

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF CONNECTICUT

Raul Gonzales Davila v. Roblen, LLC f/d/b/a Vicolo Pizza Restaurant
and Viktor Berisha

No. 3:23-cv-00512 (SRU) (D. Conn. Feb. 6, 2026) · No. 3:23-cv-00512 (SRU) · Decided February 6, 2026

SUMMARY

The United States District Court for the District of Connecticut considered sanctions arising from plaintiff's counsel's submission of a brief containing fabricated AI-generated quotations from legal authorities. The court ordered David Stich to complete at least three hours of continuing legal education on responsible AI use and share his knowledge with the Connecticut legal community. The court declined to impose sanctions on co-counsel Stephanie Stich.

CASE DETAILS

COURT	United States District Court for the District of Connecticut
WRITING FOR THE COURT	Stefan R. Underhill
JURISDICTION	United States District Court for the District of Connecticut
DECIDED	February 6, 2026
DOCKET	3:23-cv-00512 (SRU)
DISPOSITION	other
PROCEDURAL POSTURE	The court considered whether to impose sanctions on plaintiff's attorneys for filing a brief containing fabricated AI-generated quotations and for a co-counsel's lack of candor when seeking to file a corrected brief.
STANDARD OF REVIEW	The court exercised its inherent authority to sanction attorney conduct and applied the standards governing sanctions for negligent or reckless failure to perform an attorney's responsibilities as an officer of the court, as well as the Connecticut Rules of Professional Conduct governing candor to the tribunal.
PRECEDENTIAL VALUE	Unknown

TOPICS

- sanctions
- civil procedure
- wage and hour
- flsa
- summary judgment

PRACTICE AREAS

civil procedure

employment law

legal ethics

sanctions

QUESTIONS PRESENTED

1. Whether David Stich's filing of a brief containing fabricated AI-generated quotations, without reviewing the cited authorities, warranted sanctions under the court's inherent authority.
2. Whether the court was required to find bad faith before sanctioning David Stich's negligent or reckless failure to perform his responsibilities as an officer of the court.
3. Whether Stephanie Stich's failure to disclose the reason for seeking to file a corrected brief violated the duty of candor to the tribunal or otherwise warranted sanctions.

HOLDINGS

1. David Stich's failure to review AI-generated quotations and citations before filing a brief, resulting in arguments based on fabricated law, constituted a negligent failure to perform his responsibilities as an officer of the court and warranted sanctions under the court's inherent authority.
2. Bad faith was not required because David Stich's conduct involved a negligent failure to perform his responsibilities as an officer of the court and was not integrally related to legitimate zealous advocacy.
3. Stephanie Stich was not sanctioned because, although she was not entirely candid about the reason for seeking to file a corrected brief, she did not lie, deceive the court, or make a false statement of fact or law under Connecticut Rule of Professional Conduct 3.3.

KEY QUOTATIONS

"This Court has the "inherent power to 'manage [its] own affairs so as to achieve the orderly and expeditious disposition of cases.'"" (Section III.a)

"Absent a finding of bad faith, attorneys can only be sanctioned for conduct that involves "a lawyer's negligent or reckless failure to perform his or her responsibility as an officer of the court.'" (Section III.a)

"Most importantly, David Stich never "conduct[ed] a reasonable inquiry into the viability of" the brief." (Section IV.a)

"Although Stephanie Stich may not have been entirely candid with this Court, her conduct does not merit sanctions. She did not lie or deceive this Court." (Section IV.b)

FACTUAL BACKGROUND

David Stich filed a memorandum opposing summary judgment that contained multiple fabricated AI-generated quotations from legal authorities, including a quotation attributed to *Pineda v. Frisolino, Inc.* that did not appear in that decision. He admitted that he failed to check the AI-generated quotes and citations before filing and committed to additional education concerning responsible AI use. Stephanie Stich contacted chambers about filing a corrected brief but did not disclose that the filed version contained hallucinated quotations; she later

apologized and described her remedial education. The underlying action concerns alleged state and federal minimum-wage and overtime violations brought by an immigrant plaintiff with limited English proficiency.

PROCEDURAL HISTORY

Plaintiff's counsel David Stich filed an opposition to defendants' motion for summary judgment containing AI-generated quotations that did not appear in the cited authorities. Stephanie Stich later contacted chambers about filing a corrected brief without disclosing that the correction was prompted by the fabricated quotations. The court ordered both attorneys to show cause why they should not be sanctioned. After considering their responses, the court sanctioned David Stich with mandatory continuing legal education and a written educational contribution to the Connecticut legal community, but declined to sanction Stephanie Stich.

