

DOCKET NO.: SC 21184 : SUPREME COURT
KOSEL EQUITY, LLC : STATE OF CONNECTICUT
V. :
MARK MACGREGOR, ET AL : FEBRUARY 19, 2026

MEMORANDUM

1.) What was the reason for the filing of the February 13, 2026 errata sheet?

Counsel for the Appellant was made aware that there were errors in the Appellant's brief and upon becoming aware of the errors, took immediate action to make such corrections.

2.) What caused the errors listed on the errata sheet?

Counsel for the Appellant failed to properly proof its citations and references were accurate during the review process.

3.) When and how did counsel first learn about the errors listed on the errata sheet?

Counsel first learned of the errors when reviewing the brief submitted by the Amici Curiae for New Haven Legal Assistance Association, Connecticut Fair Housing Center, Connecticut Veterans Legal Center, and Center for Children's Advocacy. This was reviewed during the evening of Tuesday, February 10, 2026. On Wednesday, February 11, 2026, Counsel for the Appellant contacted the Chief Clerk to self report and determine the best way for Counsel to provide the appropriate notice to the Court without disrupting the current scheduling of briefing and argument.

4.) Was generative artificial intelligence (AI) used in the preparation of the plaintiff appellant's brief filed on January 9, 2026, and if so, which AI platform was used, and to what extent was it used in preparing the brief?

Yes. Counsel for the Appellant used Lexis for the legal research in the drafting of the brief. After the initial brief was drafted, Counsel used ChatGPT to assist in the organization and formatting of the content of the brief. This assisted with analyzing the brief to avoid duplication of arguments. After the initial drafting, I used AI to further assist with the organization, formatting and refinement of the brief, in particular, to assist with compliance with word count restrictions. It was not used as a substitute for legal research or an alternative to Counsel's own work product.

5.) If AI was used in the preparation of the plaintiff appellant's brief, what steps, if any, were taken to verify the accuracy of the content generated by the use of AI in the brief?

Any assertions, record references, and citations were reviewed by Counsel through review of the cited authorities and the record, with research conducted

through Lexis and source documents. AI was used to assist in the organization and formatting of the brief, specifically with analyzing the brief to avoid duplication of arguments. AI was also used to assist in reviewing the content of the brief in particular to comply with the word count restrictions. The errors identified in the errata sheet were corrected by manually checking the brief's quotations and formatting against the underlying sources. Unfortunately, Counsel did not notice that AI had intuitively made changes to the brief prior to filing. After having been alerted to the issues associated with using AI, including those that were corrected through the errata sheet, Counsel has implemented additional pre-filing procedures focusing on citations and quotations as well as case citations to ensure that this does not happen again, including a review process that includes more than one attorney in our office reviewing such briefs. Counsel takes this situation very seriously and deeply regrets that these errors occurred and for any inconvenience to the Court and all Counsel. Counsel has notified his client of the issues that have arisen and acknowledges that this series of events has been professionally embarrassing. Counsel takes full responsibility for these errors and recognizes that they fell short of the standards expected in this Court as well as in the legal community, but wishes to make clear that this was in no way intended to willfully violate any ethical obligation that Counsel has to the Court. Counsel wishes to assure the Court that this is not an error that will happen again.

Respectfully submitted,

THE PLAINTIFF / APPELLANT

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CERTIFICATION

This is to certify that a copy of this document was or will be immediately be mailed or delivered electronically or non-electronically on February 19, 2026, to all attorneys and self-represented parties of record and that written consent for electronic delivery was received from all attorneys and self-represented parties of record who received or will immediately be receiving electronic delivery. The name and address of each party and attorney that a copy was or will immediately be mailed or delivered to are as follows:

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Commissioner of the Superior Court