Ref. M00DD215
Dudley Appeal 18 of 2025

IN THE COUNTY COURT AT DUDLEY (SITTING AT WALSALL APPEALS CENTRE)

Bridge House
Bridge Street
Walsall

Before HIS HONOUR JUDGE GRIMSHAW

IN THE MATTER OF

MRS SABRENA RODNEY **(Appellant/Claimant)**

-v-

(1) GEE'Z MICRO BAR & PITSTOP
(2) DIRECT PROPERTY LETTINGS LTD
(3) MR & MRS JANJUA **(Respondents/Defendants)**

THE APPELLANT appeared in person
THE FIRST RESPONDENT did not attend and was not represented
THE SECOND RESPONDENT did not attend and was not represented
THE THIRD RESPONDENTS were not present and not represented

MR MAHMOOD HUSSAIN (Solicitor) appeared in person

JUDGMENT
23rd APRIL 2026
(APPROVED BY HIS HONOUR JUDGE GRIMSHAW)

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HIS HONOUR JUDGE GRIMSHAW:

1. This is my ex tempore judgment in this matter relating to an issue that arose before me at the hearing of an appeal in this case on 3 March 2026. The issue concerned the use of artificial intelligence, which I will just refer to as "AI" for the purposes of this judgment, by the Appellant's then solicitors, AML Legal Solicitors and Commissioners for Oaths.

2. I can set out the background relatively briefly. The underlying claim related to a small claims matter about the return of goods. Summary judgment was entered against the Claimant, who became the Appellant, on 6 October 2025. The Appellant appealed and I granted that appeal in part on 3 March 2026. The substance of that appeal matters not for the purposes of this hearing. This hearing has been listed of the court's own motion to deal with the issue of the preparation for that appeal.

3. In short, three key documents were filed by the Appellant's then solicitors (AML Legal now having come off the record as representing the Appellant) in support of her application for permission to appeal, which contained incorrect citation of legal authorities with the suspicion, at the very least, that those documents had been created using AI. This was initially flagged to the court by way of a skeleton argument filed by counsel representing the Respondent to the appeal, who were the Third Defendants to the underlying proceedings. Counsel variously described the citation of the authorities in this appeal as: "*deeply troubling*".

4. As I have already indicated, three documents were filed, which I will consider in turn.

(1) Statement of Case and Grounds of Appeal

5. First was a document entitled 'Statement of Case and Grounds of Appeal' (noting there is a typo there), which was endorsed by a form of statement of truth which read as follows: "*I believe that the facts stated in this statement of case are true.*" It is signed by M Hussain who was said to be "*Solicitor, AML Legal*". It is dated 26 October 2025, which is the same date as the Appellant's Notice. I will simply refer to this as "the Grounds Document". That document appeared to contain an issue in terms of the citation of at least one legal authority, namely the citation of the case *C v C* [2021] EWCA Civ 162, which was cited in support of a submission about totally without merit orders. That neutral citation number quoted in fact appears to relate to the case of *R (Children: Control of Court Documents)* and that case

appears to be about disclosure in family proceedings and not civil proceedings and/or totally without merit orders.

6. I also note that this document has the following sentence within it:

> "*The lease relied on for forfeiture was unsigned by the landlord (see LEAP evidence bundle) pp [ref].*"

The significance of this will become apparent shortly.

7. As I say, that document appears to have been filed, from what I can see from the court file, alongside the Appellant's Notice.

8. The matter initially came before me for directions on paper and I made a number of standard directions for appeal cases. Those directions led to an appeal bundle being filed. That appeal bundle was filed in compliance with my order and was filed on or around 22 December 2025, seemingly by Ms Kossar Qureshi, a solicitor and director of AML Legal.

9. Today before me, as he has stated in witness statements before, Mr Hussain has repeated that he was responsible for the conduct of the case. However, having gone back and checked again, the email filing the bundle is clearly signed off by Ms Qureshi.

10. The purpose of this bundle was so that the court could consider the issue of whether to grant permission to appeal on the papers pursuant to Civil Procedure Rule 52.4. That bundle contained two further relevant documents: firstly, a skeleton argument on behalf of the Appellant (I will simply refer to this as "the Original Skeleton Argument") and secondly, three pages within a section of the bundle simply entitled "Authorities". I will refer to that as "the Authorities Document" and will address each of these documents in turn.

