



United States Bankruptcy Court
Middle District of Florida
Bryan Simpson United States Courthouse
300 North Hogan Street
Jacksonville, Florida 32202

MEMORANDUM

To: Parties Appearing in Cases Assigned to Judge Jacob A. Brown

From: Jacob A. Brown, United States Bankruptcy Judge

Subject: Warning Regarding Use of Generative Artificial Intelligence (AI)

Date: September 16, 2026

Due to the increasing usage of Generative AI, the Court wishes to remind those coming before the Court that although Generative AI is a tool that attorneys and unrepresented parties may benefit from, it is not a substitute for careful attention to the accuracy of the content of papers filed with the Court. The signer must independently verify the accuracy of everything submitted to the Court.

Federal Rule of Bankruptcy Procedure 9011 applies to represented and unrepresented parties alike. Under Rule 9011, by signing a paper filed with the Court, the signer certifies that (among other things) all citations within the paper filed with the Court are accurate. Failure to comply with this certification may result in the imposition of sanctions as the Court may deem proper after providing the signer notice and an opportunity to be heard. The full text of Fed. R. Bankr. P. 9011 is copied below for ease of reference.

Rule 9011. Signing Documents; Representations to the Court; Sanctions; Verifying and Providing Copies

(a) Signature. Every petition, pleading, written motion, and other document—except a list, schedule, or statement, or an amendment to one of them—must be signed by at

least one attorney of record in the attorney's individual name. A party not represented by an attorney must sign all documents. Each document must state the signer's address and telephone number, if any. The court must strike an unsigned document unless the omission is promptly corrected after being called to the attorney's or party's attention.

(b) Representations to the Court. By presenting to the court a petition, pleading, written motion, or other document—whether by signing, filing, submitting, or later advocating it—an attorney or unrepresented party certifies that, to the best of the person's knowledge, information, and belief formed after an inquiry reasonable under the circumstances:

(1) it is not presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase litigation costs;

(2) the claims, defenses, and other legal contentions are warranted by existing law or by a nonfrivolous argument to extend, modify, or reverse existing law, or to establish new law;

(3) the allegations and factual contentions have evidentiary support—or if specifically so identified, are likely to have evidentiary support after a reasonable opportunity for further investigation or discovery; and

(4) the denials of factual contentions are warranted on the evidence—or if specifically so identified, are reasonably based on a lack of information or belief.

(c) Sanctions.

(1) ***In General.*** If, after notice and a reasonable opportunity to respond, the court determines that (b) has been violated, the court may, subject to the conditions in this subdivision (c), impose an appropriate sanction on any attorney, law firm, or party that committed the violation or is responsible for it. Absent exceptional circumstances, a law firm must be held jointly responsible for a violation committed by its partner, associate, or employee.

(2) *By Motion.*

(A) ***In General.*** A motion for sanctions must be made separately from any other motion or request, describe the specific conduct alleged to violate (b), and be served under Rule 7004.

(B) ***When to File.*** The motion for sanctions must not be filed or presented to the court if the challenged document, claim, defense, contention, allegation, or denial is

withdrawn or appropriately corrected within 21 days after the motion was served (or within another period as the court may order). This limitation does not apply if the conduct alleged is filing a petition in violation of (b).

(C) *Awarding Damages*. If warranted, the court may award to the prevailing party the reasonable expenses and attorney's fees incurred in presenting or opposing the motion.

(3) *By the Court*. On its own, the court may enter an order describing the specific conduct that appears to violate (b) and directing an attorney, law firm, or party to show cause why it has not violated (b).

(4) *Nature of a Sanction; Limitations*.

(A) *In General*. A sanction imposed under this rule must be limited to what suffices to deter repetition of the conduct or deter comparable conduct by others similarly situated. The sanction may include:

(i) a nonmonetary directive;

(ii) an order to pay a penalty into court; or

(iii) if imposed on motion and warranted for effective deterrence, an order directing payment to the movant of all or part of the reasonable attorney's fees and other expenses directly resulting from the violation.

(B) *Limitations on a Monetary Sanction*. The court must not impose a monetary sanction:

(i) against a represented party for violating (b)(2); or

(ii) on its own, unless it issued the show-cause order under (c)(3) before voluntary dismissal or settlement of the claims made by or against the party that is, or whose attorneys are, to be sanctioned.

(5) *Content of a Court Order*. An order imposing a sanction must describe the sanctioned conduct and explain the basis for the sanction.

(d) Inapplicability to Discovery. Subdivisions (a)–(c) do not apply to disclosures and discovery requests, responses, objections, and motions that are subject to Rules 7026–7037.

(e) Verifying a Document. A document filed in a bankruptcy case need not be verified unless these rules provide otherwise. When these rules require verification, an unsworn declaration under 28 U.S.C. § 1746 suffices.

(f) Copies of Signed or Verified Documents. When these rules require copies of a signed or verified document, if the original is signed or verified, a copy that conforms to the original suffices.