

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

REAVES LAW FIRM, PLLC,)	
Plaintiff,)	
v.)	
BAKER, DONELSON, BEARMAN,)	
CALDWELL & BERKOWITZ, PC;)	No. 2:25-cv-2623-SHL-atc
JONATHAN HANCOCK; MARY)	
KATHERINE CAMPION; JERRICK)	
MURRELL; DEAN J. SHAUGER; and)	
JOHN DOES 1-3,)	
Defendants.)	

**ORDER ISSUING RULE 11 SANCTIONS TO PLAINTIFF FOR THE MISUSE OF
ARTIFICIAL INTELLIGENCE IN COURT FILINGS**

This case presents a study in the perils that can result from the unchecked use of artificial intelligence in the drafting of legal filings.

On June 18, 2025, Plaintiff Reaves Law Firm, PLLC (“RLF”), filed its complaint against the law firm Baker, Donelson, Bearman, Caldwell & Berkowitz, PC (“Baker Donelson”) and Jonathan Hancock, Mary Katherine Campion, Jerrick Murrell, and Dean J. Shauger, who are attorneys at the firm. (ECF No. 1.) The allegations in the complaint focus on Baker Donelson’s representation of RLF in another case from this district that resulted in a judgment against RLF in the amount of \$3,631,095.92. (See Mosby v. Reaves Law Firm, PLLC, Case No. 2:23-cv-02099 (W.D. Tenn.), ECF Nos. 77, 78). RLF alleges several causes of action against Defendants, including legal malpractice. Defendants filed their answer, which includes a counterclaim by Baker Donelson for legal fees that it alleges remain unpaid by RLF from the Mosby case and other matters. (ECF No. 9.)

RLF filed a Partial Motion to Dismiss Baker Donelson's counterclaim. (ECF No. 15.) Defendants filed a Motion for Judgment on the Pleadings. (ECF No. 16.) Amid the briefing of those motions, Defendants raised concerns that RLF was using generative artificial intelligence ("GAI") in the drafting of its filings, identifying a host of issues tied to the alleged GAI use.

Specifically, Defendants' response to RLF's Partial Motion to Dismiss asserts that Plaintiff relies on cases that do not stand for the propositions for which they are cited, and, even worse, RLF includes quotations from those cases that do not exist. (See ECF No. 19.) Two days after Defendants initially raised the GAI issues, RLF filed a response to the Motion for Judgment on the Pleadings. (ECF No. 20.) Then, three days after that, RLF filed a supplemental response. (ECF No. 23.)

But, according to Defendants, those two filings contain more of the same issues that surfaced in RLF's Partial Motion to Dismiss, and Plaintiff "remain(ed) steadfast in its misuse and abuse of GAI" even after being put on notice of the GAI issues. (ECF No. 24 at PageID 316.) For instance, the Response to the Motion for Judgment on the Pleadings cites to numbered paragraphs from RLF's complaint that do not exist and to facts that the complaint does not allege. (See ECF No. 20 at PageID 277 (citing to ¶¶ 69–70 of the complaint, which only contains forty-seven numbered paragraphs).) The response and its supplement also include citations to cases that do not exist, misrepresent the holdings from cases that do exist, and include quotations that were spun out of whole cloth. (See, e.g., ECF No. 20 at PageID 277–79; ECF No. 23 at PageID 297–99.) Ultimately, Defendants argue that "Plaintiff's continued misuse of GAI with false citations, quotes, and holdings warrants independently the sanction of dismissal." (ECF No. 24 at PageID 317.)

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