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Electronically FILED by
Superior Court of California,
County of Los Angeles
9/03/2026 1:18 PM
David W. Slayton,
Executive Officer/Clerk of Court,
By K. Gray, Deputy Clerk

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Attorneys for Defendant STATE FARM GENERAL INSURANCE COMPANY

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, SOUTH CENTRAL DISTRICT**

FA'ALAGILAGI MENI-SILIGA,

Plaintiff,

vs.

A'S CONTRACTOR INC., OCTAVIAN
PETRUT, ADVANCED PUBLIC
ADJUSTING, INC., STATE FARM
INSURANCE COMPANY, INC.,
HUDSON INSURANCE COMPANY,
and DOES 1 through 50,

Defendants.

CASE No. 24CMCV01105

[Assigned to Hon. Elizabeth L. Bradley,
Dept. A]

**DECLARATION OF JACQUELENE
A. ROBINSON IN ADVANCE OF
OSC RE: WHY THE COURT
SHOULD NOT ORDER ROBINSON
TO PAY REASONABLE MONETARY
SANCTIONS TO THE COURT**

Date: September 11, 2026
Time: 10:00 a.m.
Dept.: A

ACTION FILED: JULY 18, 2024
TRIAL: OCTOBER 5, 2026

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1 **DECLARATION OF JACQUELENE A. ROBINSON**

2 I, Jacqueline A. Robinson, declare and state as follows:

3 1. I am an attorney admitted to practice law before this Court and all courts
4 in the State of California. I am a Senior Associate with the law firm of Musick, Peeler
5 & Garrett LLP, attorneys of record for Defendant State Farm General Insurance
6 Company (“State Farm”). I have personal knowledge of the facts set forth herein and
7 if called as a witness, I could and would competently testify thereto.

8 2. This Declaration is being submitted to the Court in advance of the
9 September 11, 2026 Order to Show Cause Hearing re: Why The Court Should Not
10 Order Attorney Jacqueline A. Robinson to Pay Reasonable Monetary Sanctions to the
11 Court. This Declaration is also being provided to the Court to supplement statements
12 I made in the following documents filed with the Court on August 11, 2026:

13 a. Declaration of Jacqueline A. Robinson Regarding State Farm
14 General Insurance Company’s Inadvertent Citation to Non-
15 Existent Case Law and Citations In Its Motions *in Limine* Filed in
16 This Action; and

17 b. Declaration of Jacqueline A. Robinson Regarding State Farm
18 General Insurance Company’s Redlined Motions *in Limine*
19 Striking Citations to Nonexistent Case Law and Citations in the
20 Same, which simultaneously included the following exhibits:

21 i. Exhibit “B”: Redlined copy of State Farm General Insurance
22 Company’s Notice of Motion and Motion *in Limine* No. 1 to
23 Exclude Evidence, Argument and Reference to Other Claims
24 and Lawsuits;

25 ii. Exhibit “C”: Redlined copy of State Farm General Insurance
26 Company’s Notice of Motion and Motion *in Limine* No. 2 to
27 Exclude Evidence or Argument Regarding the Licensing
28 Status of Any Insurance Adjuster Who Handled,

Investigated, or Was Involved in Plaintiff's Claims;

iii. Exhibit "D": Redlined copy of State Farm General Insurance Company's Notice of Motion and Motion *in Limine* No. 3 to Preclude Argument, Reference, Testimony or Evidence of Alleged California Insurance Regulation Violations as Independently Actionable; and

iv. Exhibit "E": Redlined copy of State Farm General Insurance Company's Notice of Motion and Motion *in Limine* No. 5 to Preclude Any Evidence, Testimony, or Argument Regarding the Issue Of The Amount of Any Recoverable Attorneys' Fees Sought by Plaintiff Under *Brandt*.

Copies of each of these declarations, as well as the accompanying exhibits, were filed and served on counsel for Plaintiff on August 11, 2026.

3. Following the August 7, 2026 Further Final Status Conference in this matter where counsel for Plaintiff – Eric M. Khodadian, Esq. of Cummins & White LLP and Michael Shaolian, Esq. with the Shaolian Law Firm APC – informed the Court and my firm for the first time that they had discovered several citations in State Farm's motion *in limine* filings that were "fabricated" and possibly "hallucinations," and after I investigated and discovered that Mr. Khodadian and Mr. Shaolian were correct, I re-reviewed my firm's (Musick, Peeler & Garrett LLP) Policy on Use of Generative AI Tools, a copy of which was re-circulated firmwide on August 10, 2026.

4. After discovering what had occurred, I also took affirmative steps to educate myself concerning the responsible use of generative AI in the legal practice. Among those steps, I attended a CLE course on August 20, 2026 hosted by Thomson Reuters entitled "Beyond the Hype: Practical AI Ethics for Legal Practitioners." The course specifically addressed the use of generative AI and its relationship to an attorney's duties of competence and ethics. I did so because I wanted to understand the failure that occurred and make sure that I changed my practices moving forward.

