محكمة قطر الدولية
ومركز تسوية المنازعات
QATAR INTERNATIONAL COURT
AND DISPUTE RESOLUTION CENTRE

In the name of His Highness Sheikh Tamim bin Hamad Al Thani,

Emir of the State of Qatar

Neutral Citation: [2025] QIC (E) 3

IN THE QATAR FINANCIAL CENTRE

CIVIL AND COMMERCIAL COURT

FIRST INSTANCE CIRCUIT

ANONYMITY WARNING – SOME CONTENTS OF THIS JUDGMENT HAVE BEEN ANONYMISED. NO PERSON SHALL REVEAL THE IDENTITY OF THE ANOMYISED INDIVIDUAL. ANY SUCH IDENTIFICATION BY ANY PERSON SHALL COMPRISE A CONTEMPT OF COURT FOR WHICH SANCTIONS WILL FOLLOW.

Date: 12 November 2025

CASE NO: CTFIC0033/2025

JONATHAN DAVID SHEPPARD

Claimant

v

JILLION LLC

Defendant

JUDGMENT

Before:

Lord Thomas of Cwmgiedd, President

Order

1. Contempt of court and breach of article 35.2 of the Rules and Procedures of the Civil and Commercial Court of the QFC proved.

2. There be no penal sanction.

Judgment

Background

1. This judgment relates to the citation by a lawyer in these proceedings of what purported to be decisions of the Qatar Financial Centre Civil and Commercial Court (the '**Court**') but which in fact were not, now usually referred to as 'fake cases'.

The facts

2. The Claimant brought a claim in relation to his employment with the Defendant. The Registry, as is usual, made an order for the service of a Defence.

3. An application was made on behalf of the Defendant by email at 13:29 on 29 September 2025 for an extension of time to serve the Defence. The application was made by a lawyer practising in Dubai who is referred to as the 'Dubai Lawyer' (for reasons explained at paragraph 25 below). The grounds put forward were that the principal of the Defendant, Mr Usman Ali, required hospitalisation which made it difficult to obtain instructions. After setting out the facts relied upon the application continued:

> *We crave leave to rely upon below:*
>
> > *• Article 9.2 QICDRC Rules – Court may extend or shorten time limits.*
> > *• Article 10.3 QICDRC Rules – Court may relieve a party from procedural default upon good cause.*
> > *• Article 11.8(2) QICDRC Rules – deadlines for Defence may be varied where justice so requires.*
> > *• Al Khor International School v. Gulf Contracting Co. (QFC 2022) – extensions granted for exceptional circumstances.*
> > *• Doha Bank v. KPMG (QFC App 2019) – fairness and proportionality override rigid deadlines.*
>
> The application was signed:
>
> *For and on behalf of Jillion LLC (Defendant)*

[Dubai Lawyer]
Counsel for the Defendant, Jillion LLC.

4. A further submission was made by the Dubai Lawyer on behalf of the Defendant by email at 17:06 the same day which set out a preliminary Defence and raised other issues, including a jurisdictional challenge; in respect of the jurisdictional challenge, the submission stated:

> *We crave leave of below precedent for jurisdiction challenge:*
>
> • *Doha Bank v. KPMG (QICDRC App 2019) – jurisdiction is interpreted narrowly and cannot be presumed where connection to QFC is tenuous.*

5. At 06:01 on the following morning, 30 September 2025, the Claimant, who was acting in person, made a request to the Court by email to direct the Defendant to provide the neutral citation to *Doha Bank v. KPMG*, as he had not been able to find it.

6. At 08:52 that same morning, the Registry ordered the Dubai Lawyer (who had a few minutes before sent to the Court a revised submission which referred again to the two cases) that he must:

> *... provide the Registry with a copy of each case that the Defendant and their legal representative have referred to in the emails they have sent to the Registry, namely: "Al Khor International School v. Gulf Contracting Co. (QFC 2022)" and "Doha Bank v. KPMG (QFC App 2019)", no later than 16.00 (Doha time) on Tuesday 30 September 2025.*

7. The Dubai Lawyer replied at 10:03 that same morning:

> *We will file the defence by tomorrow itself in order to not cause delay in the proceedings at all.*
>
> *Presently we are unable to access judgement copies of the cases on the website of court but once they are accessible apparently there is citation, hence, we humbly request that court may disregard the same.*

8. The Registry then ordered the Dubai Lawyer to provide copies of the cases and that in the event he could not, then to provide a witness statement including a statement of truth explaining (i) how he first came upon the two cases; and (ii) the propositions of law to which those cases relate regarding an extension of time.

