

Responsible Legal Augmentation: Integrating Generative AI into Legal Practice

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Abstract

This article examines *Ayinde v London Borough of Haringey; Al-Haroun v Qatar National Bank* [2025] EWHC 1383 (Admin), a landmark High Court judgment addressing the use of generative artificial intelligence (GenAI) in legal practice. The case arose when counsels submitted fictitious AI-generated authorities, prompting the court to consider not only individual lapses but also the broader professional obligations that must govern technological adoption in legal practice. Rejecting prohibition as well as uncritical endorsement, the court articulated a model of responsible augmentation: AI may assist lawyers, but only where outputs are independently verified and presented without misleading the judiciary. The judgment is significant in reaffirming lawyers' professional duties of honesty, integrity and competence, while extending them to encompass technological literacy. It further underscores that legal practice cannot be reduced to linguistic plausibility alone, but must remain grounded in institutional practices of authority, authenticity and accountability. The decision also carries far-reaching implications for legal education as it highlights the urgency of embedding AI literacy into curricula, not merely as technical training but as critical engagement with law's epistemic foundations. By reasserting that authenticity and accountability are core professional values, *Ayinde* signals a jurisprudential transition from tentative accommodation of technological change to its active governance. In doing so, it provides a framework through which courts, regulators and educators can collaborate to integrate GenAI into legal practice while sustaining public trust in the judicial system.

Keywords: Generative artificial intelligence; authenticity; accountability; legal profession; legal education; professional ethics; technology regulation.

1. Introduction

The proliferation of generative artificial intelligence (GenAI) across professional domains has created significant opportunities for efficiency, alongside growing concerns regarding accuracy, reliability and transparency. In the legal sector, the advent of large language models (LLMs) such as ChatGPT, DeepSeek, Copilot, Gemini and Claude has produced both unprecedented possibilities and acute challenges for practitioners and the administration of justice. These tools are already integrated into mainstream legal research platforms such as LexisNexis and Westlaw, promising rapid access to sources and streamlined drafting. However, their propensity to generate 'hallucinated' content raises profound questions about professional responsibility and the integrity of adjudicative processes.

The judgment of the High Court in *Ayinde v London Borough of Haringey; Al-Haroun v Qatar National Bank*¹ is a landmark decision that directly engages with these emergent opportunities and challenges. This judgment highlighted both the benefits and pitfalls of relying on AI-generated content by legal professionals within the adjudicative process. Significantly, while the judgment did not disapprove of the use of GenAI for legal practice, as AI sceptics might have anticipated, nor did it provide unqualified endorsement for AI enthusiasts. Instead, the court struck a measured balance by issuing guidance regarding the

¹ [2025] EWHC 1383 (Admin).



deployment of GenAI by legal professionals, emphasising their duties to ensure the accuracy, authenticity and transparency of all materials presented to courts.

The proceedings were conducted under the court's inherent jurisdiction to regulate its own procedures and enforce the duties that lawyers owe to the court, as established in *R (Hamid) v Secretary of State for the Home Department*.² The judgment specifically addressed the problematic use of fictitious case law generated by AI tools by legal practitioners, including a barrister, a paralegal and solicitors. The court laid down guidelines for legal professionals when utilising GenAI for legal research and drafting.

In this article, I argue that *Ayinde* marks a jurisprudential shift in the legal profession's engagement with GenAI. The decision reframes the debate from whether GenAI should be permitted at all to how it should be used. At its core, the judgment establishes a model of *responsible legal augmentation*. GenAI may be employed to enhance efficiency and access, but never at the expense of the law's foundational values of honesty, integrity and authenticity. By rejecting both prohibition and uncritical enthusiasm, the court articulated a middle path requiring courts and regulators to share responsibility for integrating GenAI into legal practice. The significance of *Ayinde* thus does not lie merely in sanctioning professional lapses. It lays down a framework through which technological innovation may be integrated into judicial practice, guided by professional duties that safeguard public trust in the law and the administration of justice. This approach aligns with contemporary scholarship that emphasises augmentation over substitution of lawyers,³ and highlights the need for regulatory frameworks that manage risk while enabling innovation.⁴ It further reflects wider debates about whether large language models (LLMs) can meaningfully 'apply the law' or must remain subject to human oversight as part of a collective practice of legal reasoning.⁵

