Adjusting the Temperature – LLMs and Property Tax Law

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1. Introduction

The rapid development of large language models (LLMs) has created both opportunities and ethical challenges for legal practitioners. This paper adapts material from a presentation delivered at the IAAO 2025 Law Institute, focusing on the intersection of LLM technology, legal ethics, and property tax law. It explores how tools such as ChatGPT and other generative AI systems have evolved, how lawyers might integrate them into their practice, and the professional obligations that their use implicates.

Why is this topic important to me? As a tax attorney, I understand that numbers — and the conclusions they drive — have to be right. Today's LLMs aren't yet fully reliable for our purposes, but they are getting closer every day.

In another life, I've been a serial entrepreneur, selling everything from hedgeapple fruit to home décor, all online. Some of the ventures succeeded — most did not — but each taught me something about innovation and adaptation. I am a Jayhawker living in Lawrence, Kansas.[1]

2. Evolution of Large Language Models

On November 30, 2022, OpenAI released ChatGPT 3.5, followed by ChatGPT 4.0 on March 14, 2023. The transition between these versions marked a significant leap in the model's ability to reason through legal and financial problems.

[1] The birthplace of the Python web framework Django, which has fostered a vibrant local community of Python developers. PyTorch, an open-source library used primarily in Python, has become one of the leading tools for training and developing LLMs.

When I presented ChatGPT 3.5, with an income capitalization scenario involving a buyer with $6 million dollars on hand wanting to buy a business with net operating income of $100,000 and a capitalization rate of 13.5%, ChatGPT 3.5 calculated the business value correctly but failed to evaluate whether the buyer's available funds were sufficient to make the purchase. ChatGPT 4.0, in contrast, correctly identified that $6 million in cash as being more than sufficient to purchase a $740,740.74 business, demonstrating an emerging capacity for second-order reasoning--Or maybe the model was just lucky on that inference run.

Since 2024, new LLM tools have proliferated. Closed-source models include OpenAI's ChatGPT, Anthropic's Claude, Grok (developed by X, formerly Twitter), and Google's Gemini. Meanwhile, open-source and open-weight models, such as Meta's Llama, DeepSeek, and Qwen, offer more flexibility and local control. Although these models are often described as 'artificial intelligence,' they are fundamentally large statistical systems trained to predict the next word in a sequence using transformer architectures.

3. ABA Formal Opinion 512 and State Supreme Court Rules

On July 29, 2024, the ABA Standing Committee on Ethics and Professional Responsibility issued Formal Opinion 512.[2] This opinion provides a roadmap for understanding how existing rules of professional conduct apply when lawyers use LLMs. Many states' supreme courts have begun to issue policies and rules addressing similar concerns. Examples include Arizona (Ariz. Admin. Code § 1-509), Delaware (Del. Sup. Ct. Appendix O-1), Illinois (Ill. Policy on AI, Pa Interim Policy on Generative AI), and California (Cal. Task Force Recommendations Item No. 25-10).

4. Key Concepts and Definitions

A **Neural Net** is a web of digital nodes modeled loosely on brain cells, designed to recognize and connect patterns in language. A **Large Language Model** (LLM) uses billions of parameters to predict the next word in a sequence. Training involves feeding massive text corpora into the model to generate embeddings—mathematical representations of meaning[3]—that allow the model to understand relationships between tokens. Throughout this document, the term "LLM" may also be referred to as a "GAI"[4] or "model."

-- Think of a neural network as a massive appraisal grid. Each "node" is like a property characteristic in a mass appraisal model—square footage, construction quality,

[2] https://www.americanbar.org/content/dam/aba/administrative/professional_responsibility/ethics-opinions/aba-formal-opinion-512.pdf (last visited Oct. 8, 2025).

[33] As the model in increases in scale—through more embeddings and parameters—the statistical mapping of token relationships produces emergent linguistic and conception behavior. The benefits of scale were a surprise to many.

[4] In Federal and state ethical groups, the common practice is to refer to a LLM as a GAI – generative artificial intelligence. The context of this paper deals with LLM and doesn't address other types of GAI – diffusion models.

neighborhood factor, depreciation table, etc. But instead of appraisers deciding the weights, the network learns them by examining millions of "sales"—in this case, sentences and words. The same way a valuation model learns how each attribute affects price through regression, the neural net adjusts its internal weights through repeated exposure to data, until it can "predict" a property's value—or in this case, the next word—based on the patterns it has internalized.

