule 341(h). Specifically, the respondents submitted that Scott's opening brief (1) misquoted both the Act and the Code and (2) contained a statement of facts that was argumentative and did not properly cite the record. The appellate court declined to strike Scott's brief and dismiss the appeal pursuant to Rule 341(h), but did impose sanctions against Cole for reasons that follow.

False statutory quotations

Rule 341(h)(5) requires that, in a case involving the construction or validity of a statute, the appellant must include the pertinent parts of the provision verbatim, with a citation of the place where it may be found, all under an appropriate heading. Scott's briefs failed to address the relevant provisions of the Act or the Code.

Oops.

Instead, Scott misquoted inapplicable statutes and fabricated statutory language. Similarly, Scott falsely quoted a section of the Code.

Respondents identified the two false quotations, but the court caught another one.

A second oops.

Finally, page 12 of Scott's opening brief quoted section 1-102(A) of the Act as requiring "vigorous enforcement" of antidiscrimination protections. The appellate court tersely said, "Section 1-102(A) contains no such language."

But wait, there's more.

False case citations

Scott's briefs also contained false case citations. As seems to happen with some regularity when AI helps write a legal filing, one case cited by Scott did not exist at all.

In addition, Scott quoted language that did not actually appear in the cases cited.

That would be bad enough, but Scott also cited cases that did not support the propositions of law for which Scott cited them. It's not a good sign when the court's opinion says "Scott cites *Whipple v. Department of Rehabilitation Services**** for the proposition that *** but *Whipple* says no such thing."

You can almost start to feel the court's frustration mounting.

Improper statement of facts

Rule 341(h)(6) requires the appellant to include a statement of the facts necessary to an understanding of the case, stated accurately and fairly without argument or comment, and with appropriate reference to the pages of the record on appeal.

Scott's statement of facts was improper because it cited her brief's appendix, not the record on appeal.

Sanctions

The appellate court's analysis of the sanctions issues is worth careful reading.

Respondents requested that the court strike Scott's brief and dismiss the appeal based on the violations of Rule 341(h) mentioned above. The court recognized it had the authority to do so but generally exercises that authority only when the brief's deficiencies hinder its review. That was not the case here. The court could rely on its own review of the record, the Act, and the Code to resolve the appeal.

Scott's citations of fictitious legal authority did not automatically justify striking a brief and dismissing an appeal.

The court denied respondents' request to strike Scott's brief and dismiss the appeal. However, the court still had to address Scott's attorney's pattern of presenting multiple fabricated quotes of statutory language and case citations.

Illinois appellate court decisions generally address fabricated quotations and citations under Illinois Supreme Court Rule 375. Sanctions may include barring a party from presenting a claim or defense, entering judgment against the party, dismissing the appeal, striking briefs, and monetary fines. Rule 375(b) allows the court to sanction a party or an attorney for filing a frivolous appeal, including an appeal not warranted by existing law or a good-faith argument for the extension, modification, or reversal of existing law. Courts have interpreted this to include relying on nonexistent legal authority. See, e.g., *Baby Boy*, 2025 IL App (4th) 241427, ¶¶ 117-19. Sanctions may include paying the opposing party's damages, attorney fees, and costs.

If the court initiates Rule 375(b) sanctions proceedings, it must require the offending party or attorney to show cause why sanctions should not be imposed before imposing the sanction.

To comply with Rule 375(a)'s notice-and-hearing requirement and Rule 375(b)'s show cause procedure, courts have ordered parties and attorneys to (1) file written responses explaining the AI-hallucinated citations in their briefs, (2) appear at hearings to explain the hallucinated citations, or (3) do both.

Cole's response

The appeals court ordered Cole to file a response explaining the false quotations and citations in his briefs by July 14, 2026. While he apparently had enough time to do a very thorough job, Cole filed his response 12 days early. Keep reading.

Cole's response conceded that all the quotations and citations mentioned above were false. Cole stated that he "frequently use[s] a premier corporate subscription of

ChatGPT" to "synthesize complex matters," including Scott's case. Cole claimed that he "cross-referenced" every citation in his briefs "with LexisNexis to avoid hallucinations." However, he "overlooked" that several of those citations either did not exist, or did not stand for the propositions of law for which he cited them. Cole stated that his "inability to properly verify the cites is a result of [his] inexperience in appellate court." He proposed a fine of \$1,000 for the "citation" of one nonexistent case and \$500 for each of the misquoted and mis-stated propositions of law.

