FEDERAL COURT

B E T W E E N:

SAMUELSON-GLUSHKO CANADIAN INTERNET POLICY

AND PUBLIC INTEREST CLINIC

Applicant

- and -

ANKIT SAHNI

Respondent

MEMORANDUM OF FACT AND LAW OF THE RESPONDENT

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TO: **THE ADMINISTRATOR**
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AND TO: **SAMUELSON-GLUSHKO**
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PART I – OVERVIEW

1.   This is an application for judicial review of the Registrar of Copyright's (the "Registrar") decision to issue a copyright registration certificate for the work SURYAST (the "Certificate").

2.   The Respondent, Ankit Sahni, and RAGHAV, a generative artificial intelligence ("AI") model, are the authors of SURYAST. The Certificate issued by the Registrar is valid. The decision of the Registrar to issue the Certificate should be upheld.

3.   The only issue before this Court is whether the Registrar erred in issuing the Certificate. The facts in this case do not raise broader public policy questions regarding the merits of AI use. The involvement of AI does not preclude copyright protection. The determination of whether AI may be recognized as an author is a matter for Parliament, not the courts.

4.   While the Respondent respectfully submits that the focus of this application for judicial review must be the decision of the Registrar to issue the Certificate, to the extent that this Honourable Court feels it necessary to address the questions of the role of AI in the creation of the SURYAST work, the evidence demonstrates that the Respondent and RAGHAV exercised skill and judgement and made unique contributions to the creation of SURYAST. The work is a tangible expression that would not exist without both of their respective contributions.

5.   As a result, the Respondent respectfully asks this Court to declare both him and RAGHAV as co-authors of SURYAST and to dismiss this application.

PART II – FACTS

A. Background

6.   The Respondent, Ankit Sahni, is an intellectual property lawyer residing in New Delhi, India. RAGHAV Artificial Intelligence Painting Application ("RAGHAV") is a generative artificial intelligence model. Together, the Respondent and RAGHAV created the artwork entitled SURYAST.[1]

7.   The Respondent accepts the description of the background facts as set out by the Applicant.

B. The Creation of the Work

8.   The Respondent generated SURYAST by utilizing an original photograph taken by him in 2020 using his phone camera. The Respondent is the sole author of the photograph.[2] The photograph is reproduced below as Figure 1.

Figure 1: Photograph taken and owned by Ankit Sahni

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[1] Ankit Sahni, *Affidavit of Ankit Sahni* (12 May 2025) at para 1 [Sahni, *Affidavit*].
[2] *Ibid* at para 3.

9.   The Respondent used the above photograph in the creation of SURYAST.[3] The Respondent also used Vincent van Gogh's *The Starry Night* (reproduced below as Figure 2) in the creation of SURYAST.[4] As of the date of the creation of SURYAST, the copyright in *The Starry Night* had lapsed and this latter work is in the public domain.

Figure 2: The Starry Night by Vincent Van Gogh

10.   RAGHAV is based on the Neural Style Transfer technique, which is built using the Convolutional Neural Network. The Neural Style Transfer technique allows the user to generate an image using the same *content* as the base image, but in the *style* of the chosen style input image.[5]

11.   The Respondent used Figure 1 as the content image[6] and *The Starry Night* as the style image.[7] Both choices were deliberate and involved the use of the Respondent's skill and judgement. The Respondent deliberately included features in this photo such as the sunset,

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[3] *Ibid* at para 2.
[4] *Ibid* at para 6.
[5] Raghav Gupta, *Affidavit of Raghav Gupta* (12 May 2025) at para 13 [Gupta, *Affidavit*].
[6] Sahni, *Affidavit*, *supra* note 1 at para 4.
[7] *Ibid* at para 7.

clouds, and the contours of a building, and framed it in such a way so that the sky accounts for the upper two thirds of the work.[8] In selecting *The Starry Night*, the Respondent considered the particular patterns and brushstrokes contained in the image, the ability of RAGHAV to learn them, and the similarity of features in both the content and style images (such as the sky, the buildings, etc.).[9]

12. The Respondent also exercised skill and judgement in selecting a variable value, which relates to the amount of style transfer between the content and style images by RAGHAV.[10] The variable value considered the precise and deliberate style of *The Starry Night* and considered how the features of the style image would merge with the features of the content in the Figure 1 image.[11] A different variable value leads to a different result.[12]

13. The output image created from this process, entitled SURYAST, is provided below as Figure 3.

Figure 3: SURYAST by Ankit Sahni and RAGHAV

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[8] *Ibid* at para 4.
[9] *Ibid* at para 7.
[10] *Ibid* at para 8.
[11] *Ibid* at para 9.
[12] Gupta, *Affidavit*, *supra* note 5 at para 19.

