

## Your New Litigation Associate: ChatGPT



Picture created by John Tredennick using Midjourney

By John Tredennick and William Webber

Lucille Brown is a new associate at Johnson and Smith, LLP. Orientation has completed and it is time for Ms. Brown's first assignment. Let's see how she does.

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### Memorandum

From: David Johnson: Partner, Johnson and Smith, LLP  
To: Lucille Brown, Associate  
Date: Tuesday, July 25, 2023 at 4:00 pm.  
Regarding: **Upcoming Depositions in the Bottled Water Matter**

Hello Lucille and welcome to the firm. We need your help right away.

Our client is a citizens group concerned about how Florida administrators are allowing private companies to extract water from the aquifer and sell it as bottled water. There



are concerns that the companies are depleting the aquifer, causing sinkholes to swallow homes and more.

We sent out this request for production: "All documents evidencing, reflecting or pertaining to the extraction of water in Florida for bottling by commercial enterprises." Depositions are not yet scheduled but we need to know who to depose from which companies and which government officials are involved in the decision making process. Ideally, we would like to know who is in whose pocket in this business.

We need your response ASAP, hopefully by the end of the week. Depositions start next Monday, July 31st.

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## Memorandum

From: Lucille Brown

To: David Johnson

Date: Tuesday, July 25, 2023 at 4:30 pm.

Regarding: **Upcoming Depositions in the Bottled Water Matter**

Based on the document summaries, several key individuals and companies have been identified that are involved in the extraction of water in Florida for bottling by commercial enterprises.

The companies that are frequently mentioned in the documents are Perrier and Nestle, specifically Great Nestle Waters of America ([Document 000381](#), [Document 065151](#), [Document 059464](#), [Document 048973](#), [Document 052941](#), [Document 128199](#)). These companies have been extracting water from various springs in Florida, including Crystal Springs and Madison Blue Springs.

In terms of individuals, Brad Willis, Vice President of Save our Springs, Inc., is a key figure who has been actively expressing concerns about the extraction of water in Florida for bottling by private companies ([Document 000381](#), [Document 065151](#), [Document 051585](#), [Document 060299](#), [Document 088496](#), [Document 076386](#), [Document 048973](#), [Document 052941](#), [Document 059629](#)). He has been communicating directly with Governor Jeb Bush about these issues.

Governor Jeb Bush is another key figure who has been involved in the decision-making process ([Document 054609](#), [Document 000381](#), [Document 066592](#), [Document 065151](#),

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[Document 059464](#), [Document 051585](#), [Document 060299](#), [Document 088496](#), [Document 059487](#), [Document 124225](#), [Document 076386](#), [Document 059848](#), [Document 048973](#), [Document 052941](#), [Document 175955](#), [Document 055529](#), [Document 059490](#), [Document 030512](#), [Document 145821](#), [Document 068029](#), [Document 145620](#), [Document 053518](#), [Document 059629](#), [Document 149274](#), [Document 055702](#), [Document 059490](#), [Document 032646](#), [Document 140281](#), [Document 064781](#)). He has received numerous emails from concerned citizens and organizations about the extraction of water in Florida for bottling by commercial enterprises.

Raymond Ludwig, Brad Willis, Virginia Seacrist, Paul A. O'Byrne, Lynn McGarvey, Teresa L. Weaver, and John Nowlen are among the citizens who have expressed their concerns directly to Governor Bush ([Document 054609](#), [Document 000381](#), [Document 066592](#), [Document 065151](#), [Document 059464](#), [Document 059487](#), [Document 124225](#), [Document 055529](#)).

M. Lane Stephens, a governmental consultant for Perrier, has been in communication with Governor Bush, expressing Perrier's concern about water conservation and their desire to be more involved in addressing the water shortage in Florida ([Document 069160](#)).

In terms of government officials, David Struhs and Bob Sparks have been mentioned in the documents ([Document 066592](#), [Document 145821](#), [Document 001625](#)).

In terms of potential corruption or "who is in whose pocket", there are several documents that suggest a close relationship between the companies extracting water and the government officials. For example, M. Lane Stephens, a governmental consultant for Perrier, has been in communication with Governor Bush, expressing Perrier's concern about water conservation and their desire to be more involved in addressing the water shortage in Florida ([Document 069160](#)).