Inference refers to the stage when a trained model generates outputs — such as words, sentences, or entire documents — based on new input it has never seen before. It is the application phase, where the model draws upon the statistical relationships it learned during training. Inference is what the normal person will deal with 99% of the time, is cheaper to provide (unless you have millions of dollars and access to a great deal of GPUs)

-- Inference is like the mass appraisal season that follows the long winter of building your cost tables and depreciation schedules. Training is the heavy lift — gathering sales data, cleaning up the outliers, testing the regression model, and getting your cost schedules to line up with reality. Inference happens when you have a new house to value as of January 1, and you apply those calibrated tables to value it. You're not rebuilding the model each time — you're relying on what you already learned from all the prior sales and valuation methods. When you do it right, the process is quick and defensible. But if your training data are off—say, a few bad sales slipped through—your inferences will be off too, no matter how confident the number looks. Remember, the LLM always presents its answers confidently, whether the response is right or wrong.

Hallucination occurs when an LLM generates fluent but factually inaccurate or fabricated responses.

-- Hallucination is what happens when an appraiser is forced to value a unique property with no relevant sales, and instead of saying "insufficient data," they confidently assign a value anyway. The number looks official, the report reads smoothly—but the comps are made up or misapplied.

- When the model's Temperature is turned up, this tendency for Hallucination increases—like an appraiser told to "be creative" when the data are thin. Instead of narrowing to the most defensible range, they start experimenting with unusual adjustments or speculative comparables. The result may sound plausible, even insightful, but it's statistically less reliable by design; the LLM has been instructed to wander farther from the data (peak of probability distribution) to fill the gaps.

Temperature is a setting that controls how predictable or creative the model's answers will be: lower temperatures produce more consistent responses, while higher temperatures increase creativity but also the likelihood of hallucination.

- At a low Temperature, you're only allowing a narrow price-per-square-foot band, just like a cautious appraiser who excludes any sale that's even hair outside the norm. There may be no comparables that meet the criteria in the geographic region. At high

temperature, you're throwing in that quirky house with a pool shaped like a fiddle and a three-story barn because "it might tell us something." Sometimes it does—but it can also pull the average somewhere crazy if you're not careful.

Bias and Fairness issues arise because AI systems learn from existing data, potentially reflecting or amplifying societal biases.

- Bias in AI is no different from discovering that your cost tables undervalue rural homes or overvalue older urban stock because they were built from non-representative sales. If your training data reflects past inequities, your model perpetuates them.

Alignment refers to efforts to ensure that AI behavior is consistent with human values and legal norms.

-- Alignment is like ensuring that your county valuation practices follow Kansas constitutional uniformity clauses, statutory definitions of "fair market value," and your state's tax and appellate court precedent. The model may be powerful, but unless it's constrained to behave consistently with legal norms, it can go off in directions that are technically clever but legally unsound.

Sycophancy in the LLM context means the LLM will generate responses in inference that users want, rather than the most accurate, objectively true answer/response.

-- This is akin to an expert witness shading opinions to please the hiring attorney instead of sticking strictly to an expert opinion on an objective record. Another example, a fee appraiser places more emphasis on a cost approach when there are identical comparable sales in the neighborhood, because the buyer wants to haggle down the price.

We will return to these eight technical terms as we work through the legal ethics rules.

5. Ethical Duties Implicated by LLM Use

Several core duties are implicated using LLMs in legal practice. This paper draws from the American Bar Association's Model Rules of Professional Conduct, specifically the duty of competence (ABA Model Rule 1.1), confidentiality of information (Rule 1.6), supervision of subordinates and nonlawyers (Rules 5.1 and 5.3), the prohibition on unauthorized practice of law (Rule 5.5), and the duty of candor and truthfulness (Rules 3.3 and 4.1). You are encouraged to compare the ABA Rules with your State's respective ethical rules.[5]Many states' supreme

[5] This paper will also set out comparable rules for the ABA Model Rules of Professional Conduct (MR), Arizona Rules of Professional Conduct (ER), California Rules of Professional Conduct (CRPC), Kansas Rules of Professional Conduct (KRPC), New York Rules of Professional Conduct (NYRPC), and Texas Disciplinary Rules of Professional Conduct (TDRPC).