The analysis is structured in six sections. It begins with the factual background of the case before situating *Ayinde* within comparative legal developments on the use of GenAI in legal practice. It then considers the professional duties of honesty, integrity and competence as reframed by the judgment before turning to the implications for professional practice and legal education. The discussion next situates the decision within jurisprudential debates on authority, authenticity and the epistemology of law. The conclusion synthesises these insights, contending that *Ayinde* exemplifies a transition from tentative accommodation to structured integration. It demonstrates that GenAI can enhance the efficiency of legal professionals and support legal practice while remaining anchored in the core duties of honesty, integrity and accountability.

2. Factual Context and Procedural Background

The High Court consolidated two cases: *Ayinde* and *Al-Haroun*. In *Ayinde*, a judicial review was brought against the London Borough of Haringey concerning interim accommodation for a homeless claimant. The grounds of claim, drafted and signed by pupil barrister Sarah Forey, contained five fabricated authorities, including *R (El Gendi) v Camden LBC*, which is a made-up name and the citation reference ([2020] EWHC 2435 (Admin)) is to a different case: *R (Preservation and Promotion of the Arts Ltd) v Greater Manchester Magistrates' Court*, a case regarding a charity's liability to pay business rates case.⁶ Four further cited cases – *Ibrahim v Waltham Forest LBC*; *R (on the application of H v Ealing LBC)*; *R (on the application of KN v Barnet LBC)*; and *R (on the application of Balogun v Lambeth LBC)* – also did not exist.⁷ The pleading was noted for its 'formulaic style' and the Americanised spelling 'emphasized', features that raised suspicions about GenAI use.⁸

² [2012] EWHC 3070 (Admin); [2013] CP Rep 6. In England and Wales, the courts operate within a hierarchical structure headed by the Supreme Court. Below it sits the Court of Appeal, divided into Civil and Criminal Divisions, and then the High Court, which deals with complex or high-value cases. Beneath these are the Crown Court, County Courts, and Magistrates' Courts, which handle the bulk of criminal and civil matters. Alongside the courts, the legal profession is regulated primarily by the Solicitors Regulation Authority (for solicitors) and the Bar Standards Board (for barristers), ensuring compliance with professional and ethical duties.

³ Armour, "Augmented Lawyering," 71.

⁴ Law Commission of England and Wales, *AI and the Law*.

⁵ Marcos, "Can Large Language Models Apply the Law?" 3605. Burgess, "Using Generative AI to Identify Arguments in Judges' Reasons," 18–19.

⁶ *Ayinde v Haringey*; *Al-Haroun v Qatar National Bank* [2025] EWHC 1383 (Admin), at [35–36]. The invented case citations were *Ibrahim v Waltham Forest LBC* [2019] EWHC 1873 (Admin); *R (on the application of H v Ealing LBC)* [2021] EWHC 939 (Admin); *R (on the application of KN v Barnet LBC)* [2020] EWHC 1066 (Admin); and *R (on the application of Balogun v Lambeth LBC)* [2020] EWCA Civ 1442.

⁷ *Ayinde v Haringey*; *Al-Haroun v Qatar National Bank*, at [37–38].

⁸ *Ayinde v Haringey*; *Al-Haroun v Qatar National Bank*, at [38].