(2) The Skeleton Argument

11. The skeleton argument, again, has the appearance of a document that has potentially been generated using AI. It does not contain a statement of truth but at the end of that document appears the words: "*Ms Kossar Qureshi, AML Legal*" in a way that a skeleton argument may be signed off by the author of that document. To all intents and purposes, it looks to be a document filed by Ms Qureshi. I will return to this later. This document, again, contains concerning features which can be summarised as follows:

(1) The case of *C v C*, incorrectly cited, i.e. with the incorrect neutral citation, is used again, but this time in support of a submission about the court ordering amendment of a defective pleading rather than summarily dismissing the claim. As I have stated, the neutral citation number quoted appears to relate to the *R (Children: Control of Court Documents)* case, i.e. a case about disclosure in family proceedings.

(2) There was the deployment of the case of *Lloyds TSB Bank plc v Markandan & Uddin* [2012] EWCA Civ 65 in relation to summary judgment, it not being clear as to the relevance of this decision. There is also a comment/statement on page 108 of the appeal bundle as follows: "*Your case contained disputed facts about re-entry*", which does not appear to fit in the context of that document.

(3) There was the citation of a case said to be *Grace v Black Horse Limited* with a citation of [2014] EWCA Civ 1091, when that neutral citation number actually relates to the case of *R (on the application of Grace) v Secretary of State for the Home Department*. I pause there to note that the correct case with the correct neutral citation was cited elsewhere in another document.

(3) The Authorities Document

12. The Authorities Document is completely different. That document appears to list a number of propositions of law set out as a list numbered D1 through to D8. It appears to be a summary of legal propositions with a brief summary of the principle and then reference to either rules or case law. The document is not attributed to an author but appears to contain legal analysis. There are a number of concerning features about this document, which can be summarised as follows:

(1) The case of *Lloyds TSB Bank plc v Markandan & Uddin* is again cited. The same statement/comment is noted in this document, namely: "*Your case contained disputed facts about re-entry*", which again raised suspicion that this document appeared to be AI generated.

(2) There was a deployment of the case of *Al Saud v Apex Global Management Limited* [2014] EWCA Civ 1106 in relation to summary judgment, it not being clear as to the relevance of that decision.

(3) On page 105 of the bundle there is another statement/comment raising suspicions about use of AI, where it states: "*Relevance: your client was a litigant in person*", which suggests, as I say, that the document appeared to be advice churned out by a system utilising artificial intelligence as opposed to a document that had been drafted by a human lawyer.

13. That appeal bundle was then placed before His Honour Judge Boora, who, on 5 January 2026, decided not to deal with the permission to appeal application on paper, but instead listed the case for an appeal hearing, I assume intended to be a 'rolled-up' appeal hearing. That hearing was then listed before me on 5 March 2026.

14. Ahead of the hearing the Appellant herself instructed counsel, who filed a skeleton argument dated 25 February 2026. Needless to say, that skeleton argument did not rely upon the erroneously cited authorities. I have been told by Mr Hussain that counsel was instructed in part because, ahead of that instruction, AML Legal became aware that counsel for the Respondent had raised concerns about the cited authorities and therefore AML Legal, or the Appellant, instructed counsel so that an alternative skeleton argument could be drafted and filed.

15. A new appeal bundle was also filed for the appeal hearing before me. The previous skeleton argument had been removed, however both the Grounds Document and Authorities Document remained within the appeal bundle. To all intents and purposes, they appeared to still be part of the Appellant's case on appeal.

16. As I have already indicated, I dealt with the appeal hearing on 5 March 2026. Given the concerns that had been raised by counsel for the Respondent and indeed upon my review of the documents, I directed that the Appellant's (now former) solicitors file witness statements to explain to the court what had happened. I recorded in that order the various concerns that had been raised about the documents filed, which included:

a. The reference to the case of *C v C*, with an incorrect citation and where it appeared to have been used in support of two separate legal propositions, neither of which it in fact did support.

b. The deployment of the cases of *Lloyd's TSB Bank* and *Al Saud*.

c. The incorrect citation of *Grace v Black Horse Limited* when it was in fact *R (on the application of Grace) v Secretary of State for the Home Department*.

d. The references that suggested the documents had been generated using artificial intelligence.