9. The Dubai lawyer submitted a signed witness statement with a Statement of Truth which in its material part stated:

> *3. Error in Citations*
>
> *Upon subsequent review, I have realised that those references were made in error inadvertently due to copy paste errors and wrong research ,hence, wrongly The judgments as cited were not available in the form implied, and the references were inadvertently included due to reliance on secondary sources / incomplete case law databases by mistake.*
>
> *4. Clarification*
>
> *I confirm to this Honourable Court that:*
> *o The authorities referred to were not properly before the Court.*
> *o The error was inadvertent, and I accept full responsibility for the oversight.*

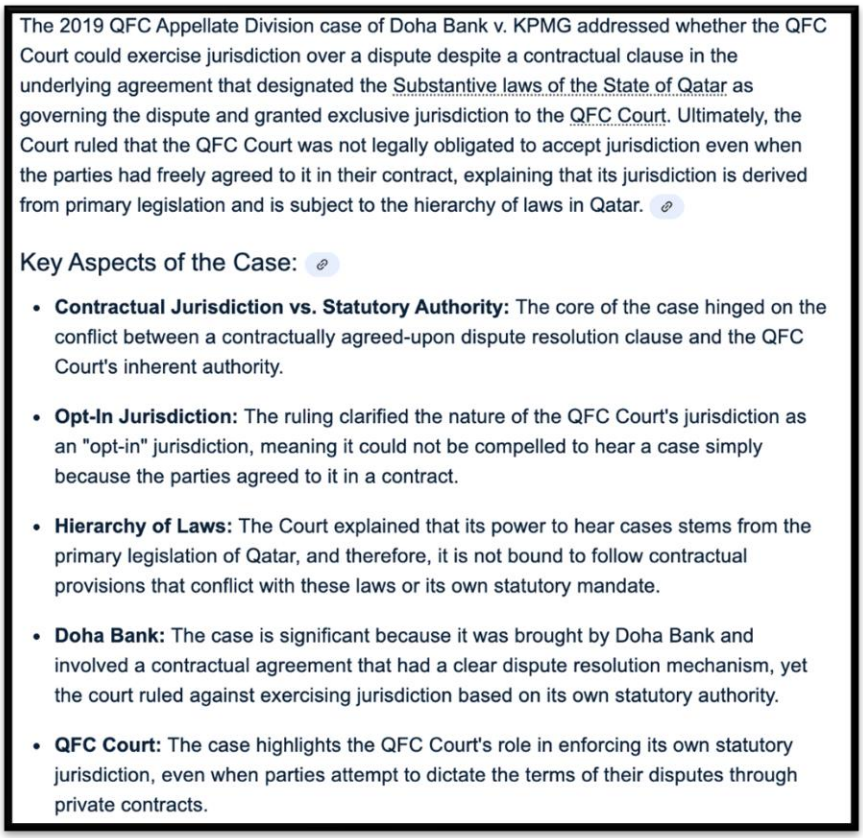
10. He apologised.

11. On the following day, 1 October 2025, the Registry asked him to explain where he had found the named cases.

12. The Dubai lawyer replied that same day stating:

> *The said cases came in search which may have been incorrect and attaching Google research screenshot references for your perusal and these were cited was in first email sent by Usman Ali to the Hon'ble court while helping Usman Ali as a friend in the matter whilst being In India during very late hours leading to this error.*

