

2026 WL 3059644

Only the Westlaw citation is currently available.

UNPUBLISHED OPINION. CHECK
COURT RULES BEFORE CITING.Superior Court of Connecticut,
JUDICIAL DISTRICT OF TOLLAND.
AT ROCKVILLE.

SANA HAZINA BUTLER

v.

THE TRAVELERS INDEMNITY COMPANY

DOCKET NO. TTD-CV25-6034158-S

|

OCTOBER 7, 2026

Editor's Note: This document contains discussion of unverified citations, likely generated by AI tools used by a party or counsel. These citations are not attributable to the Court. The unverified citations have been preserved as part of the official record, but links are unavailable.

MEMORANDUM OF DECISION RE: SANCTION FOR PLAINTIFF'S USE OF ARTIFICIAL INTELLIGENCE

Graff, J.

*1 This matter comes before the court on its own order to show cause. In reviewing two of the self-represented plaintiff's recent filings, the court identified inaccuracies and/or artificial intelligence hallucinations. Specifically, the court reviewed the plaintiff's reply to defendant's opposition to motion for order of compliance that was filed on July 16, 2026, at Docket Entry 128 and the plaintiff's motion to vacate and set aside the court's July 6, 2026, order with prejudice that was filed on July 7, 2026, at Docket Entry 125.

On August 26, 2026, the court issued an order to show cause so that the plaintiff could be heard before the court determined whether the plaintiff used artificial intelligence and submitted documents to the court containing artificial intelligence hallucinations and inaccuracies. If the plaintiff did in fact use artificial intelligence, the court warned the plaintiff that it was considering sanctions. See Docket Entry

135. The order reads: "Potential sanctions may include monetary sanctions, the striking of the offending filing(s), restrictions on the manner of future filings, or such other relief as may be required. Failure by the plaintiff to attend the hearing and failure to comply with this order will result in sanctions." Docket Entry 135.

On August 27, 2026, the court issued a notice, scheduling the show cause hearing for October 5, 2026, at 3pm. At 2:45pm pm on October 5, 2026, the plaintiff filed a motion for continuance. In the motion for continuance, the plaintiff states that she had a transportation emergency, "Good-faith effort to appear in person by traveling from New York via Amtrack. Arrival at car rental agency, no license in purse. Will upload documents to discuss by 10/6/26." Docket Entry 139.

The court granted the motion for continuance, and continued the hearing for one day, to October 6, 2026. Docket Entry 139.10. In granting the motion for continuance, the court stated: "Failure to attend the hearing may result in sanctions up to and including dismissal." Docket Entry 139.10. The plaintiff did not upload documents as she stated she would in the motion for continuance.

The hearing went forward on October 6, 2026. The plaintiff failed to appear. The plaintiff never responded to the show cause order.

The court makes the following findings:

1. Docket Entry 125 contains inaccuracies and artificial intelligence hallucinations, including the following:
 - a. At Docket Entry 125, p. 3, the plaintiff cites to *State v. Gonzalez*, 347 Conn. 770, 786–87, 303 A.3d 1152 (2023). No such case exists at this cite. The case of *Tilsen v. Benson*, 347 Conn. 758, 770 (2023) appears at this cite and has nothing to do with the proposition at issue in this case.
 - b. At Docket Entry 125, p. 7, the plaintiff cites to *Vanderbilt v. Hartford Accident & Indemnity Co.*, 342 Conn. 215, 231 (2022). No such case exists at this cite. The case of *State v. Bruny*, 342 Conn. 169, 215 (2022) appears at this cite and has nothing to do with the proposition at issue in this case.
 - *2 c. At Docket Entry 125, p. 3, the plaintiff cites to *Financial Consulting, LLC v. Commissioner of Insurance*, 315 Conn. 196, 225, 105 A.3d 210 (2014)

and states that this case held that “standing is a practical concept designed to ensure that courts hear only justiciable controversies.” The general standing principle is accurately stated, but *Financial Consulting* does not stand for this proposition.