In another document, Denver Stutler, Mike Joyner, and Jeb Bush discuss the extraction of water from Silver Springs in Florida. Stutler forwards an email from Teresa Weaver to Governor Jeb Bush, expressing concern about the pumping and selling of water from Silver Springs. Joyner provides an explanation that no one is pumping from Silver Springs directly, but rather a company called Dickson Trust has a permit to extract water from nearby wells owned by Silver Springs Regional Water Inc. Joyner also mentions that Dickson Trust pays a monthly removal fee to the county ([Document 145821](#)).

These documents suggest that there may be a close relationship between the companies extracting water and the government officials, which could be a potential area of investigation for the firm.



In terms of a timeline, the documents span from 1999 to 2006, with the majority of the documents dated in the early 2000s. This suggests that the extraction of water in Florida for bottling by commercial enterprises has been a concern for at least a decade.

I hope this information is helpful for your case. Please let me know if you need further assistance.

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### Memorandum

From: David Johnson  
To: Lucille Brown  
Date: Tuesday, July 25, 2023 at 4:45 pm.  
Regarding: **Upcoming Depositions in the Bottled Water Matter**

Thanks for your quick response.

Who should we depose and why? What topics should we cover and what documents should I include for each?

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### Memorandum

From: Lucille Brown  
To: David Johnson  
Date: Tuesday, July 25, 2023 at 5:00 pm.  
Regarding: **Upcoming Depositions in the Bottled Water Matter**

Based on the document summaries, here are some suggestions for depositions:



Based on the document summaries, here are some suggestions for depositions:

1. **Brad Willis, Vice President of Save our Springs, Inc.** ([Document 000381](#), [Document 065151](#), [Document 051585](#), [Document 060299](#), [Document 088496](#), [Document 076386](#), [Document 048973](#), [Document 052941](#), [Document 059629](#)): Willis has been actively expressing concerns about the extraction of water in Florida for bottling by private companies. He has communicated directly with Governor Jeb Bush about these issues. Topics to cover could include his knowledge of the companies involved, the impact on the environment, and any interactions or communications he has had with government officials.

2. **Governor Jeb Bush** ([Document 054609](#), [Document 000381](#), [Document 066592](#), [Document 065151](#), [Document 059464](#), [Document 051585](#), [Document 060299](#), [Document 088496](#), [Document 059487](#), [Document 124225](#), [Document 076386](#), [Document 059848](#), [Document 048973](#), [Document 052941](#), [Document 175955](#), [Document 055529](#), [Document 059490](#), [Document 030512](#), [Document 145821](#), [Document 068029](#), [Document 145620](#), [Document 053518](#), [Document 059629](#), [Document 149274](#), [Document 055702](#), [Document 059490](#), [Document 032646](#), [Document 140281](#), [Document 064781](#)): As the governor during the time these issues were raised, Bush would have knowledge of the decision-making process and any potential influence from the companies involved. Topics to cover could include his knowledge of the companies involved, any communications or interactions he has had with these companies, and the decision-making process regarding the extraction of water.

3. **Representatives from Perrier and Nestle** ([Document 000381](#), [Document 065151](#), [Document 059464](#), [Document 048973](#), [Document 052941](#), [Document 128199](#)): These companies have been extracting water from various springs in Florida. Topics to cover could include their extraction practices, any communications or interactions they have had with government officials, and their response to concerns about the depletion of the aquifer.

4. **M. Lane Stephens, a governmental consultant for Perrier** ([Document 069160](#)): Stephens has been in communication with Governor Bush, expressing Perrier's concern about water conservation and their desire to be more involved in addressing the water shortage in Florida. Topics to cover could include his role as a consultant, his communications with Governor Bush, and any knowledge he has about Perrier's extraction practices and interactions with government officials.

5. **David Struhs and Bob Sparks** ([Document 066592](#), [Document 145821](#), [Document 001625](#)): These government officials have been mentioned in the documents and may have knowledge about the decision-making process and any potential influence from the companies involved. Topics to cover could include their role in the decision-making



process, any communications or interactions they have had with the companies involved, and their response to concerns about the depletion of the aquifer.

For each deposition, you should include the relevant documents that mention the individual or company. These documents provide evidence of their involvement in the extraction of water in Florida for bottling by commercial enterprises and their knowledge of the concerns raised by citizens and organizations.