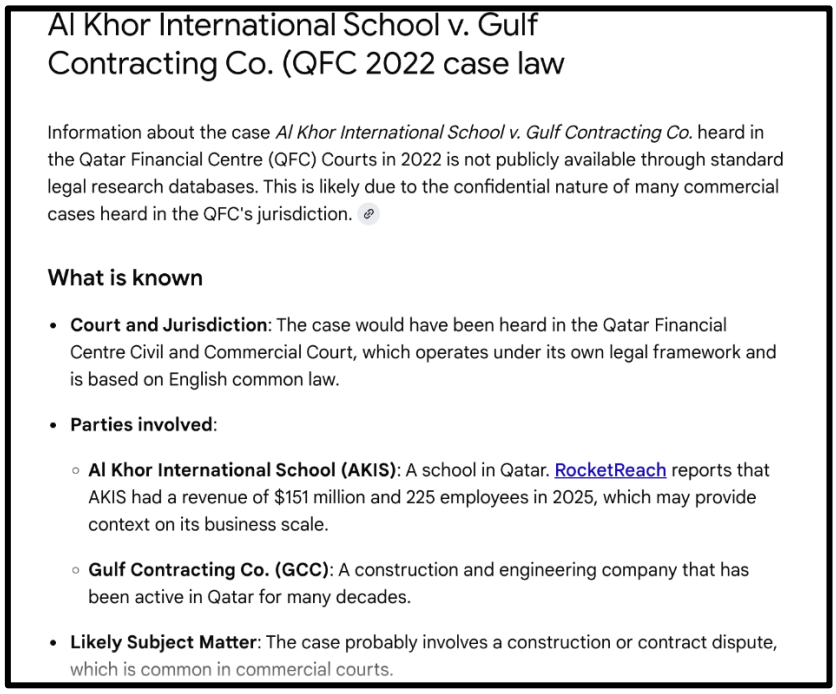
13. He again apologised and stated that the authorities were not properly researched "*due to inadvertent error and research mistake*." The screenshots appended were:



The 2019 QFC Appellate Division case of Doha Bank v. KPMG addressed whether the QFC Court could exercise jurisdiction over a dispute despite a contractual clause in the underlying agreement that designated the Substantive laws of the State of Qatar as governing the dispute and granted exclusive jurisdiction to the QFC Court. Ultimately, the Court ruled that the QFC Court was not legally obligated to accept jurisdiction even when the parties had freely agreed to it in their contract, explaining that its jurisdiction is derived from primary legislation and is subject to the hierarchy of laws in Qatar.

Key Aspects of the Case:

- **Contractual Jurisdiction vs. Statutory Authority:** The core of the case hinged on the conflict between a contractually agreed-upon dispute resolution clause and the QFC Court's inherent authority.
- **Opt-In Jurisdiction:** The ruling clarified the nature of the QFC Court's jurisdiction as an "opt-in" jurisdiction, meaning it could not be compelled to hear a case simply because the parties agreed to it in a contract.
- **Hierarchy of Laws:** The Court explained that its power to hear cases stems from the primary legislation of Qatar, and therefore, it is not bound to follow contractual provisions that conflict with these laws or its own statutory mandate.
- **Doha Bank:** The case is significant because it was brought by Doha Bank and involved a contractual agreement that had a clear dispute resolution mechanism, yet the court ruled against exercising jurisdiction based on its own statutory authority.
- **QFC Court:** The case highlights the QFC Court's role in enforcing its own statutory jurisdiction, even when parties attempt to dictate the terms of their disputes through private contracts.



Al Khor International School v. Gulf Contracting Co. (QFC 2022 case law

Information about the case *Al Khor International School v. Gulf Contracting Co.* heard in the Qatar Financial Centre (QFC) Courts in 2022 is not publicly available through standard legal research databases. This is likely due to the confidential nature of many commercial cases heard in the QFC's jurisdiction.

What is known

- **Court and Jurisdiction**: The case would have been heard in the Qatar Financial Centre Civil and Commercial Court, which operates under its own legal framework and is based on English common law.
- **Parties involved**:
  - **Al Khor International School (AKIS)**: A school in Qatar. RocketReach reports that AKIS had a revenue of $151 million and 225 employees in 2025, which may provide context on its business scale.
  - **Gulf Contracting Co. (GCC)**: A construction and engineering company that has been active in Qatar for many decades.
- **Likely Subject Matter**: The case probably involves a construction or contract dispute, which is common in commercial courts.

Reference to the Court of the conduct of the Dubai Lawyer

14. Having considered the matter, the Court decided that the actions of the Dubai Lawyer should be formally determined under article 35 of the Court's Rules and Procedures (the '**Rules**').