The court now seems to have passed frustration and is approaching aggravation:

"Frustratingly," Cole's response itself contained misstatements of law. The court pointed out that in just one citation, Cole cited a statutory subsection that no longer exists, attributed a quote to the wrong subsection, and then misquoted that subsection. The appeals court also took issue with the form and substance of some footnotes in the response, as well as Cole's

MEMBER APPRECIATION RECEPTION HONORING THE 2026 CLASS OF DISTINGUISHED COUNSELORS

November 12, 2026 | The Westin Chicago Lombard | Lombard, IL

Join us in honoring the 2026 class of Distinguished Counselors at our Fall Member Appreciation Reception! Connect with your ISBA friends and colleagues and enjoy an evening of networking at The Westin Chicago Lombard. The reception will feature hors d'oeuvres, beer, and wine. We hope to see you there!

[ISBA.ORG/EVENTS/FALL-MEMBER-RECEPTION](https://isba.org/events/fall-member-reception)

failure to follow its direction to provide “pin cites” to certain cases.

*Even more aggravation. Yet **another** oops:*

“In his response, attorney Cole says that he ‘want[s] to completely avoid legalese and speak directly to this Court.’ We will speak directly to him: this is unacceptable. Attorney Cole’s response should have included scrupulously accurate and precise citations. Instead, it is yet another sloppy filing that misstates the law and creates more work for this court. We do not know why attorney Cole feels compelled to rush out obviously flawed filings, but this must stop. This type of lawyering is harming attorney Cole’s clients, his own professional reputation, and this court’s workflow.”

Yikes.

Basis for sanctions

Sanctions were warranted. Cole violated Rule 341(h)(5) because his opening brief did not contain accurate quotations of the statutes involved in the appeal. The appeals court found that Cole’s misconduct was willful. Respondents identified Cole’s multiple misquotations of statutory law, yet Cole did not acknowledge those misstatements in his reply or seek leave to amend his opening brief. On the contrary, his reply brief repeated a false statutory quotation and dismissed misstatements of law as “technical deficiencies.” Cole’s reply brief showed that he intentionally persisted in his attempts to mislead the court. Because Cole willfully violated Rule 341(h)(5), he violated Rule 375(a), warranting sanctions.

Cole also violated Rule 375(b) because the arguments he raised on appeal were frivolous. Arguments based on AI-hallucinated citations are frivolous because citation to a fake opinion does not provide a non-frivolous ground for extending, modifying, or reversing existing law, or for establishing new law.

In this case, the Commission found that the Department lacked jurisdiction to investigate Scott’s charge of workplace racial discrimination because Scott did not submit the EEOC’s findings to the Department within 30 days of

receiving them, which the Act and the Code required her to do. Cole’s primary argument was that the Department violated its statutory duty to conduct a “full investigation,” but the supposed “full investigation” requirement was a product of AI-hallucinated language. Therefore, Cole’s chief argument was based on fake statutory language and was frivolous.

Furthermore, submitting AI-hallucinated quotations and citations misrepresented the law to the court and violated the Illinois Rules of Professional Conduct under several rules.

AI-hallucinated citations also violated the Illinois Supreme Court’s policy on AI usage, which provides that attorneys are accountable for their final work product and must thoroughly review AI-generated content before submitting it in *any court* proceeding to ensure accuracy and compliance with legal and ethical obligations (emphasis added by me).

The court imposed sanctions based not only on principle but also because Cole’s misconduct forced respondents and the court to expend significant additional time and resources on the appeal. “This court has had to (1) painstakingly distinguish fact from fiction in every citation in Cole’s briefs, (2) research nationwide case law on sanctions for submitting false citations, (3) order Cole to file a response explaining his fabricated statutory citations and review that response, and (4) address this issue in this opinion. Cole’s misconduct has delayed the resolution of this appeal, harming both his own client and respondents.”

Having an appeals court tell your client in a written opinion that your misconduct harmed her cannot be good for the lawyer’s state of mind or digestion.

The court rejected any suggestion that AI hallucinations are just “technical deficiencies” or a fact of modern practice we must accept. The only acceptable standard is zero false citations.

