

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

MILTON ROBINSON TELETOR COJOM,

Plaintiff,

v.

ROBLEN, LLC f/d/b/a VICOLO PIZZA
RESTAURANT and VIKTOR BERISHA,

Defendants.

CIVIL ACTION NO.
3:23-CV-01669 (JCH)

**DECLARATION OF DAVID P. STICH, ESQ.
IN RESPONSE TO COURT'S ORDER TO SHOW CAUSE
FILED JULY 23, 2025**

DAVID P. STICH, an attorney duly admitted to this Court and to the Courts of the State of Connecticut, hereby declares:

1. I respectfully submit this Declaration to express my sincere and unreserved apology to the Court for the inclusion of non-existent legal citations in my Opposition to Defendants' Motion to Vacate. This was caused by my first time use of an AI tool.
2. I have been a practicing attorney for more than thirty years and fully understand the seriousness of this matter, as well as my professional obligation to provide accurate and verified legal authority in all filings submitted to the Court.
3. I was informed by colleagues that the use of AI tools can be highly effective in legal research and writing and can increase efficiency in practice.

4. The Opposition submitted on the motion to vacate was my first foray into the use of Descrybe.ai, or any AI tool.
5. While using the AI tool for research in the Opposition to the Motion to Vacate, I recognized several cases it referenced from my prior experience in other motions to vacate. That familiarity gave me a false sense of confidence in the AI tool's accuracy. I assumed that because cases matched my recognition or prior work, the remaining citations and summaries provided were also valid. I now realize that assumption was mistaken and deeply flawed.
6. I take full responsibility for this lapse. Regardless of any tools or technology used, it is my responsibility to ensure the accuracy and integrity of all materials presented to the Court.
7. I offer my sincerest apologies to the Court and my adversary. This mistake does not reflect the standards to which I have held myself for over three decades in the practice of law. I am committed to ensuring that this type of error does not recur and to maintaining the highest standards of accuracy, candor, and professionalism in my future conduct before this Court and others.

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

Executed this 1st day of August, 2025.



David P. Stich (ct18442)

CERTIFICATE OF SERVICE

I hereby certify that on the above date a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by email to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing. Parties may access this filing through the Court's system.



David P. Stich (ct18442)