

Meeting Minutes
Utah Supreme Court’s Ad Hoc Committee on Regulatory
Reform AI/Legal Tech Meeting Minutes
Friday, March 20, 2026
12:00 – 1:00
Hybrid

The group approved the minutes from the previous meeting.

The group next discussed the Committee’s recent presentation to the Utah Supreme Court regarding the interim report.

- The group noted that, based on that discussion, the Court appeared interested in further exploration of possible unauthorized-practice-of-law carveouts in the AI context and also appeared open to the use of disclaimers as part of any such approach.
- The group also briefly discussed the current Rule 5.4 landscape and observed that the broader regulatory environment remains mixed and unsettled.
- Members noted recent litigation involving OpenAI and agreed that related articles should be circulated to the group.

The workgroup then heard from special guest Ransom Wydner of SixFifty.

- The discussion focused on SixFifty’s experience operating outside the Sandbox and the ways organizations attempt to reduce UPL risk through disclosures and disclaimers.
- Ransom explained that many organizations offering legal-adjacent tools rely on a similar set of disclosures, including:
 - That the tool provides information, not legal advice;
 - That AI can make mistakes; and
 - That no attorney–client relationship is being formed.
- He also discussed the use of retrieval-augmented generation (RAG) systems, describing them as a way to improve reliability by limiting responses to a defined body of source material and providing users with the underlying sources.
- The discussion also addressed the difficulty organizations face in navigating current UPL rules, particularly where tools draft documents, automate forms, or apply legal principles to user-provided facts. It could be helpful to change or add definitions, such as what it

means to draft a document and what it means to apply law to facts. Those are two things that deter organizations from using (or developing) AI tools.

- Ransom noted that uncertainty in these areas may discourage some organizations from offering tools that could improve access to justice, even where the practical risk of enforcement appears low. Legal services organizations, funded by LSC or otherwise, need more tools to serve more people but are particularly risk averse, even if the risk of enforcement or ancillary litigation is low.
- The discussion suggested that the greatest concern for many organizations is not necessarily direct enforcement by regulators, but broader legal and business risk, including litigation, insurance, and reputational concerns.
- The group discussed whether users generally understand what they are receiving from AI-enabled legal tools, which suggested that consumer confusion may arise less from users believing they are speaking to an attorney, and more from users not understanding when they may need legal advice in the first place.
- The group also discussed concerns about lower-quality AI tools, public distrust of AI, and the need to compare AI-enabled tools not to ideal legal representation, but to the current alternatives available to many users, including no help at all.
- The group also discussed whether additional clarity in Utah's UPL framework could encourage more organizations to operate with confidence. Ransom suggested that clearer definitions around activities such as document drafting and applying legal principles to specific facts could be more helpful than narrow carveouts alone. The discussion further noted that any Utah-specific change might have limited immediate effect on nationally operating entities, but could still be meaningful for Utah-focused organizations and could also continue to position Utah as an influential jurisdiction in this area.

In closing, the workgroup discussed next steps for future drafting.

- The group agreed that it would be useful to begin redlining what a possible carveout might look like, while also considering an alternative approach that would identify what does not constitute the practice of law in this context. The group also discussed developing a rubric or similar guidance to help companies understand how they may safely operate without crossing into UPL. The group agreed to consider both a possible rule-based carveout and a possible standing-order approach at a future meeting.

Action Items

- Redlining what a rule could look like
- Consider creating rubric of what is not practice of law
 - Guide companies on how they can safely operate
 - The definition of AI could change in a year
- Consider what a carve-out might look like and what a standing order may look like