DISPOSITION

other

CASES CITED

- United States v. Seltzer, 227 F.3d 36, 40-41 (2d Cir. 2000)
- Chambers v. NASCO, Inc., 501 U.S. 32, 50 (1991)
- Palmer v. Simon's Agency, Inc., 833 F. App'x 838, 839 (2d Cir. 2020)
- Cojom v. Roblen, LLC, Dkt. No. 3:23-CV-01669 (JCH), Doc. No. 49
- Cojom v. Roblen, LLC, 2025 LX 524310 (D. Conn. Nov. 17, 2025)
- AJ Energy LLC v. Woori Bank, 829 F. App'x 533, 535 (2d Cir. 2020) (summary order)
- Pineda v. Frisolino, Inc., 2017 WL 3835882 (S.D.N.Y. Aug. 29, 2017)
- Phillips v. Berlex Labs., Inc., 2006 U.S. Dist.

OPINION

Davila

PER CURIAM.

UNITED STATES DISTRICT COURT

DISTRICT OF CONNECTICUT

RAUL GONZALES DAVILA,

Plaintiff, No. 3:23-cv-00512 (SRU) v. ROBLEN, LLC f/d/b/a VICOLO PIZZA
RESTAURANT and VIKTOR BERISHA,

Defendants.

SANCTIONS ORDER

I. Introduction In the instant action, David Stich, counsel for plaintiff Raul Gonzales Davila, filed a brief containing AI-generated quotes from legal authorities that did not contain those quotes. See, e.g., Doc. No. 71 at 18-19 (citing fake AI-generated quotes).¹ Before the brief's hallucinated AI-generated quotes came to light, Stephanie Stich, David Stich's co-counsel and daughter,

contacted my chambers and asked about filing a “corrected version” of the brief. See Doc. No. 84 at 1-2. Stephanie Stich never acknowledged that they sought to file a “corrected version” because the filed version contained hallucinated AI-generated quotes. In deciding whether David Stich and Stephanie Stich deserve sanctions, I balance two competing facts. On one hand, their conduct did not meet the professional standards required of all attorneys. On the other hand, both David Stich and Stephanie Stich recognize the seriousness 1 Those fake AI-generated quotes are known as “hallucinations,” which are “false facts generated by GenAI systems.” Zach Warren, GenAI hallucinations are still pervasive in legal filings, but better lawyering is the cure, *Thomas Reuters* (Aug. 18, 2025), <https://www.thomsonreuters.com/en-us/posts/technology/genai-hallucinations/>. of their mistakes and have committed to taking affirmative steps to avoid any future AI-related legal errors. I must decide whether David Stich and Stephanie Stich’s conduct deserves sanctions.

II. Factual Background David Stich and Stephanie Stich represent the plaintiff, an immigrant with limited English language proficiency, in his suit against his former employer for violations of state and federal minimum wage and overtime laws. See Complaint, Doc. No. 1, 1-2, 6, 12. David Stich has previously come before this Court to address concerns about his use of AI in legal filings. In a parallel case to the instant action, Judge Janet C. Hall ordered David Stich to show cause for why he should not be sanctioned for submitting a memorandum of law containing hallucinated AI-generated citations to non-existent cases. See *Cojom v. Roblen, LLC*, Dkt. No. 3:23-CV-01669 (JCH), Doc. No. 49. Judge Hall determined that the most appropriate sanction for David Stich was \$500. See *Cojom v. Roblen, LLC*, 2025 LX 524310, at *10 (D. Conn. Nov. 17, 2025).

III. Legal Standard a. David Stich David Stich filed a brief containing fake AI-generated quotes and did not review those citations before filing the brief. This Court has the “inherent power to ‘manage [its] own affairs so as to achieve the orderly and expeditious disposition of cases.’” *United States v. Seltzer*, 227 F.3d 36, 41 (2d Cir. 2000) (quoting *Chambers v. NASCO, Inc.*, 501 U.S. 32, 50, 115 L. Ed. 2d 27, 111 S. Ct. 2123