When opposing solicitors queried the cases, Ms Forey gave inconsistent explanations, including reference to a ‘box of copies of cases’⁹ and later to Google searches that may have included AI-generated summaries.¹⁰ Ritchie J, in a wasted costs application, rejected her account as implausible, holding that she had ‘intentionally put these cases into her statement of facts and grounds, not caring whether they existed or not’.¹¹ Both Ms Forey and Haringey Law Centre were ordered to pay wasted costs of £2000 each and referred to their regulators.¹²

In *Al-Haroun*, the claimant, Hamad Al-Haroun, pursued a £89.4 million commercial claim against Qatar National Bank. His witness statement cited 45 authorities, 18 of which were fictitious.¹³ For many genuine authorities, the quoted passages were either fabricated or irrelevant.¹⁴ Mr Al-Haroun admitted that the references had been produced using AI tools and apologised unreservedly, emphasising that he had no intention of misleading the court.¹⁵ His solicitor, Mr Abid Hussain of Primus Solicitors, also apologised, admitting that he had relied on his client’s AI-assisted research without verification.¹⁶ He self-referred to the Solicitors Regulation Authority. The judges of the High Court described this as a ‘lamentable failure to comply with the basic requirement to check the accuracy of material that is put before the court’.¹⁷

3. The Role of GenAI in Legal Research

At the outset of the judgment, the court acknowledged that GenAI is ‘a powerful technology’ with ‘a continuing and important role in the conduct of litigation in the future’.¹⁸ However, it stressed that its use must occur ‘with an appropriate degree of oversight’ and ‘within a regulatory framework that ensures compliance with well-established professional and ethical standards if public confidence in the administration of justice is to be maintained’.¹⁹ The court warned that LLMs may generate text that appears coherent but is factually incorrect, a phenomenon commonly described as ‘hallucination’. As Dame Victoria Sharp P observed:

Freely available generative artificial intelligence tools, trained on a large language model such as ChatGPT are not capable of conducting reliable legal research. Such tools can produce apparently coherent and plausible responses to prompts, but those coherent and plausible responses may turn out to be entirely incorrect. The responses may make confident assertions that are simply untrue. They may cite sources that do not exist. They may purport to quote passages from a genuine source that do not appear in that source.²⁰

The appendix to the judgment collated examples of AI-generated false citations presented in litigation across England and Wales, the United States, Australia, New Zealand and Canada.²¹ One such example was *Zzaman v Commissioners for His Majesty’s Revenue and Customs*,²² where a self-represented litigant used AI to draft submissions. Although the document cited several genuine cases, none supported the propositions advanced. The Tribunal observed that AI can produce plausible but inaccurate responses and that there is ‘no reliable way to stop this’.²³ It suggested that risk-reduction measures, including using clear prompts, asking for citations of specific paragraphs, checking whether the tool has access to live data, instructing it not to answer when uncertain and requesting disclosure of weaknesses in the argument. Sharp J, however, cautioned that these measures were insufficient:

We agree with the Tribunal as to the dangers and the need for caution. We do not, however, consider that the risks are materially reduced by ‘asking the tool not to provide an answer if it is not sure and asking the tool for information on the shortcomings of the case being advanced.’ The critical safeguard is to check any output by reference to an authoritative source.²⁴

⁹ *Ayinde v Haringey; Al-Haroun v Qatar National Bank*, at [52].

¹⁰ *Ayinde v Haringey; Al-Haroun v Qatar National Bank*, at [57].

¹¹ *Ayinde v Haringey* [2025] EWHC 1040 (Admin) at [53], [65].

¹² *Ayinde v Haringey*, at [72]; see also *Ayinde v Haringey; Al-Haroun v Qatar National Bank* [2025] EWHC 1383 (Admin), at [69-70].

¹³ *Ayinde v Haringey; Al-Haroun v Qatar National Bank* [2025] EWHC 1383 (Admin), at [74].

¹⁴ *Ayinde v Haringey; Al-Haroun v Qatar National Bank*, at [67].

¹⁵ *Ayinde v Haringey; Al-Haroun v Qatar National Bank*, at [76].

¹⁶ *Ayinde v Haringey; Al-Haroun v Qatar National Bank*, at [77].

¹⁷ *Ayinde v Haringey; Al-Haroun v Qatar National Bank*, at [81].