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14.   RAGHAV's contributions to SURYAST are distinct and independent from the Respondent's work and are a consequence of RAGHAV's unique capabilities to render original artistic works. RAGHAV's ability stems from its inherent neural structure which is similar to the biological neurons of the nervous system.[13]

C. The Registration of Copyright

15.   The Respondent registered copyright in SURYAST in Canada on December 1, 2021 (Registration #: 1188619).[14]

16.   Each of the Respondent and RAGHAV contributed to, and played essential roles in, the creation of SURYAST. In recognition of such, and with the intention of accurately and honestly reflecting how SURYAST was created, the Respondent listed both himself and RAGHAV as the authors of SURYAST.[15]

PART III – POINTS IN ISSUE

17.   This application raises the following issues:

  i.   Has the Applicant met its burden to show that the Registrar of Copyright erred in issuing the Certificate?

  ii.   If so, should the Court exercise its discretion to amend the Certificate or direct the Registrar of Copyright to do so?

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[13] *Ibid* at para 6.
[14] Sahni, *Affidavit*, *supra* note 1 at para 14.
[15] *Ibid* at paras 15, 17.

PART IV – SUBMISSIONS

 A. The Main (and Only) Issue Before the Court Is the Decision of the Registrar of Copyright to Issue the Copyright Registration Certificate

18. This proceeding is an application for judicial review of the Registrar's decision to issue the Certificate.

19. Many of the Applicant's arguments are directed to the desirability or undesirability from a Canadian public policy perspective of large language models or AI being able to create original works.

20. However, the only issue squarely before this Honourable Court is whether or not it should disturb the decision of the Registrar to issue the Certificate as issued.

21. Whichever way this Honourable Court rules will have no bearing on the public policy question of whether AI is a good thing or a bad thing. It is up to Parliament to decide whether, and, if so, how, to deal with AI through legislation and regulation.

22. While the Respondent takes no position on whether or not the Applicant has standing to bring this application, the Respondent notes that the Applicant has chosen not to name the Registrar of Copyright, the decision-maker itself whose decision is being challenged, as a respondent or co-respondent to this proceeding. Indeed, the Respondent is not aware whether the Registrar of Copyright received a copy of the Applicant's materials and what position it would take. As a result, it is left to the Respondent, an individual, while a solicitor, but not called to the Bar in Canada, to defend the Registrar's decision.

23. The Respondent respectfully submits that the Applicant has failed to bring all of the proper and necessary parties to this proceeding to determine the validity of the Certificate in question.

1)   The Copyright Registration Certificate is Valid

24.   The onus is on the Applicant to demonstrate that the Registrar erred in law in issuing the Certificate.

25.   While the Court may opt to exercise its discretion, the Registrar is entitled to an appropriate degree of deference.[16]

26.   The Registrar has determined that rigorous examination of applications for registration is unnecessary. Unlike other intellectual property such as patents and trademarks, copyright law is *sui generis*.

27.   In *Théberge v Galerie d'Art du Petit Champlain Inc*, 2002 SCC 34, the Court defined copyright as "a balance between promoting the public interest in the encouragement and dissemination of works of the arts and intellect and obtaining a just reward for the creator (or, more accurately, to prevent someone other than the creator from appropriating whatever benefits may be generated."[17]

28.   The simple purpose of copyright registration is to provide official proof of ownership for creative works. Indeed, in Canada, copyright registration automatically exists upon creation. Registration simply provides a legal certificate to be held by the owner to protect against infringers. This stands in contrast to patents granted under the *Patent Act*[18] and registrations issued under the *Trademarks Act*[19] and *Industrial Design Act*[20] which provide for examination of applications because the registrations issued by those branches of the Canadian

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[16] *Dunsmuir v New Brunswick*, 2008 SCC 9 at para 36 [*Dunsmuir*]; *Canada (Minister of Citizenship and Immigration) v Vavilov*, 2019 SCC 65 at paras 30–31.
[17] *Théberge v Galerie d'Art du Petit Champlain Inc.*, 2002 SCC 34 at para 30.
[18] *Patent Act,* R.S.C., 1985, c. P-4. [*Patent Act*]
[19] *Trademarks Act*, R.S.C., 1985, c. T-13. [*Trademarks Act*]
[20] *Industrial Designs Act,* R.S.C., 1985, c. I-9. [*Industrial Designs Act*]

Intellectual Property Office have greater consequence and create enforceable statutorily

recognized legal monopolies.