courts have launched GAI advisory groups to evaluate risk, opportunities, and to protect the public's trust in the legal profession:

1. GAI and the Courts Workgroup, Report and Recommendations (Mich. Sup. Ct. 2024).[6]
2. Artificial Intelligence and Georgia Courts, June 2025;[7]

6. ABA Model Rule 1.1 – Competence

> A lawyer shall provide competent representation to a client. Competent representation requires legal knowledge, skill, thoroughness and preparation reasonably necessary for the representation.[8]

In 2012, the ABA added a comment clarifying an attorney's duty:[9]

> To maintain the requisite knowledge and skill, a lawyer should keep abreast of changes in the law and its practice, including the benefits and risks associated with relevant technology, engage in continuing study and education, and comply with all continuing legal education requirements to which the lawyer is subject.

Consider a Kansas attorney who has spent their entire career working on state tax issues. If that attorney uses an LLM to provide maritime law advice without consulting a maritime lawyer or independently verifying the output, that conduct would likely fall short of Rule 1.1's competence standard. LLMs are excellent tools when the user is already an expert, but they are not substitutes for subject-matter expertise.

> -- There are *pro se* litigants submitting filing that appear at first glance, to be polished and organized, using the right legal terms and phrases. But on closer reading, it becomes clear that the litigant has no understanding of the principles or valuation methods being invoked. The *pro se* litigant's argument is superficially persuasive but substantially hollow. Similarly, LLM-generated work can give that same illusion of competence if the attorney relying on it lacks the expertise to recognize the model's reasoning is unsound. If I, a Kansas attorney, were to advise a client on maritime law – it wouldn't be a good idea and might violate Rule 1.1.

In the future, where LLM use becomes essential to competent practice, tool selection itself may implicate Rule 1.1. For example, Attorney A uses a local Llama 3 model on a home computer with limited VRAM, while Attorney B uses a cloud-based GPT model with far greater reasoning

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[6] https://www.courts.michigan.gov/4aec3b/siteassets/committees%2C-boards-special-initiatves/michigan-judicial-council/2024-genai-wg-report.pdf (last visited Oct. 7, 2025).
[7] https://www.gasupreme.us/wp-content/uploads/2025/07/Artificial-Intelligence-and-Georgia-Courts.pdf
[8] MR 1.1; See Also ER r. 1.1, CRPC. r. 1.1; KRPC 1.1; r. NYRPC r. 1.1; TDRPC r. 1.01.
[9] MR 1.1 cmt. 8 (Am. Bar Ass'n 2012).

capacity. If both rely on their chosen models to analyze complex legal issues, questions arise: Could choosing an underpowered model fall below the competence standard?

Does LLM tool selection become part of a lawyer's duty, akin to selecting appropriate research tools or experts? Attorney B, relying upon the bigger LLM model, may have an advantage for competence under Rule 1.1, but Attorney A has an advantage in maintaining confidentiality under Rule 1.6. There could be a developing tension between these ethical rules.

7. ABA Model Rule 1.6 Confidentiality

> (a) A lawyer shall not reveal information relating to the representation of a client unless the client gives informed consent, the disclosure is impliedly authorized to carry out the representation
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> . . .
>
> (b)(6) to comply with other law or a court order.
>
> (c) A lawyer shall make reasonable efforts to prevent the inadvertent or unauthorized disclosure of, or unauthorized access to, information relating to the representation of a client.[10]
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> Most states' ethics rules mirror the Federal language, with slight changes to some text or commentary.[11]

When an attorney uses a third party LLM, the attorney provides information to a third party of the attorney's thought processes and potentially client confidential data. Let's get a little technical here: the LLM itself is stateless or nonpersistent. To be useful, the third parties (ChatGPT, Claude) create wrappers[12] that facilitate prompt and response with the LLM, and these wrappers may retain conversation history to assist in LLM understanding context – therefore being more useful. The third party LLMs may also retain these prompt and response dialogues to train subsequent models.[13]

Is that information discoverable in civil action? Is that information subject to disclosure via subpoena? The roadmap already exists for criminal and civil discovery of Google search engine results or Meta Facebook posts. Is the Prompt and Response of a LLM any different?

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[10] MR 1.6 (Am. Bar Ass'n 2023).

[11] *See* ER 1.6, KRPC 1.6, NYRPC 1.6, TDRPC 1.05.

