

Ross LeBlanc  
Dudley DeBosier APLC  
1075 Government Street  
Baton Rouge, LA 70802  
[rmlblanc@dudleydebosier.com](mailto:rmlblanc@dudleydebosier.com)  
Cell: 504-236-2451

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Dear Judge William Jorden:

I write to take responsibility for an error made in my briefings in the *Rushing v. Turner* case (#C-742,404). I filed two motions to compel with this court which contained inaccurate quotations from the case of *Riggio v. Ports Am. La., L.L.C.*, 337 So.3d 418 (La. App. 4 Cir. 2023). While this is a true statement about financial bias impeachment, the quoted statement does not appear in the *Riggio* case. I included this inaccurate quotation in my motions to compel additional financial data from Dr. Domangue and Dr. Thomas. Here is the statement from my briefs:

**More recently, in *Riggio v. Ports Am. La., L.L.C.*, 377 So.3d 418 (La. App. 4 Cir. 2023), the Fourth Circuit reaffirmed that "evidence of the financial relationship between an expert witness and the party who engaged the expert is always admissible to show bias."**

This error is my responsibility.

Opposing counsel for Turner noticed this error and addressed it on pages 9 and 10 of its opposition to my motion to compel against Dr. Domangue. My opposing counsel requests sanctions including striking the pleadings and awarding attorney fees and costs. I have voluntarily withdrawn the pleadings with these inaccurate statements. And I apologize to opposing counsel and to the court for this error.

The statement itself is a fine argument. I should never have included quotation marks. The *Riggio* case stands for the principle that treating doctors are given special exemptions within the general rule about financial bias impeachment. I read the case, was familiar with it, and still misquoted it. This was not intentional. I am trying to understand how I made this mistake.

Opposing counsel's brief discusses how such mistakes are unconscionable, regardless of whether they are ordinary human error or the result of AI. I will not disagree. I am reviewing my recent filings with this Honorable court to determine if there are any other similar misstatements, or if this was an isolated incident. I believe my mistake was an ordinary human mistake, and I accept responsibility for it.

Earlier this year, I began using an AI program called EVE to help me draft pleadings. I was hesitant to use AI because of the horror stories I heard about hallucinated case law. EVE made several presentations to my law firm and assured me in training sessions there were safeguards in place to minimize hallucinations. As long as I did the legal research myself and instructed the EVE AI program to draw only from approved reference material, there would likely not be any hallucinations.

**EXHIBIT  
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Here is the marketing language from Eve's website:

***Can you trust your AI to do legal work? It is not enough to minimize the risk of poor answers or hallucination. At Eve, we've worked up an extra layer that we add to the RAG methodology and increase the trust (and ease of verification) of AI's answers. We call it "Trust but Verify".<sup>1</sup>***

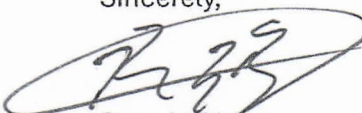
The verify feature of EVE is that there is a link after each citation that takes you to the quoted material. As I began using EVE I checked these citations often, and they were always correct when I checked them. I began to see that if I did the legal research myself and confined the software to using only my approved reference sources, that the quotations and citations would be accurate. I then read the brief over several times to check for grammatical errors and that the argument is concise and organized.

Then opposing counsel pointed out my mistake. I felt surprise, confusion, shame, and regret. I never thought this could happen to me. I cannot be entirely sure this mistake involved the EVE AI software, or if this was my personal mistake in using cut/copy/paste. Either way, the mistake is ultimately mine and I understand that.

The misquote did not catch my eye during final editing because financial relationships ARE admissible to show bias. I do not believe this statement misled the court or that my client would have benefitted from the misquote. Still, it is an error that should not happen.

In addition to this apology to the court and opposing counsel, I will be circulating a copy of this letter to the other lawyers in my firm so that they can learn from my mistake. I will review my recent filings in this court, and others, to look for mistakes. I endeavor to inform the court of all mistakes, to correct them, and to not repeat them.

Sincerely,



Ross LeBlanc

Cc:

Jen O'Connell  
Bob Barton  
Matt Sherman  
Conrad Meyer

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<sup>1</sup> [What does it mean to "trust" your AI?](#)