

The Human Holds the Pen

What Creating a Gen AI Tool Taught Us About AI Usage



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What To Expect

1. The Problem with Class Notices
2. Solving the Problem
3. Building an AI Tool
4. NoticeAssist in Action
5. Applying AI Guardrails
6. Questions

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John Henry Frankel
Communications
Lead, Legal
Technology



Jocelyn Larkin
Of Counsel
former Executive
Director

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Grants

Litigation

Training



Pictured: Children's Hospital Los Angeles (CHLA).

Last month, we settled a lawsuit to block the Department of Justice from accessing the private medical records of more than 3,000 trans youth receiving gender-affirming care at CHLA.

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Class action specialists

Notices for class action lawsuits are terrible in at least two ways:

- *Visually intimidating*
- Text hard to understand

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

WASHTENAW COUNTY EMPLOYEES'
RETIREMENT SYSTEM, Individually and on
Behalf of All Others Similarly Situated,
Plaintiff,
v.
WALGREEN CO., et al.,
Defendants.

Civil Action No. 1:15-cv-3187-SJC-GAF

Honorable Sharon Johnson Coleman

NOTICE OF PENDENCY OF CLASS ACTION

TO: ALL PERSONS AND ENTITIES WHO PURCHASED OR OTHERWISE ACQUIRED WALGREEN CO. COMMON STOCK BETWEEN MARCH 25, 2014 AND AUGUST 5, 2014, INCLUSIVE, AND WERE DAMAGED THEREBY (THE "CLASS")

A federal court has authorized this notice. This is not a solicitation from a lawyer.

PLEASE READ THIS NOTICE CAREFULLY AND IN ITS ENTIRETY. YOU MAY BE A MEMBER OF THE CLASS DESCRIBED HEREIN. AS SUCH, YOUR RIGHTS MAY BE AFFECTED BY A PENDING CLASS ACTION LAWSUIT. THIS NOTICE ADVISES YOU OF YOUR OPTIONS REGARDING THE CLASS ACTION.

PLEASE DO NOT CALL OR WRITE THE COURT. IF YOU HAVE ANY QUESTIONS AFTER READING THIS NOTICE, YOU SHOULD CONTACT CLASS COUNSEL OR THE ADMINISTRATOR, AS DISCUSSED FURTHER BELOW.


This Notice is being sent pursuant to Rule 23 of the Federal Rules of Civil Procedure and an Order of the United States District Court for the Northern District of Illinois ("Court") to inform you: (a) of a class action lawsuit that is now pending in the Court under the above caption ("Action") against Walgreen Co. ("Walgreens"), former Walgreens Chief Executive Officer Gregory D. Wasson, and former Walgreens Chief Financial Officer Wade D. Miquelon (collectively, "Defendants"); and (b) that the Action has been certified by the Court to proceed as a class action on behalf of the Class, as defined in ¶ 1 below. **This Notice is not a settlement notice and you are not being asked to submit a claim.**

1. By Memorandum Opinion and Order dated March 29, 2018, the Court certified the following Class:

All persons and entities who purchased or otherwise acquired Walgreen Co. common stock between March 25, 2014 and August 5, 2014, inclusive (the "Class Period"), and were damaged thereby.

Excluded from the Class by definition are: (i) any Defendant in this Action; (ii) the officers and directors of Walgreens; (iii) members of the immediate families of the

Questions? Call toll-free 1-866-963-9976 or visit www.WalgreensSecuritiesLitigation.com



United States District Court for the Northern District of California
 In re JUUL Labs, Inc. Marketing, Sales Practices, and Products Liability Litigation
 Case No. 19-md-02913-WHO

Class Action Notice

Authorized by the U.S. District Court

Did you buy a JUUL product before December 7, 2022?

A class action Lawsuit and a Settlement of part of that Lawsuit could affect your rights.

You may be eligible to receive a payment from a \$255 Million Settlement of Part of the Lawsuit

Your options:

- 1. Make a claim.** Get a payment.
- 2. Do nothing.** You will get no payment and be bound by the Settlement and the Lawsuit.
- 3. Opt out of the Settlement or the Lawsuit.**
- 4. Object to the Settlement.**

You are not being sued.

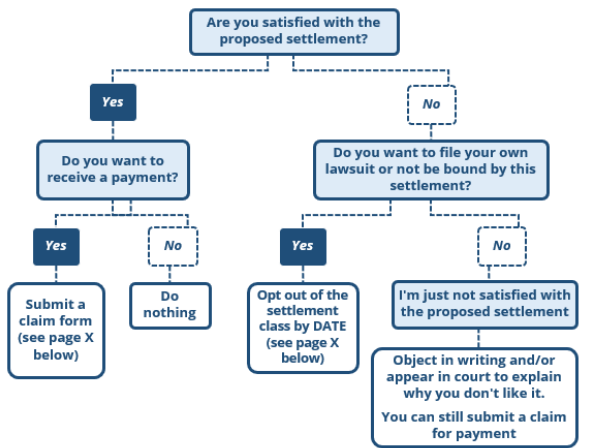
This notice explains the Lawsuit, the Settlement, and your legal rights and options.

Please read entire notice carefully.

You need to make decisions about two different parts of the case, the settlement and the continuing court case.

To make the best decisions for you, read on.