29.   Given the more limited rights conferred by a certificate of copyright, the Registrar

has determined the appropriate protocols for issuance of certificates, and deference should be

paid to this determination.[21]

30.   If the Applicant wishes to call the Registrar's process into question, the Registrar

should be present to defend the regime under which it operates.

2)   What a Copyright Registration Certificate Is (and Is Not)

31.   The absence of an examination process for copyright registration in Canada

comparable to that provided for in the *Patent Act*, *Trademarks Act* and *Industrial Design Act* can

perhaps be explained by the fact that, in contrast to an issued patent, a trademark or industrial

design registration, a Canadian copyright registration does not in and of itself confer any legal

monopoly.

32.   Rather, a Canadian copyright registration raises certain evidentiary presumptions.

Those presumptions are rebuttable. The context in which such presumptions arise is primarily, if

not exclusively in the context of a copyright infringement action brought by the registrant. The

Respondent has not sued the Applicant (or anyone else) for copyright infringement in respect of

the work covered by the registration.

33.   The copyright registration certificate is not an *in rem* pronouncement on the

merits or desirability of works which are created in whole or in part by AI.

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[21] *Dunsmuir*, *supra* note 16 at para 48.

34.   In the present case, the Certificate accurately reflects that the work in question, "SURYAST" was created on the date specified combining the contributions as authors of Mr. Sahni and RAGHAV.

35.   In the circumstances, the Certificate is as accurate as it could be. The SURYAST work did not exist before it was created and so the date of creation is correct. Mr. Sahni cannot claim to be the sole author of SURYAST (even though he is the sole author of the underlying original photograph, i.e., Figure 1). Similarly, one cannot say that the SURYAST work was created wholly by RAGHAV, as it needed the input photograph taken by Mr. Sahni and the stylistic inputs, to deliver the original creation as its output.

B. SURYAST has Two Authors – Mr. Sahni and RAGHAV

36.   As noted above, it would be inaccurate to say that either Mr. Sahni or RAGHAV is the sole author of the SURYAST work.

1) The Unique Contributions of Each Author

37.   Mr. Sahni contributed the original photograph taken by him in 2020. In taking and in choosing this picture as the content input for RAGHAV, Mr. Sahni "deliberately included features in this photo such as the sunset, clouds, and the contours of a building, and framed it in such a way so that the sky accounts for the upper two thirds of the work."[22]

38.   Mr. Sahni then selected Vincent Van Gogh's painting titled *The Starry Night* as the style input and selected a variable value.[23]

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[22] Sahni, *Affidavit*, *supra* note 1 at para 4.
[23] *Ibid* at para 8.

39.   RAGHAV has the ability to learn and use the patterns and brushstrokes of the artist from the style input.[24]

40.   As noted by RAGHAV's creator, Raghav Gupta, "Neural style transfer is a technique that allows us to generate an image with the same "content" as a base image, but with the "style" of our chosen picture."[25]

41.   RAGHAV took the inputs skillfully chosen by Mr. Sahni and "learned" from them. RAGHAV is built on a neural network known as a Convolutional Neural Network ("CNN"). CNN permits "novel exploration".[26] The CNN model can capture a local manifold from an individual artist or painting style. The embedding space can be explored and new stylizations can be generated by varying local style changes for a specific painting style. Thus, new styles can be used (either entirely different or a variation of a given style image) for a different output each time for the same content image."[27]

42.   SURYAST is a work that was created from the skill and judgement of *both* Mr. Sahni and RAGHAV. Neither could have developed the work without the necessary contribution of the other.

43.   Therefore, each is rightfully an author and a co-author.

44.   It is incorrect to suggest, as the Applicant appears to do, that all Mr. Sahni contributed was an idea. The photograph which he took is a tangible expression of an idea (of

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[24] Gupta, *Affidavit*, *supra* note 5 at para 22.
[25] *Ibid* at para 13.
[26] *Ibid* at para 22.
[27] *Ibid*.

which Mr. Sahni is the owner of copyright). Vincent Van Gogh's *The Starry Night* work is also a tangible expression of an idea albeit one in which copyright has entered the public domain.

