

TEMPLATE 5 · CITATIONS

## Legal Research & Citation Verification Certification

### CASE CAPTION

<b>Court</b>	<b>Case no.</b>
_____	_____
<b>Plaintiff(s)</b>	<b>Defendant(s)</b>
_____	_____
<b>Judge</b>	<b>Magistrate / related</b>
_____	_____
<b>Filing certified (title)</b>	<b>Dkt.</b>
_____	_____

### FILER

<b>Attorney name</b>	<b>Bar no.</b>	<b>State</b>
_____	_____	_____
<b>Firm</b>	<b>Role (e.g., lead, co-counsel)</b>	
_____	_____	
<b>Client (or redacted id.)</b>	<b>Date of certification</b>	
_____	_____	

### VERIFICATION DATABASES USED

Identify the primary legal-research databases against which each cited authority was personally retrieved and read. Generality at this level is acceptable; do not list specific search strings, prompts, or iterative drafting workflows.

- Westlaw / Westlaw Precision
- LexisNexis / Lexis+
- Bloomberg Law
- Fastcase / vLex
- Court PACER / state court official record
- Official reporters (print or publisher PDF)
- Other (specify):  
**Other database(s)**  
\_\_\_\_\_

### CERTIFICATION OF CITATION VERIFICATION

The undersigned attorney certifies, pursuant to Federal Rule of Civil Procedure 11(b) and Model Rules of Professional Conduct 1.1, 3.1, and 3.3, that:

- (1) Counsel has personally retrieved and read each cited opinion, statute, regulation, treatise, and secondary source from a primary legal research database identified above;
- (2) Counsel has confirmed that each cited authority exists and is correctly identified by jurisdiction, court, year, reporter, page, and parallel citation;
- (3) Counsel has confirmed that each cited authority remains good law as of the date of this certification, including (where applicable) by Shepardizing, KeyCiting, or BCite verification;
- (4) Counsel has confirmed that each direct quotation is verbatim and that each parenthetical accurately summarizes the cited court's holding or reasoning;
- (5) Counsel has confirmed that each cited authority supports the proposition for which it is cited and is not relied upon for a proposition the cited court did not reach; and
- (6) Where multiple attorneys signed this filing, every signing attorney has individually verified the authorities relied upon in the portions of the filing that attorney drafted, reviewed, or adopted, consistent with *Wadsworth v. Walmart*, No. 2:23-cv-118-KHR (D. Wyo. Feb. 24, 2025).

### Q1 2026 sanctions context

The Sixth Circuit's \$30,000 aggregate sanction in *Whiting v. City of Athens* (Mar. 2026) and Magistrate Judge Mark Clarke's \$109,700 Oregon order against Stephen Brigandi (Apr. 4, 2026) both turned on citation accuracy, not on AI disclosure. Verification — not disclosure — is the dispositive compliance act.

## PER-CITATION LOG (OPTIONAL — INTERNAL USE)

Use this log if a court-filed certification is supplemented by an in-camera or work-product log documenting verification. Do NOT file this log without first considering work-product implications.

Citation 1	Database	Verified by
_____	_____	_____
Citation 2	Database	Verified by
_____	_____	_____
Citation 3	Database	Verified by
_____	_____	_____
Citation 4	Database	Verified by
_____	_____	_____
Citation 5	Database	Verified by
_____	_____	_____

## SIGNATURE — DRAFTING ATTORNEY

Signature

\_\_\_\_\_

Printed name

Bar no.

Firm

Date

Email

Phone

## SIGNATURE — ADDITIONAL SIGNING ATTORNEY (if any)

Signature

Printed name

Bar no.

Firm

Date

Email

Phone

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