

4 Thank you.

5 THE COURT: Thank you, Mr. Moon.

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1 Mr. Van Horn.

2 MR. VAN HORN: Your Honor, before I address
3 the motion, I want to briefly address the notice of
4 correction that was filed.

5 The citation errors in the response should
6 never have happened, and in almost two decades, in
7 practicing in this courtroom, it's never happened. Once
8 the issue was raised, I reviewed the authorities,
9 corrected the record, withdrew the affected citations, and
10 clarified the authorities that remain.

11 THE COURT: Was it an AI hallucination,
12 Mr. Van Horn?

13 MR. VAN HORN: Your Honor, I did a deep
14 dive. The short answer is yes. I want to answer directly
15 with your Honor.

16 The way it came to be is we have three
17 levels of review to ensure that this does not happen.
18 Clearly -- and that's attorney, individual attorney
19 review. Clearly that didn't happen appropriately here,
20 and we have to own that, and I never thought that my firm
21 would do that, because we were very clear, and this has to
22 be followed and, unfortunately, there's going to be
23 changes made in staff, and now we're doing a fourth-level
24 review, especially now I'm doing the review.

25 I need to treat even my associates, when