

June 2026

RAZOR enewsletter FROM

FROM



**O'Connor
Carnathan &
Mack**

GIVING OUR CLIENTS AN EDGE



Attorney Denied Pro Hac Vice Admission Due to History of Filing Briefs with Fake AI-Generated Cases

Judge Salinger, of the Massachusetts Superior Court Business Litigation Session, recently denied an attorney's pro hac vice application based on that attorney's history of submitting court filings with fake cases that had been hallucinated by his firm's artificial intelligence ("AI") platform.

In *Wilder v. President & Fellows of Harvard College*, Attorney T. Michael Morgan ("Morgan") of the law firm Morgan & Morgan sought to appear for the plaintiffs in a Massachusetts action. Morgan practices out of the firm's Florida office. As part of his petition to appear, Morgan disclosed that, in 2025, he had been sanctioned by a federal court in Wyoming for signing motions without reading them. Those motions had been drafted by Morgan's associate and included citations to eight non-existent, AI-generated cases.

Judge Salinger explained that Morgan's ethical violation was "quite serious" because citing a nonexistent case amounts to making a false statement to the court. He stated, "More senior attorneys have just as much responsibility as any lawyers whom they supervise to review motions and legal memoranda and ensure that they are accurate and do not contain made up case law or evidence." The court was also troubled by the fact that Morgan made "no attempt to show that he has changed his practice to comply with his obligation to review any papers filed in court over his signature, or that he has taken any steps to ensure that he and his law firm do not file motions or legal memorandum citing nonexistent case law in the future."

This case serves as yet another reminder of the importance of taking great care when drafting briefs using AI tools.

About OCM

OCM is boutique litigation firm based in Burlington, Massachusetts, whose clients include Fortune 500 companies as well as closely held businesses and astute individuals. OCM's attorneys help their clients not only resolve disputes but also avoid them altogether. Whether you are facing a courtroom battle, arbitration, mediation, or negotiation, OCM can help.





[View Our Website](#)

[Unsubscribe](#)

OCM Law 10 Burlington Mall Road Suite 301 Burlington, Massachusetts 01803 United States (781) 359-9000