



SALT RIVER PIMA-MARICOPA INDIAN COMMUNITY
COURT OF APPEALS
10,005 E. OSBORN RD. SCOTTSDALE, AZ 85256 (480)362.6315

SALT RIVER TRIBAL COURT
FILED 2026 JUN 11 PM 8:10

MB

MOOHITH KOOKATLA,

Appellant,

-v-

**RACHELLE LEORA GATES, and
JOANELLE LEVONNE GATES, and
ALEXANDER APODACA,**

Appellees.

Appeal Case No.: **AP-26-0005**
(Trial Case No.: CV25-5125)

**ORDER GRANTING
MOTION TO DISMISS**

Before, JUDITH DWORKIN, JOSHUA REES AND MARY GUSS, Justices of the SRPMIC Court of Appeals.

This matter comes to us on the Appellees' *Joint Motion to Dismiss or Extend Time to File Responsive Briefs*, filed by counsel for Rachelle Leora Gates, Joanelle Levonne Gates, and Alexander Apodaca on June 3, 2026 ("Motion to Dismiss"). In their Motion to Dismiss the Appellees argue that the appeal should be dismissed as there are numerous instances where the Appellant's Principal Brief contains citations to cases that do not exist, do not contain the language quoted or stand for the proposition for which it is cited. Having reviewed several of the cases the Court found Appellees' assertion likely to be accurate.

This Court held a Show Cause Hearing on June 10, 2026, and heard testimony and arguments from the Appellant's legal counsel, Sai Manthra, why this appeal should not be dismissed. Mr. Mantha admitted that he, or members of his staff, used artificial intelligence ("AI") to assist in drafting the brief. He blames AI for citing nonexistent cases and the other hallucinations found throughout the brief. He takes responsibility for not independently verifying all the citations in the Principal Brief. Mr. Mantha provided no legal argument as to why this appeal should not be dismissed but asks for the mercy of the Court to allow him to file an Amended Principal Brief.

In practicing in the courts of the Salt River Pima-Maricopa Indian Community ("SRPMIC"), Mr. Mantha is bound by SRPMIC Court Rules of Professional Conduct ("RPC"). While the act of using AI to assist in drafting his client's Principal Brief arguably did not violate

the RPC, the fact that he filed a Principal Brief that cites to cases that do not exist, do not contain the language quoted, or stand for the proposition for which it is cited, does violate the RPC. Specifically, RPC Section XV.A.1 provides that an attorney shall not make a false statement of material fact or law to the Court. By admitting to the Court that he filed a brief that provided citations to cases that do not exist, do not contain the language quoted, or stand for the proposition for which it is cited, he admitted to violation of RPC Section XV.A.1.

This Court does not take this situation lightly. Mr. Manthra pleads for mercy. The Court does not have any confidence that if it granted mercy, that Mr. Manthra would provide a brief that could be trusted. On May 18, more than two (2) weeks after the Principal Brief was filed, Appellant's filed a Motion for Leave to File an Amended Principal Brief. The Amended Principal Brief continued to include at least one hallucination case as well as several cases that were miscited. As such, this Court has no choice but to GRANT the Appellees' Motion to Dismiss with PREJUDICE, for the violation of RPC Section XV.A.1. by Appellant's legal counsel.

SO ORDERED this 10th day of June, 2026.

IT IS SO ORDERED.

ISSUED this 11th day of June, 2026.



Electronically approved 6/10/2026

/s/ Judith M. Dworkin
Judith M. Dworkin, **Justice**

Electronically approved 6/10/2026

/s/ Joshua O. Rees
Joshua O. Rees, **Justice**

Electronically approved 6/10/2026

/s/ Mary Guss
Mary Guss, **Justice**