

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**



Chambers of  
**JULIEN X. NEALS**  
United States District Judge

**M. L. KING JR. FEDERAL BLDG.  
& U.S. COURTHOUSE**  
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October 20, 2025

Via email: [rjc@ao.uscourts.gov](mailto:rjc@ao.uscourts.gov)

The Honorable Robert J. Conrad, Jr.,  
Office of the Director, Administrative Office of the United States Courts  
Thurgood Marshall Federal Judiciary Building  
One Columbus Circle, N.E., Room 7-100  
Washington, DC 20544

Dear Director Conrad:

By letter dated October 6, 2025, United States Senator Charles E. Grassley, in his capacity as Chairman, Committee on the Judiciary, wrote to me regarding the impact, if any, of generative artificial intelligence (“GenAI”) in preparing the June 30, 2025 draft Opinion and Order in *In re CorMedix Inc. Securities Litigation*, Case No. 2:21-cv-14020. Given the Administrative Office of the United States Courts’ creation of an AI Task Force and its ongoing efforts to examine ever evolving AI-related issues and recommend policies for the federal judicial branch, I write to provide the circumstances relevant to the *CorMedix* opinion. In this way, I provide you with answers to the questions that Senator Grassley has raised for your transmittal to the Senator.

In simplest terms, the June 30, 2025 *CorMedix* decision was released in error – human error – and withdrawn as soon as it was brought to the attention of my chambers, swiftly avoiding any irreparable harm to litigants or counsel. As referenced in the Senator’s letter, a “temporary assistant,” specifically, a law school intern, used CHATGPT to perform legal research in connection with the *CorMedix* decision. In doing so, the intern acted without authorization, without disclosure, and contrary to not only chambers policy but also the relevant law school policy. My

chambers policy prohibits the use of GenAI<sup>1</sup> in the legal research for, or drafting of, opinions or orders. In the past, my policy was communicated verbally to chambers staff, including interns. That is no longer the case. I now have a written unequivocal policy that applies to all law clerks and interns, pending definitive guidance from the AO through adoption of formal, universal policies and procedures for appropriate AI usage.<sup>2</sup>

The standard practice in my chambers is for every draft opinion to undergo several levels of review, including through cite checking tools, before being finalized and docketed.<sup>3</sup> In this case, however, the opinion that was mistakenly docketed on June 30, 2025, was an early draft that had not gone through the standard review process. It was a draft that should have never been docketed. Since then, I have taken preventative steps in my chambers including creating a written AI policy and further enhancing my multi-level opinion review policy to avoid future instances.

As soon as I verified the apparent mistakes identified in defense counsel's July 22, 2025 letter, I maintained transparency and the chronology of the docket in the case by noting that the June 30, 2025 Opinion and Order had been removed from the record. I did not wish to leave a flawed opinion on the record and did not want parties, including *pro se* litigants, to believe that the erroneously released draft should be cited to or relied on in future cases. Thus, acting in full transparency and for the benefit of litigants and attorneys, I removed the inaccurate Opinion and Order

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<sup>1</sup> It is important to distinguish between using GenAI for drafting content from using commonplace research tools, which inevitably have AI functionality integrated in a manner that is unavoidable when using the tool.

<sup>2</sup> The AO has provided interim guidance to federal judges and chambers staff for usage of AI tools. "[The Interim Guidance] is intended to allow for the use of and experimentation with AI tools while preserving the integrity and independence of the federal courts. It is not exhaustive and is intended to provide only temporary guideposts while more permanent guidance and policy is developed." *Memorandum from the Honorable Robert J. Conrad, Jr., Re: Interim Guidance on Artificial Intelligence in the Judiciary and Artificial Intelligence Task Force Update*, dated July 31, 2025, at p. 2.

<sup>3</sup> The vendor that supplies the cite checking tool incorporates AI technology into that feature. Nevertheless, my law clerks are instructed to review and verify the work of the cite checking tool.

from public view on the docket. The final opinion acknowledges – again, in the interests of candor and accuracy – that a preliminary draft had been inadvertently filed. See 21cv14020-JXN-CF ECF No. 130 at 10 n.13 (“On June 30, 2025, the Court inadvertently issued a preliminary draft opinion, which the Court withdrew from the docket. (ECF No. 126).”).<sup>4</sup>

Consistent with the Code of Conduct for United States Judges, I took immediate and appropriate action to address the student intern’s conduct that resulted in the mistake. (Importantly, I point out that the intern who used GenAI in this case did not have access to any sealed, privileged, confidential, or otherwise non-public case information.) I would be remiss if I did not point out as well that the law school where the intern is a student contacted me after the incident to, among other things, inform me that the student had violated the school’s strict policy against the use of GenAI in their internships.

I cannot speak to litigants’ use of GenAI tools in drafting their filings and, at this time, do not have any rules or personal preferences regarding this type of conduct. With that said, I take most seriously my judicial responsibility to ensure that Opinions and Orders are accurate, thorough, and complete, and I will continue to do so. While my experience in the *CorMedix* case was most unfortunate and unforeseeable, I hope that, at the very least, it will inform the AO Task Force’s continuing work and ultimately lead to new meaningful policies for all federal courts.

Respectfully,

A handwritten signature in black ink, appearing to read 'J. Neals', with a long horizontal stroke extending to the right.

JULIEN X. NEALS, U.S.D.J.

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<sup>4</sup> The Clerk’s Office maintains a copy of Opinions and Orders in accordance with applicable record retention requirements, see [Records Disposition Schedule](#), the draft opinion will not be used or maintained for any other purpose.