



## **CASE ALERT**

### **New Case Explains Self-Represented Litigants Must Follow the Rules of Court and Ensure Legal Authority and Case Records are Accurate and Not AI Hallucinations.**

*Sheerer v. Panas* (2026)\_\_\_ Cal.App.4th\_\_\_ [2026 WL 776268]

#### **How Could This Case Help Your Clients?**

- This can help your clients understand that even if they are representing themselves:
  - They must follow [California's Rules of Court](#) by only providing true and correct case citations. This means they must not cite to AI (artificial intelligence) hallucinations. They may only cite real cases and must provide correct quotations and summaries of such cases.
  - They must accurately reference their case history and provide the location in the record on appeal of the case history they write about in their briefs.
  - They must format their briefs in accordance with California's Rules of Court.
  - They may be sanctioned for unreasonable violations of the Rules of Court, including citing to cases that are AI hallucinations.

#### **Summary of the Case**

In this case an ex-wife appealed a trial court order modifying child support payments owed by her ex-husband. The ex-husband, who was self-represented, cited cases that do not exist and fabricated quotes that do not appear in real cases in his respondent's brief. Also, his brief referenced hearings in his case that did not appear in the case's record, included unsupported irrelevant factual assertions and was formatted incorrectly. In response to ex-wife's motion to strike the respondent's brief, ex-husband explained he used an AI tool to draft the respondent's brief and did not verify his citations nor knowingly submit false information to the court.

The Court found ex-husband, although self-represented, should be held to the same standard as an attorney and thus was obligated to submit briefing that did not include false and missing citations. The Court also found that it could impose monetary sanctions against ex-husband because of his unreasonable violations of the Rules of Court. However, the Court chose not to sanction ex-husband because he admitted his error and the Court believed sanctions would not be in the best interest of the children at the heart of the underlying proceeding.

#### **PRACTICE TIPS**

1. Check citations and quotes in your and the opposing party's court filings.
2. Let the court know if your opposing party relies on cases that do not exist or provides quotes that are not in a real case.

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For questions or clarifications, email or call Family Violence Appellate Project at [info@fvaplav.org](mailto:info@fvaplav.org) or (510) 380-6243. Thank you!