- d. At Docket Entry 125, p. 4, the plaintiff cites to [*Ajadi v. Commissioner of Correction*, 280 Conn. 514, 533, 911 A.2d 712 \(2006\)](#). The pinpoint cite has nothing to do with the issues in this case. Plaintiff cites *Ajadi* for the proposition that a court must dismiss an action or vacate an order whenever the prerequisites of a justiciable controversy are absent. This is not accurate and not the holding of the case.
 - e. At Docket Entry 125, p. 4, the plaintiff cites to [*Polymer Resources, Ltd. v. Keeney*, 32 Conn. App. 340, 348–49 \(1993\)](#). The plaintiff states that *Polymer Resources, Ltd.* is “binding precedent establishing that trial courts lack jurisdiction to grant protective orders or afford procedural remedies to non-parties who fail to properly intervene.” *Polymer Resources, Ltd.* holds that a community group failed to meet the standards for statutory or permissive intervention in a specific environmental and administrative context. It contains no holding about protective orders, party identification in civil litigation, or corporate caption corrections. It does not stand for the proposition that the plaintiff claims it does. The case has additionally been recognized as abrogated on other grounds. See *Diamond 67, LLC v. Planning and Zoning Comm’n of Town of Vernon* (Conn. App. Sept. 15, 2009).
 - f. At Docket Entry 125, p. 7, the plaintiff cites to [*Mulligan v. Rioux*, 229 Conn. 716, 747 \(1994\)](#). The pinpoint cite has nothing to do with the issues in this case. The plaintiff states that this case holds that “judicial efficiency requires that subsequent filings ‘strictly conform to the pleadings’ and the operative record established by the court’s orders.” *Mulligan* does not contain this language or the specifically quoted language.
2. Docket Entry 128 contains inaccuracies and artificial intelligence hallucinations including the following:
- a. At Docket Entry 128, p. 3-4, the plaintiff quotes language from [*Cologne v. Westfarms Associates*, 197 Conn. 141, 147 \(1985\)](#). The quote does not appear in the case.
 - b. At Docket Entry 128, p. 4, the plaintiff states: “[*Papa v. New Haven Federation of Teachers*, 186 Conn. 725, 737–38 \(1982\)](#) held that that the authority of a court to enforce its own orders is an inherent power that is absolutely necessary to preserve the court’s dignity and ensure the fair administration of justice.” This is not the holding of the case.
 - c. At Docket Entry 128, p. 5, the plaintiff quotes language from [*Blumberg Associates Worldwide, Inc. v. Brown & Brown of Connecticut, Inc.*, 311 Conn. 123, 148 \(2014\)](#). The quote does not appear in *Blumberg Associates Worldwide, Inc.*
 - d. At Docket Entry 128, p. 5, the plaintiff cites to *Gagne v. Vaccaro*, 311 Conn. 430, 448–49 (2012). This cite is wrong. No such case exists at this cite. The case of [*Statewide Grievance Committee v. Ganim* appears at 311 Conn. 430, 448 \(2014\)](#). *Statewide Grievance Committee v. Ganim*, 311 Conn. 430, (2014) has nothing to do with the proposition at issue in this case.
 - *3 e. At Docket Entry 128, p. 6 and p. 12, the plaintiff cites to *Rinfret v. Porter*, 314 Conn. 38, 48–49 (2014). No such case exists at this cite. The case of [*State v. Ciullo*, 314 Conn. 28 \(2014\)](#) appears at this cite and has nothing to do with the proposition at issue in this case.
 - f. At Docket Entry 128, p. 7, the plaintiff cites to [*National Hockey League v. Metropolitan Hockey Club, Inc.*, 427 U.S. 639, 643 \(1976\)](#) and states: “The United States Supreme Court held that when litigants engage in a willful, bad-faith failure to comply with precise judicial mandates, allowing them a second opportunity to re-file or correct their behavior after getting caught would dismantle the deterrent functions of the judiciary and reward strategic non-compliance.” This is not the holding and not accurate.
 - g. At Docket Entry 128, p. 9, the plaintiff cites to [*Lafayette v. General Dynamics Corp.*, 255 Conn. 762, 772 \(2001\)](#) and states: “The Connecticut Supreme Court held that collateral estoppel enforces an absolute finality on issues necessarily decided, and a party cannot claim that a willful deviation from that established reality was a mere “mistake” that can be retroactively cured or re-filed.” This is not the holding and not accurate.