15. The Dubai lawyer was asked for his response on 8 October 2025. On 22 October 2025 he sent to the Court a written submission in which he again explained that he had acted to help a friend, Mr Usman Ali, who was hospitalised in Dubai. He explained that:

> *In those circumstances, I stepped in to help ensure that basic procedural correspondence was properly attended to and that the company's communications with the Honourable Court were not disrupted. My sole objective was to prevent prejudice to a litigant unable to act for medical reasons.*

16. He continued to maintain that his conduct had been inadvertent, and he had believed the cases were valid cases, but he acknowledged that he should have verified the cases from a database and not relied on secondary digital resources.

17. He tendered a full apology, claimed that his conduct had not caused any disadvantage to the Claimant and said he had learnt a lasting, personal and professional lesson. He submitted that:

> *... any adverse or disciplinary finding, however limited in intent, would have a disproportionate and irreversible effect on my professional standing. My career and livelihood are built solely upon an unblemished record of integrity before courts and regulatory authorities across multiple jurisdictions. Even the perception of impropriety could cause lasting harm, far exceeding the gravity of this inadvertent lapse. I therefore earnestly pray that this Honourable Court may, in its compassion, be pleased to view this episode through the lens of proportionality and allow me to continue my profession with my honour and credibility intact.*

The widespread use of fake authorities

18. Although this is the first occasion on which 'cases' have been cited to the Court which are not decisions of this Court, the issue is one that has arisen worldwide:

    i. One of the first, and certainly the most publicised, *Mata v Avianca Inc* was in the US District Court for the Southern District of New York 2023 before Castel J, where the lawyers for the Claimant relied on Chat GPT to do the legal research; it produced 5 non-existent cases which they cited to the court without checking. In a judgment given on 22 June 2023 (678 FSupp 3d 443), Castel J set out his view:

    > *In researching and drafting court submissions, good lawyers appropriately obtain assistance from junior lawyers, law students,*

contract lawyers, legal encyclopaedias and databases such as Westlaw and LexisNexis. Technological advances are commonplace and there is nothing inherently improper about using a reliable artificial intelligence tool for assistance. But existing rules impose a gatekeeping role on attorneys to ensure the accuracy of their filings. ... Rule 11, Fed. R. Civ. P. Peter LoDuca, Steven A. Schwartz and the law firm of Levidow, Levidow & Oberman P.C. (the "Levidow Firm") ... abandoned their responsibilities when they submitted non-existent judicial opinions with fake quotes and citations created by the artificial intelligence tool ChatGPT, then continued to stand by the fake opinions after judicial orders called their existence into question.

Many harms flow from the submission of fake opinions. The opposing party wastes time and money in exposing the deception. The Court's time is taken from other important endeavours The client may be deprived of arguments based on authentic judicial precedents. There is potential harm to the reputation of judges and courts whose names are falsely invoked as authors of the bogus opinions and to the reputation of a party attributed with fictional conduct. It promotes cynicism about the legal profession and the American judicial system. And a future litigant may be tempted to defy a judicial ruling by disingenuously claiming doubt about its authenticity.

ii. In England and Wales, Dame Victoria Sharp, President of the King's Bench Division in *R (on the application of Ayinde) v London Borough of Harringay* [2025] EWHC 1383 (Admin) pointed to the necessity of the Court being able to rely on the integrity and professionalism of advocates and pointed out at paragraphs 7 - 9:

Those who use artificial intelligence to conduct legal research notwithstanding these risks have a professional duty therefore to check the accuracy of such research by reference to authoritative sources, before using it in the course of their professional work (to advise clients or before a court, for example). Authoritative sources include the Government's database of legislation, the National Archives database of court judgments, the official Law Reports published by the Incorporated Council of Law Reporting for England and Wales and the databases of reputable legal publishers.

This duty rests on lawyers who use artificial intelligence to conduct research themselves or rely on the work of others who have done so. This is no different from the responsibility of a lawyer who relies on the work of a trainee solicitor or a pupil barrister for example, or on information obtained from an internet search.