¹⁸ *Ayinde v Haringey; Al-Haroun v Qatar National Bank*, [4].

¹⁹ *Ayinde v Haringey; Al-Haroun v Qatar National Bank*, [5].

²⁰ *Ayinde v Haringey; Al-Haroun v Qatar National Bank*, [7].

²¹ *Ayinde v Haringey; Al-Haroun v Qatar National Bank*, Appendix, at [83].

²² [2025] UKFTT 00539 (TC).

²³ *Ayinde v Haringey; Al-Haroun v Qatar National Bank*, at [86].

²⁴ *Ayinde v Haringey; Al-Haroun v Qatar National Bank*, at [87].

The court also summarised the judgment in the widely reported case of *Mata v Avianca Inc*²⁵ in the United States, in which the opposing lawyer and the court were unable to find seven cited cases. When ordered to produce them, the lawyer filed ChatGPT-generated summaries instead of locating the actual decisions. The court found the summaries flawed and uncharacteristic of genuine judgments.

4. Professional Duties of Lawyers in the Age of GenAI

A central theme of the judgment is the reaffirmation of ethical duties in the face of technological advancements. Both barristers and solicitors are subject to regulatory frameworks that impose duties of honesty, integrity, and competence.²⁶ Further professional duties include:

- *Duty to the court*: Legal professionals must ensure that all material submitted is accurate and not misleading²⁷
- *Duty of verification*: Professionals cannot rely on external tools or individuals (including clients or AI systems) without conducting independent checks²⁸
- *Duty to supervise*: Senior lawyers and supervisors are responsible for ensuring junior colleagues or pupils are adequately trained and monitored.²⁹

The court categorically rejected the argument that the legal principles cited were sound, regardless of the citation's authenticity. As it noted, citations are not merely decorative or ornamental: they are foundational to legal reasoning and judicial trust.³⁰ The court strongly rejected Ms Forey's defence, in which she drew an analogy of fabricated citations with the 'mislabelling of a tin where the tin, in fact, contains the correct product'.³¹

The appendix to the judgment referred to *Bandla v Solicitors Regulation Authority*,³² where a solicitor appealed against a decision of the Solicitors Disciplinary Tribunal to strike him off the roll of solicitors. The appellant cited 25 cases which did not exist, but he denied that he had used artificial intelligence. Fordham J rejected the claim that the "substance" of the points could stand despite fabricated authorities, holding:

He claimed that the substance of the points which were being put forward in the grounds of appeal were sound, even if the authority which was being cited for those points did not exist. He was saying, on that basis, that the citation of non-existent (fake) authorities would not be a sufficient basis to concern the Court, at least to the extent of taking that course. I was wholly unpersuaded by that answer. In my judgment, the Court needs to take decisive action to protect the integrity of its processes against any citation of fake authority.³³

In *Ayinde*, the court considered the specific circumstances of the case. It noted that Ms Forey was 'an extremely junior lawyer who was operating outside of her level of competence' and had already been referred to the regulator for further investigation.³⁴ On that basis, the court decided not to initiate contempt proceedings. Nonetheless, it issued a clear warning that:

our overarching concern is to ensure that lawyers clearly understand the consequences (if they did not before) of using artificial intelligence for legal research without checking that research by reference to authoritative sources. This court's decision not to initiate contempt proceedings in respect of Ms Forey is not a precedent. Lawyers who do not comply with their professional obligations in this respect risk severe sanction.³⁵

Finally, the court highlighted the judicial powers to ensure that professional duties are appropriately fulfilled:

The court has a range of powers to ensure that lawyers comply with their duties to the court. Where those duties are not complied with, the court's powers include public admonition of the lawyer, the imposition of a costs order, the imposition

²⁵ No 22-cv-1461 (PKC) (SDNY, 22 June 2023).

²⁶ *Ayinde v Haringey; Al-Haroun v Qatar National Bank*, at [17-22].