Amount of sanctions

The appeals court considered the appropriate sanctions after a thorough review of other state and federal cases.

Attorneys seeking—or seeking to avoid—sanctions would be well advised to read this part of the opinion with special care.

Some federal courts have required attorneys who submitted AI-hallucinated citations to provide the orders sanctioning them to the judges in every pending case in which the attorneys had appearances. At least one court ordered an attorney to undergo continuing legal education on AI hallucinations. That same court also barred *pro hac vice* attorneys from practicing before the court for two years as a sanction for submitting six AI-hallucinated cases.

Here, the court of appeals ordered Cole to pay a \$15,000 fine to the clerk of the appellate court. Cole’s briefs contained a total of 10 false citations: 4 false statutory quotations, 1 nonexistent case, and 5 cases that exist but did not contain the cited principle or quoted language. The sanction reflected a \$1,500 fine for each false citation and quotation.

The court recognized that this rate was somewhat higher than what courts have imposed in the past. Here, the court set a rate of \$1,500 per misstatement of law for two reasons. First, there is no meaningful difference between the various types of false citations and quotations. A fabricated quote, a nonexistent case, and a case that does not say what counsel claims it says are all misstatements of law. They all require opposing counsel and the court to expend unnecessary time and effort addressing those misstatements of law.

The fact that AI hallucinated the citations does not mitigate their falsehood. AI-hallucinated citations are no different than false citations an attorney could create from his own imagination. Therefore, the sanctions rate for all types of false citations and quotations should be the same, as the attorney, not AI, retains ultimate responsibility for what he or she submits to the court.

Cole’s response stated that he uses a “premier corporate subscription of ChatGPT” (which is presumably a paid subscription) to draft filings. In the court’s view, the case illustrated that, no matter how much one pays for “premier” or “corporate” versions of AI products, the

attorney still retains the obligation to verify all citations of authority.

Second, AI-hallucinated citations are an increasingly persistent problem in courts nationwide. This indicates that the fines courts are imposing are not enough to deter improper AI use among attorneys. In fact, the prospect of sanctions in this case did not deter Cole from submitting outdated statutory citations and disobeying the court's order to include pin cites in his response. Courts have no choice but to increase fines for AI-hallucinated citations until those fines have a significant deterrent effect.

Uh oh.

ARDC referral

In addition, the clerk of the appellate court was directed to send a copy of the opinion to the Illinois Attorney Registration and Disciplinary Commission. "Attorney Cole repeatedly misrepresented the law to this court even after his opponent identified his misstatements to this court and even after being warned that the court was considering sanctions." Moreover, in his response, Cole claimed that his "inability to properly verify the cites is a result of [his] inexperience in appellate court." As the court of appeals observed, attorneys verify citations the same way in every court, so this claim raised questions about Cole's fitness to practice law generally.

Nonmonetary sanctions

The appeals court considered imposing additional nonmonetary sanctions on Cole, such as ordering him to serve a copy of the opinion upon every judge who presides over a pending matter in which Cole has an appearance.

"We would impose this sanction not to embarrass attorney Cole but to protect our fellow courts, the orderly administration of justice, and attorney Cole's clients and opponents. Our overloaded court system must be able to trust that attorneys' submissions are accurate rather than fabricated. Other courts in which attorney Cole practices should not be at risk of accidentally deciding cases based on AI-hallucinated citations, nor should attorney

Cole's clients or opponents be prejudiced by such submissions."

The court also considered ordering Cole to attend continuing legal education (CLE) on appropriate AI usage and proper citation of legal authority for two reasons. First, there was no dispute Cole was using ChatGPT to draft briefs without verifying the citations and quotations it generated. He needs to learn how to use AI properly if he plans to use it in the future. More broadly, the court believed that attorney Cole either does not have or does not employ fundamental cite-checking skills.

However, it did not appear to the court that Rule 375 authorized such sanctions. In the interest of not exceeding its authority under Rule 375, the court determined not to impose the additional nonmonetary sanctions discussed above, "as much as we would like to do so."

Ouch.

The appeals court strongly encouraged Cole to review every filing he has submitted in pending cases, to seek to withdraw filings if they contain AI hallucinations, and to attend CLEs on proper AI usage and citation of authority.

Takeaways

Gosh. Where do we start?

