

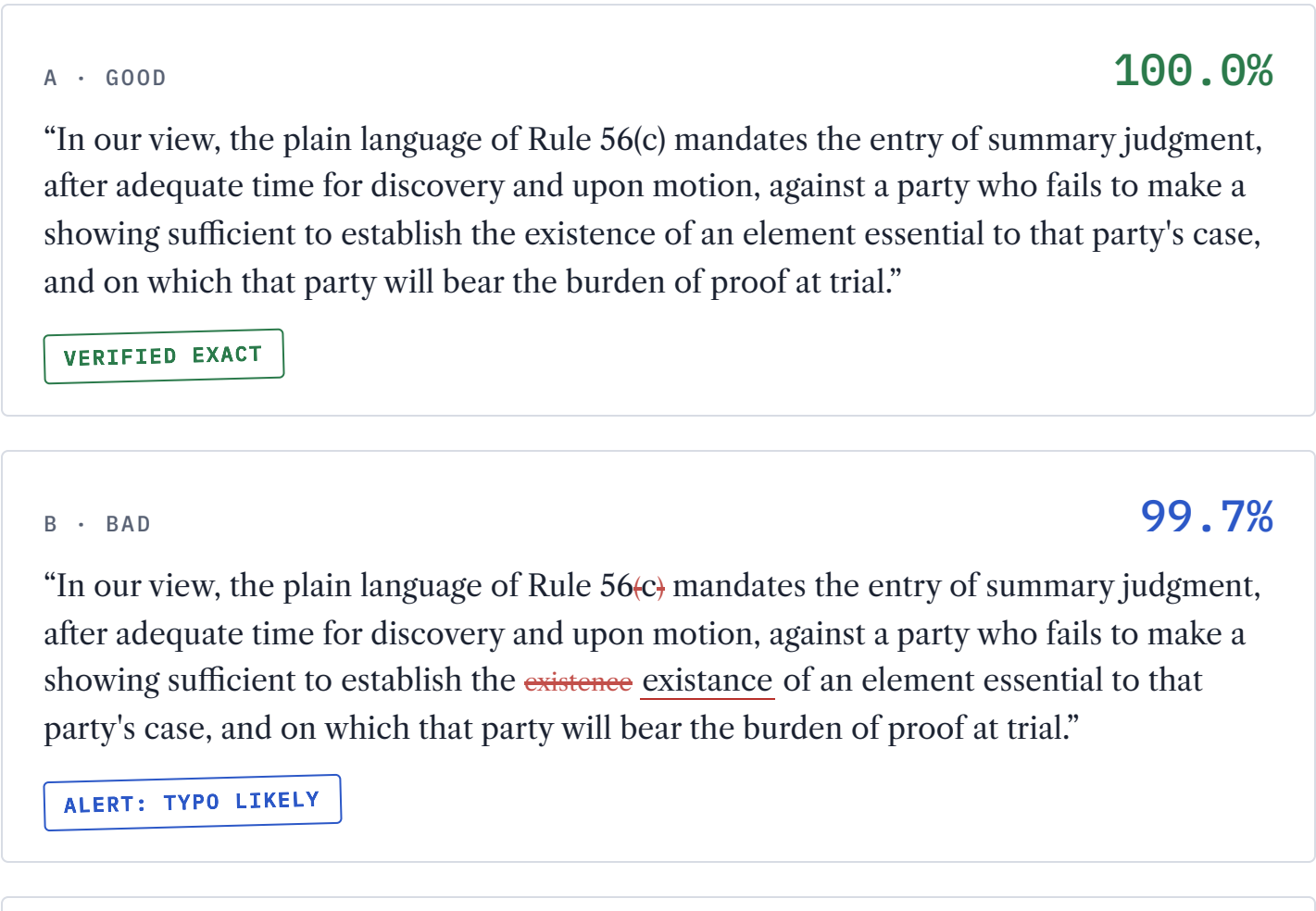
Adventures in LegalTech *QC*

Hallucinated cases get the headlines. The quieter danger is the quotation that is almost right. A deterministic checker against the full United States Reports catches all four kinds in under a second.

Richard Careaga October 2026 ≈ 6 min read

By now, we’ve all heard the horror stories about LLM hallucinations, but those only represent part of the problem. Outright fabrications are easy to spot. But don’t stop there. Consider these four quotes purportedly lifted from *Celotex Corp. v. Catrett*, 477 U.S. 317 (1986), a leading summary judgment case.

FIGURE 1 · FOUR QUOTATIONS, ONE SOURCE



C · UGLY

72.5%

“In our view, the ~~plain language~~ clear mandate of Rule 56(c) ~~mandates the~~ requires immediate entry of summary judgment, ~~after~~ without adequate time for discovery ~~and upon motion,~~ against ~~a~~ any party who fails to ~~make a showing sufficient to establish the existence of an element essential to that party's~~ prove their entire case, ~~and on which that party will bear the burden of proof at~~ before trial.”