²⁷ *Ayinde v Haringey; Al-Haroun v Qatar National Bank*, at [18-19].

²⁸ *Ayinde v Haringey; Al-Haroun v Qatar National Bank*, at [7-8].

²⁹ *Ayinde v Haringey; Al-Haroun v Qatar National Bank*, at [21-22].

³⁰ *Ayinde v Haringey; Al-Haroun v Qatar National Bank*, at [67].

³¹ *Ayinde v Haringey; Al-Haroun v Qatar National Bank*, at [67].

³² [2025] EWHC 1167 (Admin),

³³ *Bandla v Solicitors Regulation Authority* [2025] EWHC 1167 (Admin), para [53].

³⁴ *Ayinde v Haringey; Al-Haroun v Qatar National Bank* [2025] EWHC 1383 (Admin), at [69].

³⁵ *Ayinde v Haringey; Al-Haroun v Qatar National Bank*, at [69].

of a wasted costs order, striking out a case, referral to a regulator, the initiation of contempt proceedings, and referral to the police.³⁶

5. GenAI in Legal Practice

The judgment in *Ayinde* has far-reaching implications for the regulation of the use of GenAI in legal practice. Notably, the court refrained from recommending prohibition or blanket restriction of AI tools for legal practitioners. Instead, it articulated the guidelines for a governance framework built around three interlocking principles:

1. *Mandatory verification protocols*: AI-generated content must be independently verified against authoritative primary sources before being presented in court.³⁷
2. *Training requirements*: legal professionals must develop competence in understanding both the capabilities and limitations of AI systems, reflecting the growing consensus that AI literacy constitutes an essential professional skill.³⁸
3. *Accountability mechanisms*: responsibility for any AI-generated output rests ultimately with the lawyer who submits it, ensuring that ethical and professional obligations remain non-delegable.³⁹

These principles align with emergent regulatory trends across other jurisdictions. The European Union's AI Act 2024 establishes obligations of transparency, oversight and risk management in high-risk applications, including those on the administration of justice.⁴⁰ Similarly, the American Bar Association's Formal Opinion emphasises the need for accuracy, confidentiality, and supervision in AI-assisted work. It also reminds lawyers that they 'have a duty of competence, including maintaining relevant technological competence, which requires an understanding of the evolving nature of GAI [generative AI]'.⁴¹ What distinguishes the English approach, however, is its embedding within judicial precedent rather than professional codes or statutory instruments. By situating these obligations within the court's inherent jurisdiction to regulate proceedings, the decision ensures enforceability through adjudication and extends regulatory authority beyond self-regulation by the legal profession.

While there is a growing convergence across jurisdictions in addressing the risks of GenAI in legal practice – seen in cases such as *Mata v Avianca* in the United States – the English approach is shaped by a distinctive institutional and doctrinal framework. In England and Wales, judicial oversight of professional conduct has historically developed through precedent, particularly under the *Hamid* jurisdiction, which empowers the High Court to directly scrutinise solicitors' and barristers' duties of candour and responsibility to the court.⁴² This contrasts with other jurisdictions, where regulatory responses are more often mediated through statutory codes or professional guidance issued by bar associations. Crucially, the *Hamid* procedure allows judges to impose immediate directions on practitioners within ongoing proceedings, rather than leaving misconduct to be addressed later by professional disciplinary bodies. The significance of *Ayinde* lies in its integration of concerns about AI-generated errors into this pre-existing line of judicial authority. It reaffirms the courts' supervisory role as a primary site for enforcing professional responsibility. Importantly, this judicially driven framework now operates alongside professional guidance such as the Law Society's *Generative AI: The Essentials*, which highlights solicitors' continuing obligations to verify the accuracy of AI-assisted work, safeguard client confidentiality and manage risks around data protection, intellectual property and output integrity.⁴³ In this sense, the English approach is not merely parallel to developments elsewhere; it continues a long-standing tradition in which judicial precedent functions as a central regulatory mechanism.