- h. At Docket Entry 128, p. 9, the plaintiff cites to [*Federated Department Stores, Inc. v. Moitie*, 452 U.S. 394, 401 \(1981\)](#) and states: “The United States Supreme Court held that the strict application of preclusion doctrines leaves no room for judicial sympathy or procedural do-overs where a party has made a deliberate, strategic choice to bypass established legal orders, confirming that such choices permanently wave any right to re-file.” This is not the holding and not accurate.
- i. At Docket Entry 128, p. 9, the plaintiff cites to [*Gionfriddo v. Gartenhaus Cafe*, 211 Conn. 67, 75 \(2019\)](#) and states: “The Connecticut Supreme Court held that public policy and judicial stability firmly dictate that preclusion rules operate to prevent a party from curing a willful, structural litigation failure after getting caught, as allowing a re-filing option would undermine the finality of the court’s original adjudication.” This is not the holding and not accurate.
- j. At Docket Entry 128, p. 10, the plaintiff cites to [*State v. Wright*, 273 Conn. 418, 425–26 \(2005\)](#) and states: “The Connecticut Supreme Court held that the collateral bar rule strictly prohibits a party from reconsidering or attacking the legal or factual basis of a standing court order within a subsequent, collateral proceeding. A party’s absolute duty to obey a judicial mandate remains completely active even if the underlying order is later found to be factually or legally incorrect.” This is not the holding and not accurate.
- k. At Docket Entry 128, p. 11, the plaintiff cites to [*Walker v. Birmingham*, 388 U.S. 307, 314 \(1967\)](#) and states: “The United States Supreme Court held that respect for the judicial process requires that court orders be obeyed until they are reversed through orderly and proper appellate review channels, and that parties who choose to bypass those channels cannot later challenge the validity of the order.” This is not the holding and not accurate.
- l. At Docket Entry 128, p. 11, the plaintiff cites to [*State v. Winter*, 117 Conn. App. 493, 501 \(2009\)](#) and states: “The Connecticut Appellate Court held that the collateral bar rule prevents a litigant from using lateral moving papers or defenses to open up an active order for retroactive evaluation. The court clarified that the exclusive mechanism to challenge a court’s directive is direct appellate review, and attempting to circumvent a standing order through non-conforming filings is a procedural violation.” This is not accurate.
- *4 m. At Docket Entry 128, p. 12, the plaintiff cites to [*Maness v. Meyers*, 419 U.S. 449, 458 \(1975\)](#) and states: “The United States Supreme Court held that if a person to whom a court order is directed chooses to place themselves in a position of defiance rather than following the prescribed methods for challenging that order, they do so at their own peril and permanently wave any procedural entitlement to a retroactive remedy or re-filing option.” This is not accurate.
- n. At Docket Entry 128, p. 12, the plaintiff cites to *State v. Mattioli*, 341, Conn. 660, 674 (2021). No such case exists at this cite. The actual case at 341 Conn. 660 is *Gonzalez v. O & G Industries, Inc.* and *Gonzalez* has nothing to do with the proposition at issue in this case.
- o. At Docket Entry 128, p. 13, the plaintiff cites to [*Batte-Holmgren v. Commissioner of Public Health*, 281 Conn. 277 \(2007\)](#). The plaintiff states that Batte-Holmgren holds “that sophisticated litigants bear the absolute responsibility to ensure their filings strictly conform to governing procedural mandates and timelines”. This is not an accurate statement about the holding of the case.
- p. At Docket Entry 128, p. 14, the plaintiff cites to [*AvalonBay Communities, Inc. v. Plan & Zoning Commission*, 260 Conn. 232, 243 \(2002\)](#). The plaintiff states that Avalon Bay Communities holds that “trial courts possess inherent authority to design and issue conditional orders or sanctions to compel absolute compliance with their mandates.” This is not an accurate statement about the holding of the case.
3. On July 14, 2026, the defendant’s attorney sent correspondence to the plaintiff notifying the plaintiff that the defendant’s attorney suspected that the plaintiff had used artificial intelligence in her court filing. See Docket Entry 131, p. 17. The plaintiff did not respond to this portion of the correspondence.
4. On July 21, 2026, the defendant filed an objection (Docket Entry 130) to the plaintiff’s motion to vacate (Docket Entry 125) raising the issues of the plaintiff’s use of non-existent citations and the plaintiff’s citation to cases that fail to stand for the proposition that the plaintiff attributes to them.

5. On August 26, 2026, the court issued its order to show cause. Docket Entry 135.
6. On August 27, 2026, the court scheduled the hearing on the order to show cause for October 5, 2026.
7. On October 5, 2026, fifteen minutes before the hearing was scheduled to begin, the plaintiff filed a motion for continuance of the hearing. The court granted the continuance and continued the hearing until October 6, 2026. Docket Entry 139; 139.10.
8. The defendant's attorney appeared at the hearing on October 5, 2026.
9. The plaintiff failed to appear at the hearing on October 6, 2026.
10. The defendant's attorney appeared at the hearing on October 6, 2026. The defendant asked the court to consider dismissing the case as part of the sanctions.
11. On January 16, 2026, the court advised the plaintiff on the record to familiarize herself with the rules of practice.
12. On May 15, 2026, the court advised the plaintiff on the record to review the practice book.

Discussion

As our Supreme Court noted, “the judges of the Superior Court have recently adopted a new rule of practice addressing the risk that ‘generative AI can create inaccurate factual and legal information,’ and requiring that ‘any person who uses generative AI in the creation or editing of any document filed with the court ... independently verify all citations, legal authorities or evidence produced by generative AI.’” (Internal quotation marks omitted). *Tov Realty, LLC v. Suarez*, 355 Conn. 902, 908, 360 A.3d 1062, (2026); see also *Elliott v. New York Bariatric Group, LLC*, Superior Court, judicial district of Ansonia/Milford at Milford, Docket No. AANCV256066141S (August 6, 2026, *Spader, J.*).