17. The order specifically raised the issue of incorrect authorities being placed before the court, whilst also flagging the case of the *R (Ayinde) v London Borough of Haringey* [2025] EWHC 1383 (Admin) and the issues that may arise from the same. I noted that the issue of contempt of court may need to be considered and, as such, the solicitors concerned should take legal advice or consider taking legal advice and had a right against self-incrimination. I directed a hearing be listed before me for both solicitors to attend in person.

18. Both Ms Qureshi and Mr Hussain duly filed witness statements and requested that I stand them down from attending before me. To be fair to Mr Hussain, he was, dare I say, more helpful within his witness statement about providing an explanation and appeared to remain willing to attend before me, albeit had holiday booked for the date that was originally set. Ms Qureshi appeared far less keen to appear before me.

19. In summary, Ms Qureshi stated as follows. Ms Qureshi did not draft, supervise or review the Original Skeleton Argument or Grounds Document referred to in my 5 March order. This work was undertaken by Mr Hussain, a consultant solicitor at the firm. Ms Qureshi's stated that her name appeared on the skeleton argument filed as she is the director of the firm and documents generated through the firm's case management system routinely displayed her name as the firm's principal. I pause here to say that I struggle with that explanation, given that most of the documents filed do *not* in fact have Ms Qureshi's name on them, nor is she identified as the principal of the firm on the Original Skeleton Argument. I will come back to that point shortly.

20. Ms Qureshi stated that she had no involvement in the legal research or citation of authorities that my order referred to. Ms Qureshi stated that she accepted the seriousness of the concerns raised and stated that she had reviewed the firm's internal procedures and ensured additional safeguards are now in place. She confirmed that she had read the guidance or had then read the guidance from the Solicitors Regulation Authority, hereinafter just referred to as "the SRA", and the Law Society regarding AI technology.

21. Ms Qureshi stated that she wanted to reassure the court that her firm takes the matters seriously and that they will not happen again, as well as apologising to the court, but she went on to state that she did not believe her personal attendance at any hearing would assist the court, so asked for me to stand her down from any such hearing.

22. Mr Mahmood Hussain provided a more detailed witness statement. In that statement he states that he qualified as a solicitor in 1995 and has worked at various firms, including being a partner and senior partner, having opened his own practice in 2004. In addition, he works as a consultant solicitor at AML Legal. He states that he has never been criticised by a judge for his conduct previously or ever personally been called before any conduct hearing by the SRA or other regulatory body. He accepted that he made an omission in carrying out his duties and had not intentionally misled the court.

23. He confirmed that he was the sole supervising solicitor responsible for the drafting and preparation of the appeal documentation, including the Statement of Case, Grounds of Appeal and the Original Skeleton Argument. Those documents were prepared with the assistance of a paralegal. He accepts that he should have checked the legal research of the paralegal before the documents were submitted and takes full responsibility.

24. He states that Ms Qureshi did not prepare or supervise the documentation, repeating the explanation that Ms Qureshi's name appeared on the skeleton argument:

> "*solely because the firm's standard template automatically inserts the name of the director of the firm within the document header. It is automatically generated through the software. I should reviewed [there is a typo there] this and changed this to my name.*"

For the reasons I have already mentioned, I struggled to understand this explanation, in large part because the name was not in a document header, it was at the end of the Original Skeleton Argument with the appearance of a lawyer signing off a pleading or skeleton argument.

25. In any event, in terms of the preparation of the Authorities Document, Mr Hussain explained that the paralegal assisting him had used electronic legal research tools and the firm's case management software, including the LEAP practice management system and its legal research assistant tools, to assist in identifying and summarising potentially relevant legal authorities. Mr Hussain stated that those summaries were used as internal working

notes during the drafting process and were intended to be checked and verified before filing and serving. Mr Hussain reviewed the said documents but did not verify the authenticity of the cases or the citations, an oversight that he admits and takes full responsibility for.

26. Mr Hussain accepted that the authority of *Lloyd's TSB* should not have been used and is not relevant to the issues in the appeal. Similarly, Mr Hussain accepted that *Al Saud* was not relevant to any issues in the appeal. He accepted that the paralegal may have used AI and that the summaries prepared should not have been included within the appeal bundle.

27. Mr Hussain stated that he was alerted to the issues when served with the Respondent's counsel's skeleton argument. He then instructed counsel to review the documents and prepare a revised skeleton argument, which was filed about two weeks later. This new skeleton argument contained a note at the outset acknowledging that the previous skeleton argument filed "*contained a number of inaccurate case citations*" and that the new skeleton argument was intended to supersede the previous document in its entirety.