AI is a fairly new tool. It is evolving hourly, and already seems to be almost developing a mind of its own—for better or worse. Maybe approach it cautiously, like a power tool—for example, a chainsaw. If used properly it can accomplish its purpose very effectively. If used carelessly it can hurt you, possibly badly.

Take CLE classes about AI.

Never trust AI statutory or case citations. Do the necessary reading and research. Some clients will think you should charge less since AI can make your job easier. What is your license and reputation worth?

Be especially careful in citing statutes or code provisions, since your searches might turn up outdated versions.

For older lawyers (I'm one), think about involving younger lawyers who may be more attuned to AI technology and developments. Even so, monitor their work

carefully. Your (or your firm's) name is still on the pleading.

Read and follow the relevant court rules and rules of professional responsibility. (Should I even need to say this?) Some judges, usually in federal court, may even have additional requirements.

Assume that even lower courts, like circuit courts, will start paying attention to AI hallucination issues in legal filings and will consider sanctions.

Don't imagine that saying you bought a fancy version of an AI agent or other software will save your bacon if there is a problem with your court filings.

Appeals are often much different than proceedings in the trial court. There are special rules, and you will get expert scrutiny. If you don't often do appeals, consult (or partner with) someone who does.

If your opponent or the court suggests you have used AI hallucinations, take this seriously. Immediately check and make the necessary corrections and apologies. Do not "double down" or ignore such warnings.

If, heaven forbid, you are at the "show cause" juncture, "fess up" if you need to. Be especially careful and thorough in your response. Same advice if you find yourself before any attorney disciplinary authorities.

Conclusion

The appeals court's thorough opinion was a wonderful springboard for an extended article discussing the uses, pitfalls, and possible misuses of AI. This is an extremely fast-moving technology that can help or harm the lawyers that use it. I don't know Mr. Cole and have not intended to disparage him in this article. We lawyers, unlike a few doctors, typically recognize we are only human and will sometimes make mistakes. Try to minimize your mistakes, and when you commit one, don't ignore it or try to cover it up. Fix it if you can and in any event, learn from it. ■

This article was originally published in Labor & Employment Law (September 2026, Vol. 64, No. 1), the newsletter of ISBA's Section on Labor & Employment Law.



MEET THE *Fellows*

2026-2027 ASSOCIATE FELLOWS



DYLAN HAKEY

Grundy County
Meents Law, P.C.
University of Illinois Chicago Law School



JENNA HAYES

Shelby County
Dove & Dove Attorneys
Southern Illinois University
Simmons Law School



REAGAN HONN

Morgan County
Rammelkamp Bradney, P.C.
Southern Illinois University
Simmons Law School



TARYN TAYLOR

Vermilion County
Huber & Mudd, LLC
University of Illinois College of Law



LAUREN RUSHTON

Jefferson County
The Law Office of Rebecca L. Reinhardt, LLC
Southern Illinois University
Simmons Law School



ISBA Group
HEALTH INSURANCE



We Need **YOUR** Help!

After a successful response to our initial member survey, the ISBA is moving on to the next phase of our project to explore the development of a group health insurance offering for members' law firms. While the project is progressing, we remain in the early stages with much work yet to be done, and we need your help.

Specifically, we need as many members as possible to fill out our ISBA Group Health Insurance Quote Form and securely submit it to KeyRisk Underwriters (the firm the ISBA has contracted with to assist with this project). The form collects basic information about your firm's employees and their dependents that are covered by the firm's current health insurance offering. Once we have collected as many forms as possible, KeyRisk Underwriters and the ISBA will use the aggregate data to begin discussions with health insurance carriers about coverage plans for ISBA members' firms.

How to **Help** in This Effort:

- Scan the QR code below or visit isba.org/group-health-ins to view our ISBA Group Health Insurance webpage.
- Download our ISBA Group Health Insurance Quote Form.
- Deliver the digital form to the staff member at your firm who is responsible for health insurance and/or human resources.
- Once the form is complete, upload it to KeyRisk Underwriters' secure document portal by using the link provided on the webpage and the form. **Do not send this form to the ISBA!**

isba.org/group-health-ins



ILLINOIS STATE BAR ASSOCIATION

SOLO & SMALL FIRM

CONFERENCE 2026

September 17 & 18 | Peoria Marriott Pere Marquette
501 Main Street, Peoria