*5 The recent changes to the Practice Book relating to artificial intelligence went into effect on June 23, 2026. Those recent changes include an amendment to [Practice Book § 4-2 \(b\)](#) and the adoption of [Practice Book § 4-9](#). [Practice Book § 4-2 \(b\)](#) was amended to provide: “The signing of any pleading, motion, objection or request shall constitute a

certificate that the signer has read such document, that to the best of the signer's knowledge, information and belief there is good ground to support it, that it is not interposed for delay, and that the signer has complied with the requirements of Section 4-7 regarding personal identifying information and [Section 4-9](#) regarding generative AI. Each pleading and every other court-filed document signed by an attorney or party shall set forth the signer's telephone number and mailing address.”

[Practice Book § 4-9](#) provides:

(a) “Generative AI” means: any machine-learning model/application that can create original content--such as text, images, video, audio or software code--in response to a prompt or request, including but not limited to, ChatGPT, Co-Counsel, Google Bard, Neeva, Harvey, Ironclad, Bing, DeepSeek, Grok, and similar technology.

(b) Due to the risk that generative AI can create inaccurate factual and legal information, including, without limitation, faulty citations to legal authority, fabricated quotations from such authority, and inaccurate or fabricated evidence, any person who uses generative AI in the creation or editing of any document filed with the court shall independently verify all citations, legal authorities or evidence produced by generative AI.

The failure to do so may result in court-imposed sanctions, including, without limitation, the entry of a nonsuit or default judgment.

(c) Any person who files documents with the court represents that they have reviewed this rule and, by filing the document, represents that they have made good faith, diligent efforts to ensure compliance with their obligations under this rule, all other rules of practice, the Rules of Professional Conduct, and any applicable provision of Connecticut law regarding the use of or reliance on generative AI.

(d) The responsibility for complying with this rule rests solely with the person filing the document. The court or the clerk of the court is not required to review any filed document for compliance with this rule.

The new Practice Book sections apply to both self-represented parties and lawyers. See *Elliott v. New York Bariatric Group, LLC*, *supra*. The court balances these new provisions of the Practice Book with its obligations regarding

self-represented parties. “[I]t is the established policy of the Connecticut courts to be solicitous of [self-represented] litigants and ... to construe the rules of practice liberally in [their] favor.” (Internal quotation marks omitted). *Idlibi v. Hartford Courant Co.*, 350 Conn. 557, 569–70, 325 A.3d 1048 (2024). “Nevertheless, [a]lthough we are solicitous of the rights of [self-represented] litigants ... [s]uch a litigant is bound by the same rules ... and procedure as those qualified to practice law.” (Internal quotation marks omitted.) *Eccleston v. City of Waterbury*, -A.3d-, 2026 WL 2819176, at *7 (September 22, 2026).

Turning to the present matter, the court identified what it believed to be improper conduct and provided the plaintiff with notice and an opportunity to be heard.¹ The plaintiff failed to appear at the show cause hearing. The plaintiff has not provided any response to the court's inquiry or the defendant's attorney's inquiry about her use of artificial intelligence. The court is aware that the Practice Book sections are fairly new however the court is troubled by the plaintiff's lack of explanation for the use of artificial intelligence. The court finds that the plaintiff violated [Practice Book § 4-2 \(b\)](#) and [Practice Book § 4-9 \(b\)](#).

Footnotes

- ¹ In researching the issues presented here, the court came across the case of *Butler v. Fidelity Management & Research Company LLC*, No. 25-CV-09337 (RA) (RFT), 2026 WL 1175334 (S.D.N.Y. April 30, 2026, Tarnofsky, J.) where Ms. Butler (the same plaintiff in the present matter) was admonished twice in federal court for submitting documents using artificial intelligence. See also *Butler v. Fidelity Management & Research Company LLC*, No. 25-CV-09337 (RA) (RFT), 2026 WL 1175334 (S.D.N.Y. May 22, 2026, Tarnofsky, J.).

*6 The court is adopting the narrowest sanction it can devise to address the conduct.

It is therefore ordered:

1. Docket Entry 125, motion to vacate and set aside, is stricken; and
2. Docket Entry 128, reply to defendant's opposition to motion for order of compliance, is stricken.

The court cautions the plaintiff that further violations of the rules of practice and the further failure to comply with court orders, including but not limited to the failure to appear for court proceedings, may result in sanctions.

So ordered.

All Citations

Not Reported in Atl. Rptr., 2026 WL 3059644