The judgment also reaffirms that legitimacy in law derives not only from substantive outcomes but also from the transparency and integrity of legal processes. Rejecting the analogy advanced by counsel that the citation errors were akin to 'mislabelled tins' still containing the correct product, the court insisted that legal citation serves a performative rather than ornamental function.⁴⁴ The authority of law depends not just on the correctness of the conclusion, but on the authenticity and integrity of its processes of reasoning. As GenAI rapidly becomes integrated into professional workflows, safeguarding the accuracy, authenticity and reliability of legal sources is increasingly important.

³⁶ *Ayinde v Haringey; Al-Haroun v Qatar National Bank*, at [23].

³⁷ *Ayinde v Haringey; Al-Haroun v Qatar National Bank*, at [7] and [69].

³⁸ *Ayinde v Haringey; Al-Haroun v Qatar National Bank*, at [9].

³⁹ *Ayinde v Haringey; Al-Haroun v Qatar National Bank*, at [69].

⁴⁰ European Union, Artificial Intelligence Act, Regulation (EU) 2024/1689, OJ L 202, 12 July 2024.

⁴¹ American Bar Association, Formal Opinion 512 (2024) on Lawyers' Use of Generative AI.

⁴² *R (Hamid) v Secretary of State for the Home Department* [2012] EWHC 3070 (Admin).

⁴³ Law Society of England and Wales, *Generative AI: The Essentials* (September 2025).

⁴⁴ *Ayinde v Haringey; Al-Haroun v Qatar National Bank* [2025] EWHC 1383 (Admin), at [67].

The integration of GenAI into the legal profession is a significant development, which presents a complex interplay of transformative potential and formidable challenges to the epistemological and normative foundations of law. Recent scholarship highlights that, despite their efficacy in augmenting legal research and drafting, LLMs remain prone to hallucination, whereby these models produce ostensibly authoritative but fictitious sources.⁴⁵ This limitation is not merely operational, but structural. Legal reasoning requires contextual interpretation, normative judgment and analogical reasoning – forms of cognition that current GenAI systems, grounded in statistical text prediction, are unable to replicate.⁴⁶ The judgment in *Ayinde* affirms that legal practice cannot be equated with the production of linguistically plausible outputs. It must instead remain embedded within institutional practices of authority, verification and accountability that confer authenticity on legal reasoning and sustain the epistemic integrity of law.

The incorporation of AI into both legal practice and legal education therefore demands a reconceptualisation of professional competence. Emerging scholarship emphasises the necessity of ‘AI literacy’ as a foundational competency, encompassing not only technical facility but also critical awareness of the epistemic implications of these technologies.⁴⁷ This entails the cultivation of hybrid professional skills, enabling practitioners to employ the efficiencies of GenAI models while upholding the enduring standards of doctrinal coherence, evidential integrity and professional responsibility.⁴⁸ In this regard, the judgment in *Ayinde* reinforces socio-legal understandings of law as a practice constituted through authority, traceability and institutional legitimacy. The uncritical delegation of these functions to computational systems would imperil the very foundations upon which the legitimacy of law depends.

The Law Commission of England and Wales’ recent Discussion Paper, *AI and the Law*, published after the judgment in *Ayinde*, underscores the wider implications of *Ayinde* for the integration of GenAI in legal practice.⁴⁹ Rather than treating AI as an existential threat, the Commission emphasises the need to embed safeguards around autonomy, opacity and accountability, recognising that unresolved questions of verification and liability risk undermining trust in legal processes.⁵⁰ Its analysis highlights that AI outputs must remain subject to human supervision and cross-checking against authoritative sources, echoing the court’s rejection in *Ayinde* of analogies that trivialised citation errors.⁵¹ The Commission’s focus on oversight and training is also consonant with the growing body of scholarship stressing the urgency of developing AI literacy within the profession and in legal education, so future lawyers are equipped to evaluate and responsibly deploy GenAI.⁵² Thus, the *Ayinde* judgment may be read as an early judicial contribution to the governance framework that the Law Commission identifies as essential for the responsible integration of GenAI into legal practice.