(1991)). Courts can invoke that inherent authority to address attorney conduct and impose sanctions. See *id.*; see also *Palmer v. Simon's Agency, Inc.*, 833 F. App'x 838, 839 (2d Cir. 2020). A finding of bad faith is not a prerequisite to impose sanctions. *Id.* See also *Seltzer*, 227 F.3d at 41. Absent a finding of bad faith, attorneys can only be sanctioned for conduct that involves “a lawyer’s negligent or reckless failure to perform his or her responsibility as an officer of the court.” *Seltzer*, 227 F.3d at 41. But to sanction attorney conduct “that is integrally related to the attorney’s role as an advocate for his or her client,” *id.* at 40, courts must first find that the attorney acted in bad faith. *Id.* b. Stephanie Stich In a telephone call to my chambers, Stephanie Stich failed to disclose to this Court that she and David Stich sought to file a different version of their brief because it contained fake AI-generated quotes. The Connecticut Rules of Professional Conduct govern Stephanie Stich’s behavior.² Under Rule 3.3 of the Connecticut Rules of Professional Conduct, Stephanie Stich has a duty of candor to the tribunal. Conn. Rules of Pro. Conduct 3.3. IV. Discussion a. David Stich On behalf of the plaintiff, David Stich filed a memorandum of law in

opposition to the defendants' motion for summary judgment. That brief contained multiple AI-generated quotes from legal authorities that did not contain those quotes. For instance, the plaintiff maintained that he was individually covered under the Fair Labor Standards Act ("FLSA"). In support of that argument, the brief cited *Pineda v. Frisolino, Inc.*, 2017 WL 3835882 (S.D.N.Y. Aug. 29, 2017). Pineda is a real decision dealing with the

2 Rule 83.2(a)(1) of the District of Connecticut Local Rules subjects attorneys practicing in the District of

Connecticut to the Connecticut Rules of Professional Conduct. See *Phillips v. Berlex Labs., Inc.*, 2006 U.S. Dist. FLSA. The brief then quoted Pineda as stating that "any regular contact with goods that have moved in interstate commerce is sufficient." Doc. No. 71 at 18-19. That reveals the problem: the quoted language does not appear in the Pineda decision. The brief used the Pineda quote to help establish individual coverage, leaving the plaintiff with arguments based on fake law. By causing that avoidable legal mishap, David Stich "negligent[ly]...[failed] to perform [his] responsibility as an officer of the court." Seltzer, 227 F.3d at 41. He used an AI tool, the tool then generated fake quotes, and he based arguments on those fake quotes. Most importantly, David Stich never "conduct[ed] a reasonable inquiry into the viability of" the brief. See *Cojom*, 2025 LX 524310 at *5 (quoting *AJ Energy LLC v. Woori Bank*, 829 F. App'x 533, 535 (2d Cir. 2020) (summary order)). David Stich's conduct was not "part of [his] legitimate efforts at zealous advocacy for the client." Seltzer, 227 F.3d at 40. Accordingly, to impose sanctions, I need not find that David Stich acted in bad faith. *Id.* David Stich's conduct negatively impacted his client, the opposing parties and their counsel, and this Court. David Stich deprived his client of arguments "based on legitimate judicial precedent." See *Cojom*, 2025 LX 524310 at *7. The opposing parties and their counsel had to contend with "arguments based on phony law." *Id.* Finally, this Court expended time and resources to investigate and address David Stich's conduct. I must also consider David Stich's response to his errors. He admitted that he did not check the quotes and citations produced by the AI tool and took responsibility for those errors. See Doc. No. 83 at 2. He then committed to never using any AI research tools for legal practice and to taking continuing legal education programs on the responsible use of AI in legal practice. *Id.* Balancing David Stich's accountability for his errors against his irresponsible use of AI in a legal filing, I order that David Stich must (a) complete at least three hours of continuing legal education on the responsible use of AI in legal practice, and (b) share his new knowledge regarding AI and legal practice with the Connecticut legal community in written form (e.g., a blog post, op-ed, or letter to the editor). b. Stephanie Stich As stated previously, Stephanie Stich contacted my chambers and asked about filing a "corrected version" of the brief. See Doc. No. 84 at 2. However, Stephanie Stich was not candid with my chambers. She never acknowledged that they sought to file a "corrected version" because the filed version contained hallucinated AI-generated quotes. After I ordered Stephanie Stich to show cause why she should not be sanctioned for her lack of candor, she responded in a contrite and productive manner. She apologized for her conduct and indicated that she was

currently enrolled in continuing legal education programs on the responsible use of AI in legal practice. See Doc. No. 84 at 2. Although Stephanie Stich may not have been entirely candid with this Court, her conduct does not merit sanctions. She did not lie or deceive this Court. She did not make a “a false statement of fact or law.” Conn. Rules of Pro. Conduct 3.3. I therefore decline to impose sanctions on Stephanie Stich. V. Conclusion For the reasons discussed above, I order that David Stich (a) complete at least three hours of continuing legal education on the responsible use of AI in legal practice, and (b) share his new knowledge regarding AI and legal practice with the Connecticut legal community in written form. I decline to impose sanctions on Stephanie Stich. So ordered. Dated at Bridgeport, Connecticut, this 6th day of February 2026.

/s/ STEFAN R. UNDERHILL

Stefan R. Underhill United States District Judge