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### **A Real Life Story?**

Not yet, but soon enough. You have correctly deduced that the associate is GPT 4.0. In real life, the project might take several days to complete with a (really smart) human associate doing the work. At a billing rate of \$500 an hour, the associate's analysis might cost \$10,000 or more .

With GPT and our B2 system, the actual process completed in minutes. My hypothetical associate actually held off sending the response to give the appearance of being hard at work. The whole project cost about \$1.00 in LLM costs.

Is this a real life story? It will be in the near future. Integrated systems like B2 (our internal lab name) can do the following in minutes rather than hours or days:

1. Review and analyze the memo text (in exactly the form presented above);
2. Create a search across the 290,000 Bush emails in our lab test set;
3. Run the search, identifying the 1,000 most likely relevant documents (this is configurable);
4. Summarize all 1,000 documents based on the topic request;
5. Rank all 1,000 documents based on likely relevance (0 to 10);
6. Sort the document summaries in relevance order, top to bottom;
7. Send the document summaries to GPT to use for its analysis;
8. Receive GPT's analysis complete with live links to the summaries and original emails.

Welcome to a new era of Discovery. It's a world where we can seamlessly transition from search hits to discovery answers, thanks to the extraordinary capabilities of AI.

By seamlessly integrating an LLM with an algorithmic search engine like Sherlock, legal professionals can harness the immense capabilities of large language models to

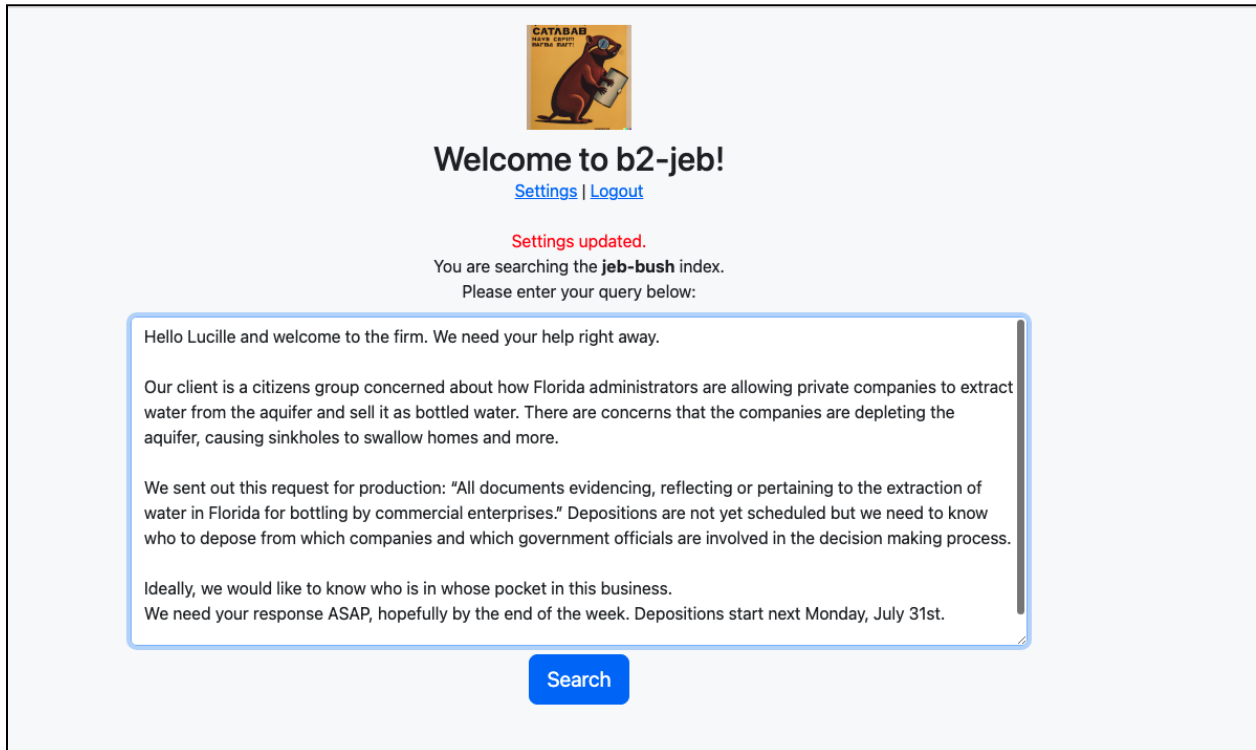
streamline discovery processes and quickly dive deeper into the key documents that are most relevant for the case.