6. GenAI in Legal Education

The implications of *Ayinde* extend beyond professional regulation into the domain of legal education. The judgment’s emphasis on verification, authenticity and accountability underscores the skills that law schools must now embed into their curricula. These skills are essential if graduates are to succeed in an AI-augmented professional environment. Recent empirical research highlights both the opportunities and risks of GenAI in education. In a randomised controlled trial, Choi et al. found that AI assistance consistently reduced the time taken by law students to complete drafting and analytical tasks. It also modestly improved quality, with the greatest gains observed among less-skilled participants.⁵³ This suggests that GenAI may function as an equaliser in a profession marked by disparities in experience and resources.

The implications for practice are twofold. First, GenAI is already embedded in mainstream platforms such as Lexis+AI, Westlaw Precision and Casetext Co-Counsel, which promise hyperlinked and verifiable legal research outputs. Second, the debate has shifted – from whether lawyers should use GenAI to how they can do so responsibly. As Ajevski and colleagues argue, the challenge for educators and practitioners lies in designing assessments, regulatory frameworks and professional standards that both harness GenAI’s efficiency and guard against its risks, such as hallucinations, bias and over-reliance.⁵⁴ This

⁴⁵ Magesh, “Hallucination-Free?” 216. Dahl, “Large Legal Fictions,” 64. Villasenor, “Generative Artificial Intelligence,” 25. Wu, “No Free Lunch.”

⁴⁶ Marcos “Can Large Language Models Apply the Law?” 3605.

⁴⁷ Bliss, “Teaching Law in the Age of Generative AI,” 111. Armour, “Augmented Lawyering,” 71.

⁴⁸ Surden, “ChatGPT, Artificial Intelligence (AI) Large Language Models, and Law,” 24.

⁴⁹ Law Commission of England and Wales, *AI and the Law*.

⁵⁰ Law Commission of England and Wales, *AI and the Law*.

⁵¹ Law Commission of England and Wales, *AI and the Law*.

⁵² Bliss, “Teaching Law in the Age of Generative AI,” 111; Ajevski, “ChatGPT and the Future of Legal Education and Practice”.

⁵³ Choi, “ChatGPT Goes to Law School,” 387.

⁵⁴ Ajevski, “ChatGPT and the Future of Legal Education and Practice,” 352.

emerging scholarship suggests that GenAI should not be understood as a replacement for lawyers but as a collaborator that requires verification, critical engagement and new forms of professional literacy.

In a complementary judicial contribution, the Master of the Rolls, Sir Geoffrey Vos, has identified three compelling reasons for lawyers and judges to adopt GenAI.⁵⁵ First, AI is already being widely deployed in sectors served by the legal profession, making its understanding and integration essential. Second, many future disputes will concern AI – ranging from negligent use to deliberate non-use – so lawyers must be ‘adept at understanding the capabilities and weaknesses of generative AI’ to advise clients effectively. Third, AI can reduce cost, time and effort, enabling more efficient dispute resolution through innovations such as the Digital Justice System.⁵⁶ This triad of reasons aligns with the broader scholarly consensus that GenAI should collaborate with lawyers rather than replace them. It also reinforces the need for verification, authentication and critical evaluation. As Vos observed, it is vital to ‘build bridges’ between AI sceptics and AI enthusiasts, since adoption by the legal profession is inevitable, though it must proceed cautiously and with due responsibility.⁵⁷

As Choi and colleagues emphasise, law schools, judges and law firms must proactively plan for a future in which GenAI is a ubiquitous tool of legal practice.⁵⁸ For education, this underscores that AI literacy must be understood expansively: not merely as technological competence, but as the ability to understand the capabilities and weaknesses of GenAI, to deploy it responsibly, and to critically assess its epistemic limits.