28. Mr Hussain stated that:

> "*Ms Qureshi and Mr Hussain have reviewed AML Legal's internal procedures concerning the preparation of court documents and the citation of legal authorities. Additional safeguards have now been implemented.*"

He confirmed that he had now read the guidance from the SRA and the Law Society regarding AI technology.

29. Mr Hussain offered an unreserved apology, accepting that it was a serious incident and that he deeply regretted his conduct and was committed to ensuring that it does not occur again in future.

30. I declined to cancel the hearing listed before me but relisted it so that Mr Hussain could attend. That is the hearing listed before me today.

31. On 21 April 2026, i.e. two days ago, Ms Qureshi filed a supplemental witness statement asking to be excused from the hearing before me today due to medical issues, supported by medical evidence. She also filed a copy of an Open University 'Statement of Participation' for an 'Understanding Generative AI' course dated 19 April 2026, i.e. two days before the statement was filed. That supplemental witness statement also repeats many of the same points from her first statement, including that procedures at her firm had been

tightened, training had been undertaken, and that she apologised to the court. Ms Qureshi accepted that, as director of the firm, she bears overall responsibility for the systems, supervision, and safeguards of the firm and she states:

> "*With the benefit of hindsight I [she] accepts that further safeguards and training should have been implemented at an earlier stage to prevent the risk of unverified material being included within documents filed at court.*"

32. I should note that the supplemental witness statement had the old statement of truth on it, which rather does raise an eyebrow as to whether Ms Qureshi has truly taken on board the seriousness of ensuring that properly drafted documents are placed before the court, but I do note that she appears to be suffering from a period of ill health and I do not hold that against her in and of itself.

33. Given the medical reasons identified by Ms Qureshi, I directed that she could be excused from attending the hearing before me today. I decided to proceed without her on the basis that Mr Hussain has taken full responsibility for what has gone on. However, in my judgment, Ms Qureshi does still bear some responsibility as the director of the firm and for the reasons that I have set out above regarding her name being on the documents, and concerns as to how her name came to be on the Original Skeleton Argument.

34. Ahead of the hearing today Mr Hussain hand-delivered written submissions in which he essentially repeated a summary of his witness statement, again apologising to the court. He also provided a similar Open University 'Statement of Participation' for an 'Understanding Generative AI course', dated the same date, 19 April 2026.

35. Mr Hussain has appeared before me today, representing himself, and reiterated what he has said in both his witness statement and written submissions. I have formed the view that Mr Hussain is genuinely remorseful for what has happened. I accept the explanations that he has provided to me to be genuine and I also accept that he is genuinely remorseful. He asks me not to refer him to the Solicitor's Regulation Authority as, to put it simply, everyone has learned from these events.

36. The reality is, however, and as Mr Hussain accepts, misleading material was placed before the court in terms of mis-cited legal authorities, said to support propositions that they simply did not, when even the most simple of checks would have shown that not to be the

case, or shown it to be the case, i.e. that they were incorrect. That is inexcusable on the part of a professionally qualified lawyer. The fact that one document was endorsed with a statement of truth signed by that same solicitor makes that criticism all the more valid, in my judgment. I therefore have to consider what steps, if any, I should take given the admitted failings in this case.

37. I have referred myself to the Divisional Court decision in the case of *R (Ayinde) v London Borough of Haringey* [2025] EWHC 1383 (Admin), and I note the following salient points.

38. In a comprehensive judgment setting out the legal position, the President of the King's Bench Division sets out various starting points at paragraphs 4 through to 9 of the judgment. I read them onto the court record:

> "*4. Artificial intelligence is a powerful technology. It can be a useful tool in litigation, both civil and criminal. It is used for example to assist in the management of large disclosure exercises in the Business and Property Courts. A recent report into disclosure in cases of fraud before the criminal courts has recommended the creation of a cross-agency protocol covering the ethical and appropriate use of artificial intelligence in the analysis and disclosure of investigative material.1 Artificial intelligence is likely to have a continuing and important role in the conduct of litigation in the future.*
>
> *5. This comes with an important proviso however. Artificial intelligence is a tool that carries with it risks as well as opportunities. Its use must take place therefore with an appropriate degree of oversight, and within a regulatory framework that ensures compliance with well-established professional and ethical standards if public confidence in the administration of justice is to be maintained. As Dias J said when referring the case of Al-Haroun to this court, the administration of justice depends upon the court being able to rely without question on the integrity of those who appear before it and on their professionalism in only making submissions which can properly be supported.*
>
> *6. In the context of legal research, the risks of using artificial intelligence are now well known. Freely available generative artificial intelligence tools, trained on a large language model such as ChatGPT are not capable of conducting reliable legal research. Such tools can produce apparently coherent and plausible responses to prompts, but those coherent and plausible responses may turn out to be entirely incorrect. The responses may make confident assertions that are simply*

untrue. They may cite sources that do not exist. They may purport to quote passages from a genuine source that do not appear in that source.