ALERT: SUBSTANTIVE DISTORTION

D · NON-EXISTENT

0.0%

“Rule 56(c) was specifically enacted by Congress to eliminate frivolous toxic tort litigation prior to the empaneling of a jury.”

REJECT: NOT FOUND

inserted words not in the opinion ~~struck~~ words the opinion has but the quote dropped

Diffs computed against 477 U.S. at 322.

How we used to check

OLDEN TIMES

The bound volume

Pull the volume from the shelf, hope the pincite is correct, turn to the page and compare.

RECENT TIMES

The online service

Westlaw or similar: faster to find, still a human reading two texts side by side.

NOW

The bloody-minded script

Every quote scored against all 499,036 pages of the U.S. Reports. Same answer every time.

The first is easy. Have one junior associate read the passage aloud, pronouncing punctuation, while another reads from the brief. Checks.

Same for the second. Whoops! Missing parens: 56 c instead of 56(c) . Typo, not fatal, but embarrassing.

FIGURE 2 • THE READ-ALoud METHOD, QUOTE B

REPORTER	Rule	56	open paren	c	lower case	close paren	mandates
BRIEF	Rule	56	~~open paren~~	c	lower case	~~close paren~~	mandates

Two people, two texts, every mark spoken. It works, and it is the slowest way to find a missing pair of parentheses. Quote B also has *existence* for *existence*, which the ear will happily miss.

The third has strayed into plain error. Like a badly sleep-deprived lawyer, it has replaced what the Court actually said with what the lawyer wished it had said. Here is the real thing:

“In our view, the plain language of Rule 56(c) mandates the entry of summary judgment, after adequate time for discovery and upon motion, against a party who fails to make a showing sufficient to establish the existence of an element essential to that party’s case, and on which that party will bear the burden of proof at trial.”

That one is a bit harder because you have to spot the paragraph from which this was mangled.

And the fourth is the outright fabrication, not there at all. Like proving a negative, it takes more effort to demonstrate absence than presence.

As a thought experiment, give it a timed trial by giving the quotes to whoever would normally do this. Here’s the bogie.

FIGURE 3 • VERIFIER OUTPUT

```
=== STARTING POSTGRES-ANCHORED QUOTE VERIFIER ===
```

```
Test Case: GOOD (Exact)
```

```
Volume:    477 U.S. (Best Matched PDF Page: 354)
```

```
Score:     100.0% Match
```

```
Verdict:    [VERIFIED EXACT]
```

```
-----  
Test Case: BAD (Typo/Formatting)
```

```
Volume:    477 U.S. (Best Matched PDF Page: 354)
```

```
Score:     99.7% Match
```

```
Verdict:    [ALERT: TYPO LIKELY]
```

```
-----  
Test Case: UGLY (Distorted)
```

```
Volume:    477 U.S. (Best Matched PDF Page: 354)
```

```
Score:     72.5% Match
```

```
Verdict:    [ALERT: SUBSTANTIVE DISTORTION]
```

```
-----  
Test Case: NON-EXISTENT (Hallucination)
```

```
Volume:    477 U.S. (Best Matched PDF Page: None)
```

```
Score:     0.0% Match
```

```
Verdict:    [REJECT: NOT FOUND / HALLUCINATION]  
-----
```

Under one second, all four. “PDF page” is the page in the bound-volume file; the passage itself sits at 477 U.S. 322.

This takes under a second. That one second removes any possible excuse for not finding the error.

And it doesn’t require an expensive online service bureau subscription, doesn’t burn AI tokens, doesn’t need to be online, doesn’t need a local AI model and doesn’t even need an expensive high-powered server.

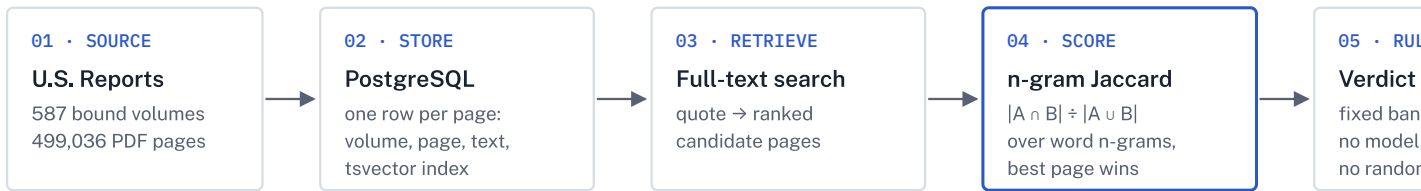
How I built it

Here’s how I did it, in a short AI-assisted session. Because I’ll be doing this again, I downloaded the entire United States Reports from the Supreme Court website: all 587 bound volumes, 499,036 pages.

