

DISTRICT COURT OF APPEAL OF FLORIDA, SECOND DISTRICT

Straub v. Henderson, Margaret McShane Revocable Trust

No. 2D2025-1787 (Fla. 2d DCA Feb. 25, 2026) · No. 2D2025-1787 · Decided February 25, 2026

SUMMARY

The Florida Second District Court of Appeal affirmed the circuit court in an appeal involving Christopher Straub and Melissa Henderson, as successor trustee of the Margaret McShane Revocable Trust. The court cited authorities addressing the use of fictitious or hallucinated case citations in court filings.

OPINION

PER CURIAM.

DISTRICT COURT OF APPEAL OF FLORIDA SECOND DISTRICT CHRISTOPHER STRAUB, Appellant, v. MELISSA HENDERSON, as Successor Trustee of the Margaret McShane Revocable Trust Dated March 24, 2016, Appellee. No. 2D2025-1787 February 25, 2026 Appeal from the Circuit Court for Hillsborough County; Emily A. Peacock, Judge. Christopher Straub, pro se. Marc C. Mann of Berlin Patten Ebling PLLC, Tampa, for Appellee.

PER CURIAM. Affirmed. See Clerk of Ct. & Comptroller for 13th Jud. Cir., Hillsborough Cnty. v. Rangel, No. 2D2024-1772, 2025 WL 2486314, at *2 (Fla. 2d DCA Aug. 29, 2025) ("[T]he dangers of relying on generative artificial intelligence have been discussed in the media, in legal publications, and in court opinions."); Takefman v. Pickleball Club, LLC, 418 So.

3d 826, 827 (Fla. 3d DCA 2025) ("We write, however, to address an issue of growing concern—the proliferation of fake or hallucinated case citations in court filings.... Opposing counsel, and the court, should not have to parse case citations and parentheticals to discern whether cases exist, and if so, if they stand for the propositions asserted."), reh'g denied (Sept.

11, 2025); Goya v. Hayashida, 418 So. 3d 652, 655 (Fla. 4th DCA 2025) ("An attempt to persuade a court or oppose an adversary by relying on fake opinions is an abuse of the adversary system." (quoting Park v. Kim, 91 F.4th 610, 615 (2d Cir. 2024))); see also Gutierrez v. Gutierrez, 399 So. 3d 1185, 1187-88 (Fla. 3d DCA 2024) (dismissing pro se appellant's appeal and imposing sanctions for filing briefs that contained "fictitious and nonexistent case law").

LUCAS, C.J., and NORTHCUTT and ATKINSON, JJ., Concur. Opinion subject to revision prior to official publication. 2

Retrieved from lawtools.ai · <https://lawtools.ai/cases/state/district-court-of-appeal-of-florida-second-district-district-court-of-appeal-of-florida-second-distr/2026/straub-v-henderson-margaret-mcshane-revocable-trust-r9ananpx>