45.   Mr. Sahni carefully chose these inputs and the variable value with the intent of creating a new, original work.

46.   The contribution of RAGHAV was a learning of both inputs and using specific elements of each to choose where and how to implement shade, brushstrokes, and other artistic features visible in the new, original work.

47.   The result is a new, original work, SURYAST, which did not exist before and is a tangible expression of the combined contributions of each of Mr. Sahni and RAGHAV.

2) The Involvement of AI Does Not Preclude Copyright Protection

48.   There is no inherent reason why involving AI should preclude copyright protection. There is nothing in the *Copyright Act*[28] which speaks to bars to obtaining or maintaining copyright protection in a work in which copyright subsists. This is in contrast to, for example, the *Patent Act*, where an issued patent can be invalidated based on the failure to work a patent; or the invalidation of a registered trademark based on its losing distinctiveness, etc.

49.   If the involvement of AI would render a work in which copyright otherwise subsists to no longer be subject to copyright protection in Canada, the *Copyright Act* would have to say so. It does not. It is up to Parliament to amend the *Copyright Act* if this is to be the case as other jurisdictions, including the UK, Ireland, and New Zealand, have opted to do in the case of attribution of authorship of computer-generated works.[29]

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[28] *Copyright Act*, RSC 1985, c C-42 [*Copyright Act*].
[29] Canada, Innovation, Science and Economic Development Canada, "Consultation paper: Consultation on Copyright in the Age of Generative Artificial Intelligence" (05 December 2024) at s 2.2.2, online:

3)   Copyright Subsists in Artistic Works Where Authors Employ Tools That Incorporate Elements of Randomness

50.   At some level, the *Copyright Act* always seems to be faced with the challenges of having to catch up to advances in modern technology. The advent of televising professional football games in the 1950's[30], or videocassette records in the 1970's and 1980's[31] has not stopped this Honourable Court from interpreting the *Copyright Act* as it was read at the applicable time.

51.   Even before the advent of AI, works in which copyright subsists have been created with elements of randomness. Examples of such works may include:

a) Tye-Dye shirts where the artist places a t-shirt on a spinning disk and squeezes dye onto the spinning shirt. Due to variables which the artist does not control, e.g. the exact speed of the spinning disk, the path of the dye towards the shirt etc., no two shirts are exactly alike, but copyright subsists in the unique designs on each of them;

b) Some modern artists have been known to take a blank canvas, place it on a wall or easel, dip their paint brush into paint and throw the paint at the canvas, not knowing exactly what the work will look like due to variables they do not control. Jackson Pollock's works are a prime example of this styling. Still copyright subsists in those works; and

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<https://ised-isde.canada.ca/site/strategic-policy-sector/en/marketplace-framework-policy/consultation-paper-consultation-copyright-age-generative-artificial-intelligence>.

[30] *Canadian Admiral Corporation Ltd v Rediffusion Inc.*, 1954 CanLII 712 (CA Ex Ct), [1954] Ex CR 382.

[31] *Bishop v Stevens*, [1990] 2 SCR 467.

c) Random number generators, the result of computer algorithms, useful for two-factor authentication as well as for recreational purposes like helping players place gambling bets or pick lottery numbers, create a defined series of numbers from which tables can be created and in which copyright would subsist.

52.   In each example, while the outcome was not entirely predetermined, and indeed could be construed as random, each work is an exercise in skill and judgement, original, an expression of an idea, and fixed in a material form. They each meet the test of copyright.

53.   SURYAST is equally created as an exercise in skill and judgement, original, an expression of an idea, and fixed in a material form, developed from both the contributions of a human (Mr. Sahni) and a generative AI (RAGHAV).

4)   SURYAST Is a Tangible Expression, Not an Idea

54.   SURYAST is not an abstract idea. SURYAST is a tangible expression of an idea. It is a work which did not exist until it was created.

55.   An idea may be something like an artist musing "I would like to make a piece of art where a banana is taped to a blank canvas on a wall". However, once the artist tapes the banana to the wall, the idea has transformed into a tangible expression and thus a work in which copyright subsists.