[12] an application layer or interface that sits between the user and the underlying LLM model. Wrappers often add features such as conversation memory, context retention, logging, or analytics. In commercial LLM platforms, the wrapper—not the model itself—is typically responsible for storing session data and handling user identity, privacy settings, and data retention policies.

[13] See *In Re: OpenAI*, Inc. #1:25-md-03143 (2025), ongoing Federal District Ct. litigation that touches on what OpenAI retains from customer prompt and responses.

Does the user (the Lawyer) have a reasonable expectation of privacy when sharing his/her prompt and responses with a third party? Is such information "documents and tangible things under Fed. R. Civ. P. 26(b)(3)? My advice – until privilege and work-product boundaries are clarified, prudent practitioners should treat every cloud-hosted prompt as potentially discoverable evidence—essentially, a digital memorandum of counsel left in a public archive.[14] Companies like OpenAI are currently operating under an order to preserve and segregate all output log data.[15]

California Rules on Confidentiality

California's version of Rule 1.6 is far stricter than the ABA Model Rule because it is paired with a state specific professions rule that commands that a lawyer must "maintain inviolate the confidence, and at every peril to himself or herself, preserve the secrets of his or her client."[16]

Unlike the ABA and most other states, California allows disclosure only to prevent a criminal act likely to cause death or serious bodily harm—there are no exceptions for self-defense, compliance advice, or preventing financial harm. This near-absolute duty means that when a California lawyer uses a third-party large language model such as ChatGPT or Copilot, entering any information that reveals client identity, facts, or strategy could be treated as an unauthorized disclosure, even if the data are anonymized or the intent is purely research-related. Unless the client gives informed written consent and the lawyer verifies that the system does not store or reuse prompts, using a cloud-based LLM could violate this "at-every-peril" standard. In practical terms, California attorneys must either use firm-controlled, locally hosted AI tools or secure explicit client permission before engaging external LLM platforms.

The District of Columbia said it well

> Regarding confidential client information, lawyers should determine whether the product will save information that the lawyers provide to the GAI[LLM], and whether the lawyers' interaction with the GAI product will affect the answers the GAI gives to future users of the product outside of the lawyer's law firm. Affirmative answers to either of those questions signal a need for caution. Depending on the circumstances, lawyers should either identify a different or more advanced GAI product that can be trusted with Client Confidential Information (or negotiate with the product vendor for improved confidentiality terms to make the first product trustworthy), or input only data that is not Client Confidential Information.

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[14] See *Forman v. Henkin*, 30 N.Y.3d 656, 663 (2018) (cloud-storage subpoenas, social media discovery).

[15] *See supra* note 13.

[16] CRPC 1.6; and Cal. Bus. $ Prof. Code Sec. 6068(e)(1); See *Also OpenAI, Inc., Copyright Infringement Litig*, No. 23-CV-08292, 2025 WL 1652110 at *2 (S.D.N.Y, May 30, 2025).

If you are interested in this subject, you would be well advised to read D.C. Bar Ethics Op. 388 (2024) in its entirety.[17]

Returning to the tension between Rule 1.1 Competence, and Rule 1.6 Confidentiality

A localized LLM runs on a private computer or secure firm server, rather than being accessed over the internet through a third-party provider. Because it operates entirely within the lawyer's or firm's own digital environment, no client data ever leaves the lawyer's control, making it far easier to comply with strict confidentiality rules such as California's "at every peril" standard and avoid subpoena/discovery demands.[18]

The tradeoff is that a local model typically has fewer parameters and less processing power than massive commercial models hosted in the cloud, so the localized LLM's reasoning and writing may be less sophisticated or slower. The trajectory of legal technology points towards localized LLMs as the future of law practice—tools that allow firms to harness the efficiency and drafting power of AI while maintaining complete control over sensitive client information - meeting ethical duties of confidentiality and competence. Furthermore, as localized application tools become more capable, the lawyer will be able to focus the LLM's operation on his/her specialized area of law through alignment techniques, fine-tuned on curated pleadings, retrieval augmented generation, and prompt orchestration tools like LLM temperature adjustment.