1 However, I do not offer that education as an excuse for what occurred; the
2 responsibility for the filings was mine and I accept that responsibility. I instead offer
3 it as evidence of the steps I have taken since the incident to ensure that it does not
4 happen again. A true and correct copy of my certificate of attendance is attached
5 hereto as Exhibit “1.”

6 5. Based on my efforts identified in Paragraphs 3 and 4 above, I have
7 instituted a personal practice to (1) independently retrieve every authority from
8 Westlaw, Lexis Nexis or another reliable source, (2) check every quoted proposition
9 against the actual opinion, (3) perform a citation audit before submitting any filing to
10 the Court, (4) ensuring that no AI-generated case citation can be used without
11 independently locating and reading the actual opinion, and (5) independently verifying
12 any and all AI-generated legal authorities.

13 6. I recognize that citation to fabricated authorities, especially those
14 included in submissions to the Court, is unacceptable. I accept full responsibility for
15 my erroneous citations and make no excuses and express my deepest and sincerest
16 apologies to the Court.

17 7. I respectfully request that the Court consider the totality of the
18 circumstances, including my prompt acceptance of responsibility and corrective action
19 in the form of investigation and identification of nonexistent case law and citations
20 and filing of redlined motions *in limine* addressing the same. I have also implemented
21 specific safeguards identified in Paragraph 5 above to ensure that every authority in
22 any future filing is independently verified against the actual source.

23 8. I am deeply remorseful that this occurred and respectfully ask the Court
24 to discharge the OSC without any monetary sanctions. If the Court nevertheless
25 concludes that some sanction is warranted, I respectfully ask that the Court impose a
26 significantly lesser sanction based upon the above, as well as my statements made in
27 my declarations identified in Paragraph 2 above.

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1 I declare under penalty of perjury under the laws of the State of California that
2 the foregoing is true and correct. Executed on this 3rd day of September, 2026, at Los
3 Angeles, California.

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5 
6 _____
Jacqueline A. Robinson

EXHIBIT 1

CERTIFICATE of COMPLETION CALIFORNIA



THIS CERTIFIES THAT:

Jacqueline Robinson

BAR/LICENSE NUMBER:

305628

COMPLETED:

Beyond the Hype Practical AI Ethics for Legal Practitioners (Webcast to all segments) - 8.20.26



Live Webcast

COMPLETION DATE: 08/20/2026

TOTAL CREDITS OFFERED: 1.00

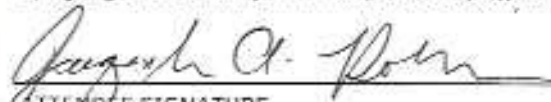
CODE: _____

SPECIALTY CREDITS OFFERED: 1.00

TOTAL CREDITS EARNED: 1.00

<u>0.00</u>	Earned Civility
<u>0.00</u>	Earned Competence/Prevention & Detection
<u>0.00</u>	Earned Elimination of Bias
<u>1.00</u>	Earned Ethics
<u>0.00</u>	Earned Implicit Bias
<u>0.00</u>	Earned Technology
<u>0.00</u>	Earned Wellness Competence

By signing below, I certify that I completed the program above and am entitled to the credits shown.



ATTENDEE SIGNATURE



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3625 Brookside Parkway, Suite 450
Alpharetta, GA 30022



STEPHANIE AWE, REGISTRAR

California Provider #4710

1 **PROOF OF SERVICE**

2 **Fa'Alagilagi Meni-Siliga v. A's Contractor, Inc., et al.**
3 **Los Angeles County Superior Court, Case No. 24CMCV01105**

4 **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

5 At the time of service, I was over 18 years of age and not a party to this action. I am
6 employed in the County of Los Angeles, State of California. My business address is 333 South
7 Hope Street, Suite 2900, Los Angeles, CA 90071-3048.

8 On September 3, 2026, I served true copies of the following document(s) described as
9 **DECLARATION OF JACQUELENE A. ROBINSON IN ADVANCE OF OSC RE: WHY**
10 **THE COURT SHOULD NOT ORDER ROBINSON TO PAY REASONABLE**
11 **MONETARY SANCTIONS TO THE COURT** on the interested parties in this action as
12 follows:

13 **SEE ATTACHED SERVICE LIST**

14 ☒ **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the
15 document(s) to be sent from e-mail address c.staley@musickpeeler.com to the persons at
16 the e-mail addresses listed in the Service List. I did not receive, within a reasonable time
17 after the transmission, any electronic message or other indication that the transmission was
18 unsuccessful.

19 I declare under penalty of perjury under the laws of the State of California that the
20 foregoing is true and correct.

21 Executed on September 3, 2026, at Los Angeles, California.

22 
23 Cindy L. Staley

SERVICE LIST

Fa'Alagilagi Meni-Siliga v. A's Contractor, Inc., et al.
Los Angeles County Superior Court, Case No. 24CMCV01105

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