56.   Mr. Sahni contributed tangible expression in the form of: (1) the photograph; (2) *The Starry Night* work; and (3) entering the variable inputs into RAGHAV, with the understanding that the output would be an original work. RAGHAV worked in unison with Mr. Sahni to input novel stylistic features based on Mr. Sahni's contributions into the development of the final work.

57. The result was SURYAST, a work which did not exist before. SURYAST is a tangible, fixed expression deserving of copyright protection. It is not a "merely mechanical exercise" as suggested by the Applicant.[32]

5) The Copyright Act Recognizes Non-Individuals as Owners of Rights Akin to Authorship (Cinematographic Works)

58. The Respondent acknowledges that under the *Copyright Act*, most cases start with the analysis of the substance of copyright with one or more individual authors and that the temporal scope of copyright protection in most cases is based on the lifespan of the author(s).

59. However, nowhere does the *Copyright Act* say that an author must be an individual.

60. Indeed, in respect of cinematographic works, the *Copyright Act* recognizes that copyright stems from a "maker" and the term of copyright is not dependent on a human's lifespan.

C. SURYAST Is an Original Work That Would Not Exist Without Mr. Sahni's or RAGHAV's Individual Contributions

1) RAGHAV Is Exercising Skill and Judgement

61. The *Copyright Act* was developed in a time where generative AI did not exist. The legislators could not have conceived of a time where computers could generate unique skill and judgement as a generative AI is now capable of doing, and indeed in the work of SURYAST, has done.

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[32] Applicant's Factum, *Samuelson-Glushko Canadian Internet Policy and Public Interest Clinic v Ankit Sahni*, FC File No T-1717-24, 26 June 2025 at para 9.

62.   RAGHAV is designed to be capable of learning "complex features like textures and patterns in subsequent layers."[33] This skill is then transposed using a technique called "neural style transfer"[34] which captures the semantic structure of styles[35] to extract "features of content and style"[36] and generate new stylizations and create a unique, distinct and disparate interpretation of the inputs.[37]

63.   The chosen sampling and expression of stylistic interpretation in the output are examples of RAGHAV's use of judgement in the skills learned from the inputs. RAGHAV is actively making decisions on colour combinations, use of brushstrokes, styling, shifts in tone, hue and shade, etc. in developing the final output.

2)   The Copyright Act Was Created to Protect Original Works Such as SURYAST

64.   The entire essence of the *Copyright Act* is to incentivize the creation of works which did not exist before by granting a time limited monopoly to the author(s) (or subsequent assignees of copyright), subject to balancing those rights with certain users' rights (e.g. fair dealing).

65.   Accepting an argument that the incorporation of AI in the creation of a work means that copyright cannot subsist in it would disincentivize the creation of new works in contrast to the intention of the *Copyright Act*.

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[33] Gupta, *Affidavit*, *supra* note 5 at para 11.
[34] *Ibid* at para 13.
[35] *Ibid* at para 20.
[36] *Ibid* at para 14.
[37] Sahni, *Affidavit*, *supra* note 1 at paras 12-13.

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66.   Recent news reports of musical works created entirely by AI being downloaded and enjoyed by large numbers of listeners[38] underscores that AI can create new works which are a benefit to Canadians.

67.   If copyright does not extend to works created in whole or in part using AI, one of the fundamental underpinnings of copyright law will be lost.

D. The Recognition/Attribution of the Contributions of AI in the Creation of Works is Recognized in Several Branches of the Canadian Legal and Regulatory System

68.   It bears mentioning that this Honourable Court and other branches of the Canadian Intellectual Property Office (notably the Registrar of Trademarks) have recently published guidelines for the use of AI in materials submitted to them.

69.   For example, in accordance with this Court's Amended Consolidated General Practice Guidelines (the Guidelines), parties are required to declare when AI has been used to generate or create content in documents prepared for the purposes of litigation and submitted to the Court.[39] The Guidelines also refer to this Court's Notice on the Use of Artificial Intelligence in Court Proceedings, which includes further information and specific requirements on counsel, parties, and interveners in legal proceedings at the Federal Court when using AI to prepare materials filed with the Court.[40] Failure to do so may result in consequences for parties and/or

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[38] David James, "This Band Has Millions of Streams on Spotify. The Only Problem — the Music and the Band Members Were Generated by AI" (14 July 2025), online: Entrepreneur <https://www.entrepreneur.com/business-news/ai-generated-band-velvet-sundown-has-millions-of-streams/494589>.