8. ABA Model Rule 5.3 Responsibilities Re: Nonlawyer Assistance

With respect to a nonlawyer employed or retained by or associated with a lawyer, ABA Model Rule 5.3 states:

> (a) a partner, and a lawyer who individually or together with other lawyers possesses comparable managerial authority in a law firm, shall make reasonable efforts to ensure that the firm has in effect measures giving reasonable assurance that the person's conduct is compatible with the professional obligations of the lawyer.
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> (b) a lawyer having direct supervisory authority over the nonlawyer shall make reasonable efforts to ensure that the person's conduct is compatible with the professional obligations of the lawyer; and
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> (c) a lawyer shall be responsible for conduct of such a person that would be a violation of the Rules of Professional Conduct if engaged in by a lawyer if the

[17] DC Bar Ethics Opinion 388 (Apr. 11, 2024) (https://www.dcbar.org/for-lawyers/legal-ethics/ethics-opinions-210-present/ethics-opinion-388?utm_source=chatgpt.com (last visited Oct. 7, 2025).

[18] See https://www.forbes.com/sites/jasonsnyder/2025/07/27/openai-chatgpt-wants-legal-rights-you-need-the-right-to-be-forgotten/ (last visited Oct. 7, 2025).

> lawyer orders or, with knowledge, ratifies the conduct, or fails to take remedial action when aware of the misconduct.[19]

When a lawyer brings a LLM into their practice, the model effectively becomes a nonlawyer assistant within the meaning of Rule 5.3. That obligates the lawyer to make "reasonable efforts" to ensure the model's operation is consistent with the lawyer's ethical duties, particularly competence (Rule 1.1), confidentiality (Rule 1.6), and candor (Rule 3.3). You are well advised to have basic understanding how the system works, what data it retains, and how it handles client information. Lawyers must exercise the same oversight they would for a paralegal or contract researcher: review outputs for accuracy, verify citations, and correct errors before filing or communicating them. Delegating legal analysis to an unsupervised LLM without review would be the functional equivalent of permitting a nonlawyer to sign pleadings or give legal advice, which Rule 5.3 squarely prohibits.

The rule puts some responsibility on the law firm (or government law bureau[20]) itself, Rule 5.3(a) imposes a firm-level obligation to adopt policies and safeguards ensuring AI use remains "compatible with the professional obligations of the lawyer." That might mean using only approved software, turning off prompt retention, or keeping a simple log of what was generated —as well as training for lawyers and staff.[21] In essence, Rule 5.3 treats the LLM as part of the firm's human-plus-machine support structure, and it requires that structure to be ethically supervised. As AI tools become more integral to daily practice, compliance with Rule 5.3 may determine whether a lawyer's use of an LLM is viewed as innovative professionalism or as negligent outsourcing of legal judgment.

9. ABA Model Rule 3.3 – Candor Toward the Tribunal

> (a) A lawyer shall not knowingly:
> (1) make a false statement of fact or law to a tribunal or fail to correct a false statement of material fact or law previously made to the tribunal by the lawyer;
> (2) fail to disclose to the tribunal legal authority in the controlling jurisdiction known to the lawyer to be directly adverse to the position of the client and not disclosed by opposing counsel; or
> (3) offer evidence that the lawyer knows to be false.[22]

Rule 3.3 is about keeping the court's trust. It's the rule that says, in plain English, "Don't mislead the judge." Lawyers are expected to check their work before filing, and that duty doesn't stop

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[19] See ER 5.3 (Ariz.); KRPC 5.3 (Kan.); CRPC 5.3 (Cal.); NYRPC 5.3 (N.Y.); TDRPC 5.03 (Tex.); DLRPC 5.3 (Del.), each imposing duties on lawyers to supervise nonlawyers and third-party service providers. By analogy, these rules extend to oversight of AI and large-language-model tools used in legal practice.

[20] See Kansas Generative Artificial Intelligence Policy, https://www.governor.ks.gov/home/showpublisheddocument/405/638744386434630000 (last visited Oct. 7, 2025).

[21] This is much easier done in a localized environment. (e.g. LM Studio and Ollama).