We would go further however. There are serious implications for the administration of justice and public confidence in the justice system if artificial intelligence is misused. In those circumstances, practical and

effective measures must now be taken by those within the legal profession with individual leadership responsibilities (such as heads of chambers and managing partners) and by those with the responsibility for regulating the provision of legal services. Those measures must ensure that every individual currently providing legal services within this jurisdiction (whenever and wherever they were qualified to do so) understands and complies with their professional and ethical obligations and their duties to the court if using artificial intelligence.

iii. There are cases in many other jurisdictions including Canada (for example *Zang v Wei Chen* [2024] BCSC 285) and Australia (*Murray on behalf of Wamba Wemba Native Claim Group v State of Victoria* [2025] FCA 731) some of which are helpfully collected together in the judgment in *Ayinde.*

19. As this Court publishes all its decision on a freely available and searchable website and, being a relatively young Court, its case law is far less extensive than many other jurisdictions, the reference to fake cases should not have occurred. Although the use of artificial intelligence is to be welcomed in litigation with its potential to reduce cost and promote greater effectiveness, it is clear that a Practice Direction is required to set out the approach that litigators before this Court, as in other courts, must adopt. A draft of the Practice Direction for consultation is published at the same time as this judgment.

The decision in this case

20. Each court has its own powers to address any misuse of AI and the citation of fake cases. In England and Wales, the Hamid jurisdiction (*R (on the application of Hamid) v Secretary of State for the Home Department* [2012] EWHC 3070 (Admin.)), as part of the inherent jurisdiction of that Court, is used.

21. In this Court the relevant Rules are set out in article 35 which provides:

35.2 A person commits a contravention of a judgment, decision or order of the Court if, without reasonable excuse, the person does the following:
...
25.2.5 Engages in conduct that is intended to obstruct the Court in the exercise of any of its powers, including, without limitation:

...

(b)Giving information that is false or misleading.

35.3 The Court shall have the power to enforce its own judgments, decisions and orders, and to deal with contraventions of its judgments, decisions and orders and matters relating to contempt:

35.3.1 by the levy of fines; and/or

35.3.2. by the making of any order that it considers necessary in the interests of justice; and/or

35.3.3. by referring the matter to a relevant competent agency or authority of the State.

22. Contravention of article 35.2 and contempt require a requisite intention.

    i. Under article 35.2 it must be established that the conduct was intended to obstruct the Court in the exercise of its power by giving information that was false and misleading.

    ii. In order to establish contempt and conduct within article 35.2, it is necessary for the Court to be satisfied as to the requisite intentional conduct, as set out in the judgment of this Court in *Ferris v Sanguine Investment Management* [2024] QIC (E) 1.

23. It is difficult to see how any lawyer could, by the second half of 2025 be under any doubt as to the necessity of checking that a case provided by an AI system is in fact a decision set out in the jurisprudence of the court. Proceeding therefore to refer to such a case without making such a check ordinarily amounts to reckless conduct, not caring whether there was or was not such a case. In the present case the conduct goes further in that when the Registry asked for the citations, the Dubai Lawyer stated that he was unable to access judgment copies of the cases on the Court's website. It was only after two further requirements made by the Registry did the Dubai lawyer admit that the cases were provided by Google in the screenshots set out above.

24. In these circumstances, the Court does not accept that the conduct was inadvertent. It amounted to intentional conduct. There was plainly no reasonable excuse. The Dubai Lawyer therefore acted in contravention of article 35.2 and committed a contempt of court under article 35.3.

25. However, despite these findings and the circumstances set out, the Court considers that the apology tendered and the publication of this judgment will be a sufficient penalty and act as a sufficient deterrent to future conduct of this kind before this Court. In this particular case, the Court has considered whether it should anonymise the identity of the lawyer. The Court has concluded, not without very considerable hesitation, that identifying the Dubai lawyer would inflict on him a disproportionately harsh penalty given the nature and size of the legal profession practising within the states of the GCC and given that this is the first case where this has happened in this Court.

26. However, as the Practice Direction will make clear, any citation of any case or other authority to this Court which has not been verified by an examination by the advocate of the case or other authority, will be considered a breach of the conduct required of all advocates before the Court and sanctioned accordingly. The sanctions will include the full identification of the lawyer or law firm and the consequent public disgrace.

By the Court,

[signed]

Lord Thomas of Cwmgiedd, President

A signed copy of this Judgment has been filed with the Registry.

Representation

The Dubai Lawyer was self-represented.