[39] Federal Court, *Amended Consolidated General Practice Guidelines* (20 June 2025), online: <https://www.fct-cf.ca/Content/assets/pdf/base/2025-06-20_Amended-Consolidated-General-Practice-Guidelines.pdf> at para 17.

[40] Federal Court, Notice To The Parties and The Profession - The Use of Artificial Intelligence in Court Proceedings (7 May 2024), online: <https://www.fct-cf.ca/Content/assets/pdf/base/FC-Updated-AI-Notice-EN.pdf>.

counsel, including the imposition of an adverse cost award or an order to show cause why the

party or counsel in question should not be held in contempt.

70.   Similarly, the Canadian Intellectual Property Office issued a practice notice titled

"Use of AI in proceedings before the Trademarks Opposition Board" (the "Practice Notice")

which provides guidance for submitting documents in proceedings before Trademarks

Opposition Board where AI is used to create or generate content in the document. The Practice

Notice states that a party in a proceeding under sections 11.13, 38, or 45 of the *Trademarks Act* is

expected to inform both the Trademarks Opposition Board and the opposite party if AI was used

to create or generate any content in a document filed with the Registrar of Trademarks.[41]

71.   While the Respondent appreciates that the focus of such practice directions is

directed to issues other than copyright, such practice directions recognize that authors of works,

such as lawyers and trademark agents, which create submissions and other works may use AI in

the creation of the documents which they file. The practice directions which require notification

that AI was used, while perhaps not changing that professional submitting the document must be

fully responsible for its contents, nonetheless recognizes that the individual professional

submitting the work is not the sole author of that work and attribution / recognition of AI is a

necessary disclosure.

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[41] Canada, Canadian Intellectual Property Office, "Use of AI in proceedings before the Trademarks Opposition Board" (4 June 2025), online: <https://ised-isde.canada.ca/site/canadian-intellectual-property-office/en/trademarks-opposition-board/use-ai-proceedings-trademarks-opposition-board>.

PART V – RELIEF SOUGHT

72.   The Respondent seeks:

    a. an Order:

        i.   Dismissing this application; and

        ii. Declaring the Respondent and RAGHAV to be the co-authors of SURYAST;

    b. in the alternative, if the Court finds that RAGHAV is not an author of SURYAST, the Respondent seeks an Order declaring the Respondent to be the sole author of SURYAST; and

    c. such further or other relief as this Honourable Court may deem just.

73.   For all of the foregoing reasons, the Respondent respectfully submits that the application for judicial review must be dismissed. As the Aplicant has not sought costs, the Respondent does not seek costs either.

ALL OF WHICH IS RESPECTFULLY SUBMITTED this **16ᵗʰ DAY OF JULY 2025**.

Jennifer Davidson
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Gary Daniel and Jennifer Davidson
Counsel for the Respondent

PART VI – LIST OF AUTHORITIES

Authority
Statutes and Regulations
Copyright Act, R.S.C., 1985, c. C-42
Industrial Designs Act, R.S.C., 1985, c. I-9
Patent Act, R.S.C., 1985, c. P-4
Trademarks Act, R.S.C., 1985, c. T-13
Caselaw
Bishop v Stevens, [1990] 2 SCR 467
Canadian Admiral Corporation Ltd v Rediffusion Inc, 1954 CanLII 712 (CA Ex Ct), [1954] Ex CR 382
Canada (Minister of Citizenship and Immigration) v Vavilov, 2019 SCC 65
Dunsmuir v New Brunswick, 2008 SCC 9
Théberge v Galerie d'Art du Petit Champlain Inc, 2002 SCC 34
Secondary Sources
Canada, Canadian Intellectual Property Office, "Use of AI in proceedings before the Trademarks Opposition Board" (4 June 2025)
Canada, Innovation, Science and Economic Development Canada, "Consultation paper: Consultation on Copyright in the Age of Generative Artificial Intelligence" (05 December 2024)
David James, "This Band Has Millions of Streams on Spotify. The Only Problem — the Music and the Band Members Were Generated by AI" (14 July 2025)
Federal Court, Amended Consolidated General Practice Guidelines (20 June 2025)
Federal Court, Notice To The Parties and The Profession - The Use of Artificial Intelligence in Court Proceedings (7 May 2024)