[22] Model Rules of Prof'l Conduct r. 3.3 (Am. Bar Ass'n 2023).

just because a computer helped draft it. If you use an LLM to write a motion or brief, you're still the one certifying the accuracy of what's filed. We've already seen several examples—hallucinated citations in Mata v. Avianca in New York[23] (this is an actual AI-sanction case) where lawyers were sanctioned because the AI "hallucinated" citations that didn't exist. Rule 3.3 doesn't care whether the mistake came from ChatGPT, an associate, or a clerical error; if it reaches the court under your name, you're responsible for correcting it.[24]

The safe practice is to treat every AI-generated case citation as suspect until verified. That means reading the cases, checking the docket, and confirming that the authority says what the AI claims it says. Good old-fashioned lawyering. If an LLM gives you a new or unusual citation, that's a red flag[25], not a shortcut. Lawyers should also be careful about letting AI summarize precedent because it can sometimes blend holdings from multiple cases into something that sounds right but isn't. Using an LLM can save time, but you still need a human in the loop to make sure what you're filing is true, relevant, and properly supported. Failing to do that doesn't just risk embarrassment; it can violate Rule 3.3 and trigger Rule 11 sanctions.

10. Other ABA Rules Implicated by LLM Usage

Rule 1.5 — Fees

If a lawyer uses LLMs or GAI to reduce the time required for research, drafting, or review, yet continues to bill full hourly rates without disclosure, that may render the fee "unreasonable" under Rule 1.5. Also, passing along subscription or API costs for AI services must be justified and allocated transparently so as not to mask hidden or excessive charges.

Rule 5.1 — Responsibilities of Partners, Managers, and Supervisory Lawyers

Firm leadership and supervising lawyers must adopt policies, training, and oversight mechanisms ensuring that use of LLMs by associates or staff complies with all ethical duties (e.g. validation of outputs, confidentiality, avoiding misrepresentation). Failure to supervise or institute safeguards may itself be a breach of the duty to ensure that all lawyers in the firm "conform to the Rules."

Rule 5.5 — Unauthorized Practice of Law; Multijurisdictional Practice

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[23] *Mata v. Avianca*, No. 22-cv-1461 (S.D.N.Y. 2023) and *Park v. Kim*, 91 4th 610, 117 Fed.R.Serv.3rd 1693 (2024).

[24] ABA Rule 8.4 Misconduct may also be implicated here. If a lawyer recklessly passes off GAI-generated hallucinations, fake case citations, or misstatements as genuine, that may amount to deceit, misrepresentation, or other misconduct, egregious misuse of AI could be disciplined as professional misconduct even when no other rule fully captures the behavior.

[25] Cf. *Kansas v. Missouri*, 8 U.S. 21 (1863) (a day that lives in infamy for us Jayhawkers – included herein to test whether a human is reading this, and not a LLM summarization agent).

Allowing an AI tool to generate legal advice or draft legal work for clients without meaningful attorney review risks turning the AI into a de facto nonlawyer "practitioner," potentially violating unauthorized-practice prohibitions. Moreover, providing AI-assisted advice across jurisdictional lines (e.g. local law advice via a tool hosted elsewhere) raises questions about practicing law in jurisdictions where the lawyer is not licensed.

Rule 4.1 — Truthfulness in Statements to Others

When an attorney uses an LLM to draft communications (e.g. demand letters, settlement proposals), the lawyer is responsible for ensuring that none of the AI's statements of fact or law are misleading or false; hallucinated claims must be caught and corrected. Relying on an AI's confidently phrased but inaccurate assertion without independent verification risks violation of the truthfulness duty.

11. Conclusion

LLMs represent a transformative development in legal practice. The more comfortable lawyers become with incorporating LLMs--whether local or cloud based--the more their usage will grow. This adoption is unavoidable with many local court rules being created to require practitioners to acknowledge the risks in every pleading filed.[26]

Their use engages long-standing ethical duties under the ABA Model Rules and state ethic rule, by introducing novel risks such as hallucinations, bias, and confidentiality breaches. Lawyers should approach LLM use with the same diligence they apply to any specialized tool, understanding its capabilities, verifying its outputs, and integrating it responsibly into their professional judgment.

[26] Johnson County (Kansas) District Court Local Rule 3.7 – "the undersigned hereby certifies that Generative A.I. was used to draft/prepare [Title of Document]. Specifically, [Name of A.I. tool] was used, in whole or in part, to draft/prepare this submission. The undersigned further certifies that he/she has independently verified the accuracy of every citation to the law or to the record and that any language drafted by Generative A.I., including quotations, citations, paraphrased assertions, and/or legal analysis has been included and submitted after considering the requirements of KSA 60-211 and any applicable ethical rules governing attorneys."