7. Those who use artificial intelligence to conduct legal research notwithstanding these risks have a professional duty therefore to check the accuracy of such research by reference to authoritative sources, before using it in the course of their professional work (to advise clients or before a court, for example). Authoritative sources include the Government's database of legislation, the National Archives database of court judgments, the official Law Reports published by the Incorporated Council of Law Reporting for England and Wales and the databases of reputable legal publishers.

8. This duty rests on lawyers who use artificial intelligence to conduct research themselves or rely on the work of others who have done so. This is no different from the responsibility of a lawyer who relies on the work of a trainee solicitor or a pupil barrister for example, or on information obtained from an internet search.

9. We would go further however. There are serious implications for the administration of justice and public confidence in the justice system if artificial intelligence is misused. In those circumstances, practical and effective measures must now be taken by those within the legal profession with individual leadership responsibilities (such as heads of chambers and managing partners) and by those with the responsibility for regulating the provision of legal services. Those measures must ensure that every individual currently providing legal services within this jurisdiction (whenever and wherever they were qualified to do so) understands and complies with their professional and ethical obligations and their duties to the court if using artificial intelligence. For the future, in Hamid hearings such as these, the profession can expect the court to inquire whether those leadership responsibilities have been fulfilled."

39. I pause there to make two observations. Firstly, the reference to *Hamid* is a reference to the system where there is in fact a judge known as the 'Hamid Judge', who is a High Court Judge to whom applications such as these might be referred when there is concern about matters such as those raised today (*R (Hamid) v Secretary of State for the Home Department* [2012] EWHC 3070 (Admin), [2013] CP Rep 6). Secondly, the judgment of the Divisional Court in *Ayinde* was handed down on 6 June 2025, i.e. long pre-dating the current matters

before me. It was a widely publicised decision, and it seems to me that all legal professionals should have been aware of it and what was said within that judgment.

40. In any event, as the judgment in *Ayinde* goes on to consider, there is not a shortage of professional guidance available about the limitations of artificial intelligence. I will not go through all of the examples cited by the Divisional Court, save to say that on 20 November 2023, i.e. two years before these events, there was a document published by the Solicitor's Regulation Authority entitled '*Risk Outlook Report: The Use of Artificial Intelligence in the Legal Market*', which stated that:

> "*All computers can make mistakes. AI language models such as ChatGPT, however, can be more prone to this. That is because they work by anticipating the text that should follow the input they are given, but do not have a concept of 'reality'. The result is known as "hallucination" where a system produces highly plausible but incorrect results.*"

41. I should note that guidance is also given to judges as is set out by paragraph 15 of the *Ayinde* judgment. That guidance was first provided in December 2023, updated in April 2025 and then updated again on 31 October 2025, and is published on the Judiciary website. As the Divisional Court pointed out, its contents are as relevant to the use of artificial intelligence by lawyers as they are to its use in the Judiciary.

42. At paragraph 16 of *Ayinde*, the President goes on to state as follows:

> "*Importantly, the guidance says that: "All legal representatives are responsible for the material they put before the court/tribunal and have a professional obligation to ensure it is accurate and appropriate." It warns about the risks of using generative artificial intelligence for legal research or legal analysis: "Legal research: AI tools are a poor way of conducting research to find new information you cannot verify independently. They may be useful as a way to be reminded of material you would recognise as correct. Legal analysis: the current public AI chatbots do not produce convincing analysis or reasoning.*"

43. At paragraph 22 of the judgment, the Divisional Court goes on to consider the regulatory duties of solicitors. The President states that "*the position is materially similar for solicitors*", having just conducted an analysis of the Barrister's Code of Conduct, stating:

> "*The Code of Conduct of the Solicitors Regulation Authority (the SRA) describes the standards of professionalism that the SRA and the public expects of individuals authorised by the SRA to provide legal services. The SRA's Rules of Conduct provide in part as follows. Solicitors are under a duty not to mislead the court or others including by omission (Rule 1.4). They are under a duty only to make assertions or put forward statements, representations or submissions to the court or others which are properly arguable (Rule 2.4). They are under a duty not to waste the court's time (Rule 2.6). They are under a duty to draw the court's attention to relevant cases and statutory provisions of which the lawyer is aware and which are likely to have a material effect on the outcome (Rule 2.7). They are under a duty to provide a competent service (Rule 3.2). Further, where work is conducted on a solicitor's behalf by others, the solicitor remains accountable for the work (Rule 3.5).*"

44. The Divisional Court then went on to consider the court's powers from paragraph 23 onwards. I will not read all of those paragraphs onto the court record but will deal with the salient paragraphs.

45. Paragraph 23:

> "*The court has a range of powers to ensure that lawyers comply with their duties to the court. Where those duties are not complied with the court's powers include public admonition of the lawyer, the imposition of a costs order, the imposition of a wasted costs order, striking out a case, referral to a regulator, the initiation of contempt proceedings, and referral to the police.*"

46. Paragraph 24:

> "*The court's response will depend on the particular facts of the case. Relevant factors are likely to include: (a) the importance of setting and enforcing proper standards; (b) the circumstances in which false material came to be put before the court; (c) whether an immediate, full and truthful explanation is given to the court and to other parties to the case; (d) the steps taken to mitigate the damage, if any; (e) the time and expense incurred by other parties to the case, and the resources used by the court in addressing the matter; (f) the impact on the underlying litigation and (g) the overriding objective of dealing with cases justly and at proportionate cost*"

47. In terms of contempt of court, the Divisional Court goes on to state at paragraph 26 that:

> "*Placing false material before the court with the intention that the court treats it as genuine may, depending on the person's state of knowledge, amount to a contempt. That is because it deliberately interferes with the administration of justice. In R v Weisz ex p Hector Macdonald Ltd [1951] 2 KB 611 Lord Goddard CJ, Hilbery J and Devlin J held that an attempt to deceive a court by disguising the true nature of the claim by the indorsement on a writ (a claim for an unenforceable gambling debt dressed up as a claim for "an account stated") amounted to a contempt. As to the requisite state of knowledge, mere negligence as to the falsity of the material is insufficient. There must be knowledge that it is false, or a lack of an honest belief that it is true: JSC BTA Bank v Ereschchenko [2013] EWCA Civ 829 per Lloyd LJ at [42], Newson-Smith v Al Zawawi [2017] EWHC 1876 (QB) per Whipple J at [12], Norman v Adler [2023] EWCA Civ 785 [2023] 1 WLR 4232 per Thirlwall LJ at [61].*"

48. Paragraph 28 states that:

> "*Where the court considers that a contempt of court may have been committed, it shall, on its own initiative, consider whether to initiate contempt proceedings: CPR 81.6. This is a two-stage process. The first, or threshold, stage is the assessment of whether a contempt may have been committed. The second is an evaluative judgment as to whether contempt proceedings should be initiated.*"

49. At paragraph 29, the Divisional Court stated that:

> "*Where a lawyer places false citations before the court (whether because of the use of artificial intelligence without proper checks being made, or otherwise) that is likely to involve a breach of one or more of the regulatory requirements that we have set out above, and it is likely to be appropriate for the court to make a reference to the regulator.*"

50. In terms of admonishment, that is addressed at paragraph 31:

> "*Submissions were made to us as to the salutary effect of public admonishment, thereby mitigating any requirement to refer lawyers to their regulatory bodies or to deal with the matter as a contempt. We do not underestimate the impact of public criticism in a court judgment or indeed of appearing before a Divisional Court in circumstances such as these. However, the risks posed to the administration of justice if fake material is placed before a court are such that, save in exceptional circumstances, admonishment alone is unlikely to be a sufficient response.*"

51. I have also referred myself to the decision of His Honour Judge Charman in the case of *Ndaryiyumvire v Birmingham City University and Others*, which he heard on 14 October 2025 in the County Court at Birmingham.