## Appendix

If you want to see the process behind the scenes, here are screenshots from B2 for the discussion we had on the Bottled Water Case.

### The Initial Question

We inserted the following prompt into B2:



The screenshot shows a web interface for 'b2-jeb!'. At the top center is a logo for 'CATABAB' featuring a brown bear wearing sunglasses and holding a document. Below the logo, the text reads 'Welcome to b2-jeb!' with links for 'Settings' and 'Logout'. A red notification says 'Settings updated.' Below that, it states 'You are searching the jeb-bush index. Please enter your query below:'. A large text box contains the following text: 'Hello Lucille and welcome to the firm. We need your help right away. Our client is a citizens group concerned about how Florida administrators are allowing private companies to extract water from the aquifer and sell it as bottled water. There are concerns that the companies are depleting the aquifer, causing sinkholes to swallow homes and more. We sent out this request for production: "All documents evidencing, reflecting or pertaining to the extraction of water in Florida for bottling by commercial enterprises." Depositions are not yet scheduled but we need to know who to depose from which companies and which government officials are involved in the decision making process. Ideally, we would like to know who is in whose pocket in this business. We need your response ASAP, hopefully by the end of the week. Depositions start next Monday, July 31st.' Below the text box is a blue 'Search' button.

The beauty of these LLMs is that you don't have to learn specific syntax or language in order to communicate with GPT. Just enter your request as you might working with a human associate.

### Finding and Summarizing 300 Documents





In this case, we asked B2 to find and analyze the top 300 relevant documents. The process of doing so took about three minutes. Compare that to the alternative with human associates doing the research and analysis.

Click on any summary to view its contents. Or open all of them with a click.

### Viewing the Summaries

Here are views of the top two summaries prepared by B2.





| 300 hits ( <a href="#">toggle summaries</a> )  |  |        |
|--|--|--------|
| Id: 054609   | Concerns about Private Profit and Depletion of Aquifer in Florida <a href="#">toggle summary</a>  | Rel: 9 |
| <p>The document is an email sent by Raymond Ludwig to Governor Jeb Bush, expressing concern about the water problem in Florida. Ludwig is worried about the pumping of natural springs for private profit and the depletion of the aquifer. He specifically mentions Perrier's pumping from Crystal Springs and their refusal to decrease pumping even during droughts. Ludwig also mentions Blue Springs being up for sale and the need for the state to intervene to prevent further worsening of the situation. He asks for Governor Bush's help in addressing these issues. The email was sent on June 8, 2000, and the main people involved are Raymond Ludwig and Governor Jeb Bush.</p> <p><a href="#">toggle text</a> </p>  |  |        |
| Id: 000381   | [There was an error in generating the title] <a href="#">toggle summary</a>                       | Rel: 9 |
| <p>The document is an email from Brad Willis, Vice President of Save our Springs, Inc., to Governor Jeb Bush, expressing concerns about the extraction of water in Florida for bottling by private companies. Willis specifically mentions Nestle (Great Nestle Waters of America) and their documented damages to national springs. He questions why these companies are not required to pay royalties to the state and be closely monitored in their activities. Willis also criticizes the Southwest Florida Water Management District (SWFWMD) for allowing Nestle to truck in water from another source to increase their permit at Crystal Springs. He argues that foreign corporations should not have so much control over local resources like fresh water and suggests that these companies should pay royalties and finance water restoration and environmental programs. Willis emphasizes the need to guard Florida's resources and preserve natural land. The email was sent on January 17, 2003, and the main people involved are Brad Willis and Governor Jeb Bush.</p> <p><a href="#">toggle text</a> </p> |  |        |

### Linking to the Underlying Emails

We can review the actual email text for each of the summaries.