Beyond its doctrinal findings, *Ayinde* raises broader jurisprudential questions about the nature of legal authority in the age of GenAI. Legal reasoning depends not only on the substantive correctness of outcomes, but also on the traceability of sources. Citation performs a constitutive function: it anchors argumentation within the authoritative frameworks of statutes, precedents and legal texts. GenAI unsettles this dynamic because its outputs often mimic the style of legal authority without providing the underlying epistemic traceability. Hallucinated judgments or misattributed dicta are not merely formal errors; they undermine the performative foundation of law by producing contents that appear authoritative, but lack institutional grounding. The Court in *Ayinde* implicitly recognised this distinction when it rejected arguments that the substantive correctness of submissions could outweigh fabricated citations. By insisting that fictitious authorities are inherently unacceptable, the judgment reaffirmed that the authority of law depends as much on how decisions are justified as on the outcomes they reach.

7. Conclusion

The judgment in *Ayinde* is not merely a rebuke of professional lapses; it represents a foundational intervention in how the legal profession responds to the challenges of GenAI. By insisting that lawyers cannot rely on GenAI without independent verification and authentication of legal sources, the court reaffirmed that professional duties of honesty, integrity and competence remain essential in the GenAI era. Yet the judgment also reminded legal professionals that law’s authority rests not only on the correctness of its outcomes but on the authenticity, traceability and integrity of the sources of its reasoning. The insistence on verifiable citation is not a pedantic concern with formality, but a defence of law’s epistemic infrastructure.

The broader regulatory landscape reflects parallel but distinct approaches. The EU AI Act 2024 establishes binding statutory safeguards through risk-based regulation. The American Bar Association’s Formal Opinion 512 (2024) adopts a self-regulatory model that emphasises professional accountability for GenAI use. The *Ayinde* judgment demonstrates a third approach, in which English courts embed normative expectations within case law itself. The coexistence of these models shows that the governance of GenAI in law is not only a matter of technical regulation, but also one of institutional design, professional conduct and judicial oversight. In this respect, the judgment resonates in the Law Commission of England and Wales’ *AI and the Law*, which emphasises that legal frameworks must respond to AI’s opacity and potential harms by embedding oversight, verification and accountability into professional practice.

The implications of the judgment for legal education are equally significant. As recent studies note, AI literacy must go beyond functional training in tool use to cultivate critical awareness of law’s epistemic foundations. Since GenAI models frequently produce plausible but untraceable outputs, students must be equipped to interrogate sources, verify authenticity and understand why citation is constitutive of legal reasoning. In this regard, the judgment aligns with emerging pedagogical calls to integrate GenAI into curricula not as a shortcut but as an object of critical engagement. This approach prepares students to collaborate responsibly with technology while upholding professional values.

⁵⁵ Vos, Speech.

⁵⁶ Vos, Speech.

⁵⁷ Vos, Speech.

⁵⁸ Choi, “Lawyering in the Age of Artificial Intelligence,” 147.

In essence, *Ayinde* marks a shift from reluctant accommodation of technological advancement to active governance. It calls upon courts, regulators and educators to collaborate in sustaining public trust in the law and the administration of justice. GenAI can and should be embraced, but only within frameworks that preserve the profession's enduring values of honesty, integrity and accountability. The significance of *Ayinde* extends well beyond England and Wales, with its reasoning poised to shape how jurisdictions worldwide approach generative AI regulation in legal practice. The judgment's tripartite framework – verification, supervision and accountability – offers readily adaptable principles for common law systems such as Australia, Canada and Singapore, where AI-assisted advocacy is already generating professional and judicial scrutiny. Similarly, civil law jurisdictions and legal education institutions throughout Europe and Asia may find in *Ayinde* a compelling illustration of how traditional doctrinal principles and judicial oversight can effectively guide technological governance without compromising the foundational legitimacy of legal reasoning. The model of responsible augmentation emerging from this decision therefore possesses transnational relevance, providing a normative template for reconciling technological innovation with enduring ethical obligations.

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