52. As has been highlighted by those two decisions, the use of AI before the courts appears to be increasing exponentially, particularly by litigants in person. The court is entitled to expect that any legal authority placed before the court is done so accurately and is indeed authority for the proposition relied upon by the party citing it. This is particularly the case where that party is legally represented and where the submission is made by a qualified lawyer. It is even more so when the document is verified by a statement of truth. Placing incorrect or misleading authorities before the court creates a huge additional burden and undermines the confidence the court may have in filed written submissions. It has been accepted that Mr Hussain put forward fictitious, or certainly incorrectly cited, authorities before the court. It can be in no doubt that this was improper conduct.

53. I do have to take account of the fact that, as was said in *Ayinde*, the use of AI is a large and growing problem and the citation of fictitious or fake authorities is a serious threat to the integrity of the justice system, which depends upon courts being able to rely on lawyers putting before the courts, whether orally or within documentation, accurate material and accurate statements of the law that are supported by genuine cases that stand for the propositions that are cited by the person or party relying on the authority. Lawyers who cite fictitious cases must face serious consequences and, in the current environment, where this is a problem that is significant (and indeed seems to be growing), the guidance in *Ayinde* indicates that judges should take a robust approach. The importance of setting and enforcing proper standards cannot be underestimated.

54. As such, whilst perhaps not at the higher end of the scale of seriousness in the present case, I do consider the failings in this case to be serious. I therefore have to consider whether contempt proceedings are appropriate.

55. In my judgment, having considered what was said at paragraph 26 of *Ayinde*, I cannot and could not be satisfied that there is sufficient evidence of the requisite state of knowledge, i.e. that the information put before the court was false. As stated within that paragraph, mere negligence as to the falsity of the material is insufficient.

56. In any event, where there is potential that a contempt of court may have been committed, I have to go on to consider the two-stage test when deciding whether to initiate contempt proceedings:

(1) First (or the threshold stage) is the assessment of whether a contempt may have been committed. Given I have formed the view that it is unlikely there would be sufficient evidence to ground a suggestion that there was a deliberate attempt to place misleading material before the court (i.e. with the requisite state of knowledge), it seems to me that the threshold stage is unlikely to be met.

(2) In any event, the second stage is an evaluative judgment as to whether contempt proceedings should be initiated. I have also considered whether to make a referral to a '*Hamid* Judge'. It seems to me that contempt proceedings and/or a referral to a '*Hamid* Judge' would be disproportionate in the instant case. I have reached that conclusion for the following reasons:

   (a) The incorrect citation of authorities appears to have been due to a reckless disregard for ensuring accuracy rather than a deliberate attempt to mislead.

   (b) I accept that the solicitors appear to have put a cogent explanation for the failures before the court.

   (c) Both solicitors have apologised unreservedly to the court, particularly Mr Hussain.

   (d) Both solicitors have stated that supervision and other compliance measures at AML Legal have been strengthened.

(e) Both solicitors have sought to improve their understanding of artificial intelligence.

(f) All of the cases did in fact seem to exist, albeit some with different citations and none being on point for the reasons accepted by Mr Hussain and as I have set out.

(g) There was not any significant causative effect to this specific litigation, save for the increased use of court time, which of course does run counter to the overriding objective and is a factor to take into account.

(h) When the problems with the citations were raised with AML Legal, they took action to abandon reliance on the Original Skeleton Argument (albeit not the other documents), instructing counsel to draft an alternative skeleton argument explicitly noting the previous citation problems.

(i) As I will come on to explain, Mr Hussain, Ms Qureshi and AML Legal will also be criticised in a public judgment and will be referred to the Solicitors Regulation Authority for further investigation.

57. I have therefore gone on to consider whether public admonishment would suffice in this case. I repeat paragraph 31 of the *Ayinde* judgment. It seems to me that this is a prime example of a case where, given the material was deliberately, albeit probably negligently, deployed, admonishment alone is insufficient.

58. Given the seriousness of what has happened, I am of the view that both solicitors ought to be referred to the Solicitors Regulation Authority so that their regulatory body can decide whether any further action should be taken against either solicitor personally, or in terms of AML Legal, given it appears to me that there may well have been a breach of the Solicitor's Code of Conduct. In my judgment, there were failures here on the part of both solicitors and the management of the firm.

59. It is important that there is a public record of this incident should anything remotely similar occur again involving AML Legal or these solicitors. I therefore direct that a transcript of this judgment be prepared at public expense and be published on the Judiciary website. A copy shall be sent to the Solicitors Regulation Authority alongside the witness statements filed by both solicitors and my order of 5 March 2026.