I stuffed them into a local PostgreSQL database, along with the algorithmic

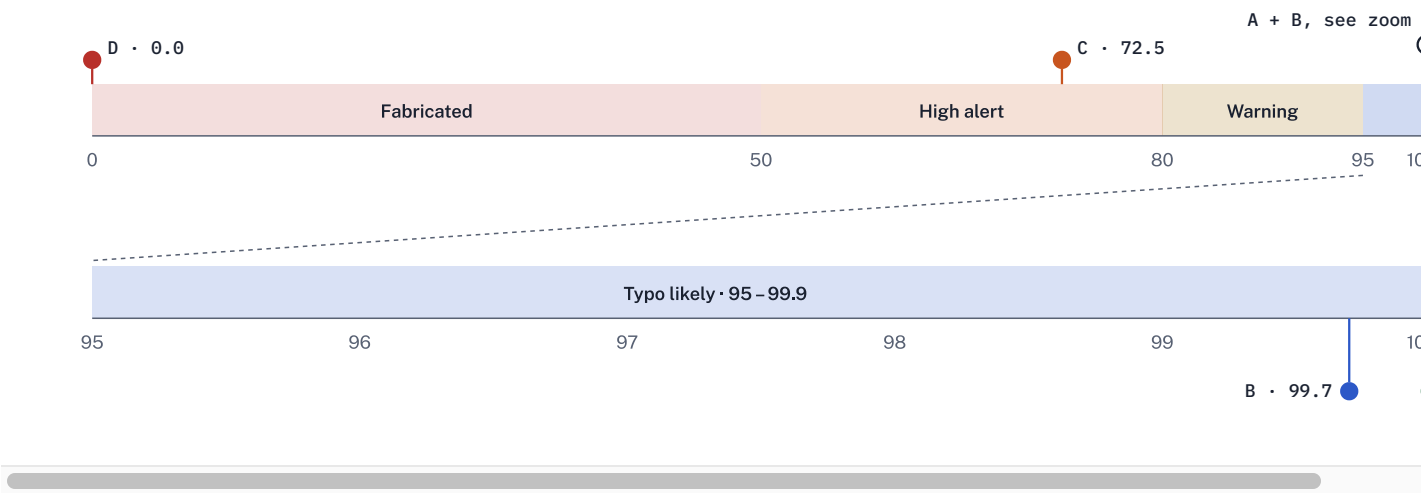
architecture behind fuzzy quote matching. Pairing PostgreSQL full-text search with word n-gram Jaccard filtering gives crisp, deterministic boundaries for citation auditing.

FIGURE 4 • THE PIPELINE



Steps 01–02 run once. Steps 03–05 run per quotation, offline, on ordinary hardware.

FIGURE 5 • WHERE THE FOUR QUOTES LAND



On a linear scale, the exact quote and the typo are nearly indistinguishable, which is exactly why a human misses them. The inset spreads 95–100% across the full width.

100%	Auto-verified. Exact verbatim match.
95 – 99.9%	Alert: typo likely. Minor punctuation shifts, missing parens, spelling typos.
80 – 94%	Warning. Noticeable phrasing alterations or word omissions.
50 – 79%	High alert. Paraphrased or substantively edited text.
< 50%	Fabricated or hallucinated citation.

The moral of the story

Bob Dylan closes *The Ballad of Frankie Lee and Judas Priest* (1967) with an explicit moral about knowing where you belong and not mistaking paradise for the home across the road. Look it up; it fits.

Two morals, actually.

- I. Proofing can be harder than writing, but it doesn't have to be for quotation verification.
- II. A tool that will produce the same result every time by being very bloody-minded is a good defense against the dark arts of stochastic large language models.

FOR LEGAL TRIVIA FANS

U.S.
1
Dall.

Volume 1 of the United States Reports (1 Dallas) contains zero U.S. Supreme Court decisions. Alexander Dallas was reporting decisions of Pennsylvania colonial and state courts starting in 1754, decades before the Court existed. When volume numbering was retroactively standardized, 1 Dallas simply became 1 U.S.

FOR AI ENTHUSIASTS

I used Gemini Flash to help code the underlying architecture. At some point it switched to writing in Euskera, the Basque language. I suppose it decided to be helpful based on my Basque surname. It went back to English after I explained that my paternal line predates the Basque presence in the Americas by about 10,000 years.

#LegalTech

#SoftwareEngineering

#PostgreSQL

#Python

#AI

#DatabaseDesign

#DataEngineering

