

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.