|   |   |        |
|---|---|--------|
| Id:<br>054609   | Concerns about Private Profit and Depletion of<br>Aquifer in Florida <a href="#">toggle summary</a>  | Rel: 9 |
| <p>The document is an email sent by Raymond Ludwig to Governor Jeb Bush, expressing concern about the water problem in Florida. Ludwig is worried about the pumping of natural springs for private profit and the depletion of the aquifer. He specifically mentions Perrier's pumping from Crystal Springs and their refusal to decrease pumping even during droughts. Ludwig also mentions Blue Springs being up for sale and the need for the state to intervene to prevent further worsening of the situation. He asks for Governor Bush's help in addressing these issues. The email was sent on June 8, 2000, and the main people involved are Raymond Ludwig and Governor Jeb Bush.</p> <p><a href="#">toggle text</a> </p> |   |        |
| <p>From: RLu1514033@aol.com<br/>Sent: Thursday, June 8, 2000 5:46 PM<br/>To: Jeb@jeb.org<br/>Cc: RLu1514033@aol.com<br/>Subject: (no subject)</p>   |   |        |
| <p>Hello Governor Bush,<br/>I am sending this letter in regard to the terrible and quite terrifying water problem that we have here in the state of Florida. I have been a citizen of this state almost all my life and I never thought I would see the day when I would have to worry about my well running dry. Why is the state allowing the pumping of our, the people's natural springs, for private profit? The florida aquifer is for everybody, not for a big corporation to steal it for private profit. I can't</p>   |   |        |

## GPT's Analysis

After finding, summarizing and ranking the top 300 documents, GPT chooses the top fifty or sixty of them and starts providing its analysis.



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In terms of individuals, Brad Willis, Vice President of Save our Springs, Inc., is a key figure who has been actively expressing concerns about the extraction of water in Florida for bottling by private companies ([Document 000381](#), [Document 065151](#), [Document 051585](#), [Document 060299](#), [Document 088496](#), [Document 076386](#), [Document 048973](#), [Document 052941](#), [Document 059629](#)). He has been communicating directly with Governor Jeb Bush about these issues.

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M. Lane Stephens, a governmental consultant for Perrier, has been in communication with Governor Bush, expressing Perrier's concern about water conservation and their desire to be more involved in addressing the water shortage in Florida ([Document 069160](#)).

## Our Further Question

And here is GPT's response to our last question:



Based on the document summaries, here are some suggestions for depositions:

1. **Brad Willis, Vice President of Save our Springs, Inc.** ([Document 000381](#), [Document 065151](#), [Document 051585](#), [Document 060299](#), [Document 088496](#), [Document 076386](#), [Document 048973](#), [Document 052941](#), [Document 059629](#)): Willis has been actively expressing concerns about the extraction of water in Florida for bottling by private companies. He has communicated directly with Governor Jeb Bush about these issues. Topics to cover could include his knowledge of the companies involved, the impact on the environment, and any interactions or communications he has had with government officials.
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## About the Authors

John Tredennick (JT@Merlin.Tech) is the CEO and founder of Merlin Search Technologies, a cloud technology company that has developed a revolutionary new machine learning search algorithm called Sherlock® to help people find information in large document sets—without having to master keyword search.

Tredennick began his career as a trial lawyer and litigation partner at a national law firm. In 2000, he founded and served as CEO of Catalyst, an international e-discovery search technology company that was sold to a large public company in 2019. Over the past four decades he has written or edited eight books and countless articles on legal technology topics, spoken on five continents and served as Chair of the ABA's Law Practice Management Section.



**Dr. William Webber** (wwebber@Merlin.Tech) is the Chief Data Scientist of Merlin Search Technologies. He completed his PhD in Measurement in Information Retrieval Evaluation at the University of Melbourne under Professors Alistair Moffat and Justin Zobel, and his post-doctoral research at the E-Discovery Lab of the University of Maryland under Professor Doug Oard.

With over 30 peer-reviewed scientific publications in the areas of information retrieval, statistical evaluation, and machine learning, he is a world expert in AI and statistical measurement for information retrieval and ediscovery. He has almost a decade of industry experience as a consulting data scientist to ediscovery software vendors, service providers, and law firms.

### **About Merlin Search Technologies**

Merlin is a pioneering cloud technology firm, specializing in developing and hosting AI-driven software for search investigations and review. With over twenty years of experience, our team has built and hosted discovery platforms for many of the largest corporations and law firms in the world.

We've built a next-generation search platform, integrating machine learning algorithms with keywords to make it quicker, easier and less costly to find information in large document sets. And introduced Cloud Utility Pricing to save on hosting.

Our mission is to use AI and cloud technologies to make search, investigations and discovery efficient and cost effective.