THE \$255 MILLION SETTLEMENT WITH JUUL LABS



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    graph TD
      Q1[Are you satisfied with the proposed settlement?] -- Yes --> Q2[Do you want to receive a payment?]
      Q1 -- No --> Q3[Do you want to file your own lawsuit or not be bound by this settlement?]
      Q2 -- Yes --> A1[Submit a claim form (see page X below)]
      Q2 -- No --> A2[Do nothing]
      Q3 -- Yes --> A3[Opt out of the settlement class by DATE (see page X below)]
      Q3 -- No --> A4[I'm just not satisfied with the proposed settlement]
      A4 --> A5[Object in writing and/or appear in court to explain why you don't like it. You can still submit a claim for payment]
    
```

What are the benefits of the Settlement?

JUUL Labs, on behalf of itself and other persons and entities, has agreed to pay \$255,000,000 to settle the claims of the Settlement Class. Class members who submit a claim will be eligible to get paid from that Settlement amount after payment for the lawyers' fees and the case expenses described below.

Your Options as a Settlement Class Member

What are my Options if I am a Settlement Class Member?

You have three options as a member of the Settlement Class. You can (1) file a claim to get paid from the Settlement, (2) do nothing and remain in the Settlement Class but get no payment, or (3) opt out of the Settlement Class and receive no payments from the Settlement but retain your right to sue JUUL Labs and the persons and companies on whose behalf it settled. You can also object to any part of the Settlement that you do not like, as long as you don't opt out of the Settlement Class.

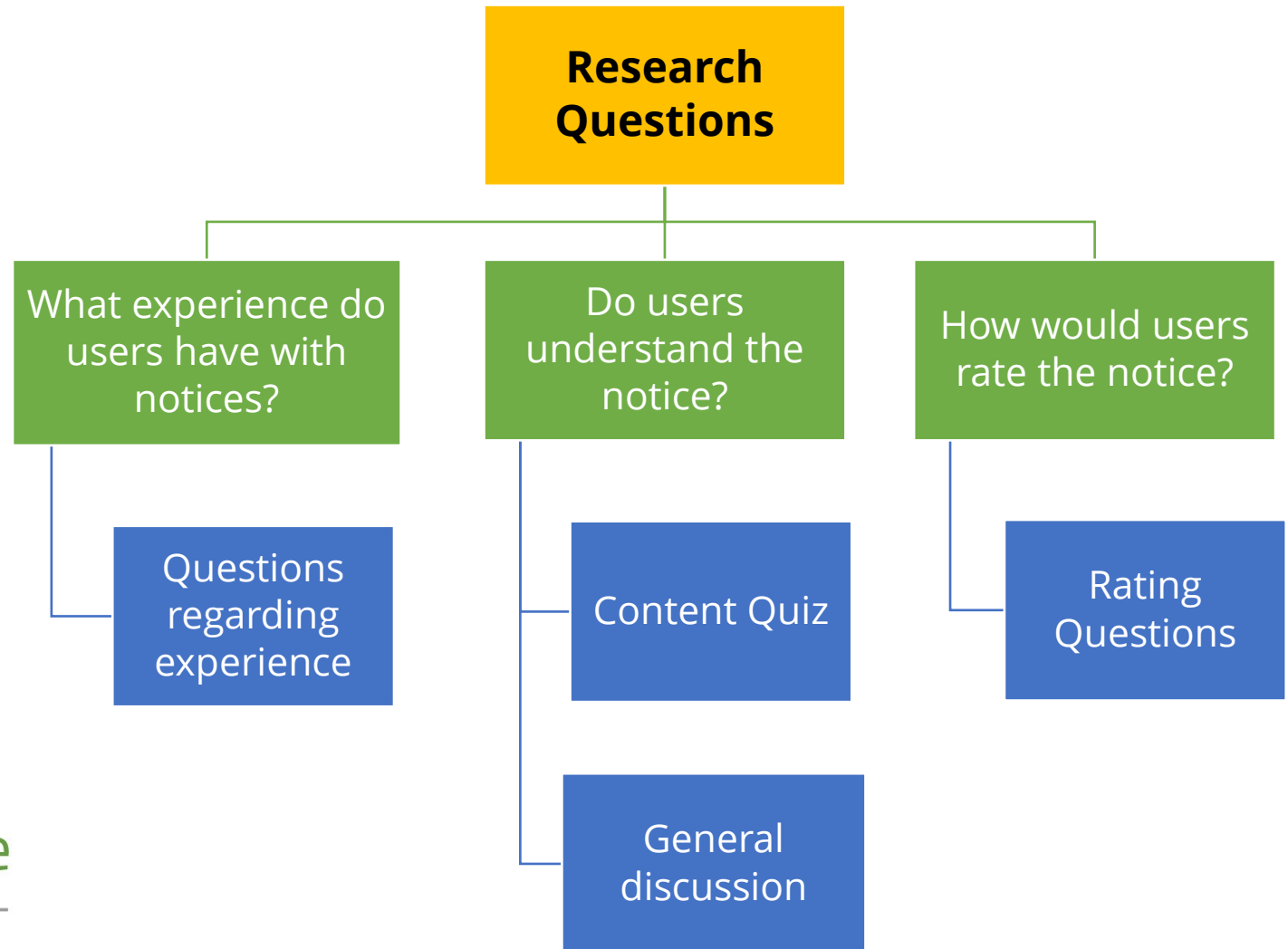
	Submit a Claim	Do Nothing	Opt Out of the Settlement Class
Will I receive money from the Settlement if I...	Yes	No	No
Am I bound by the Settlement if I...	Yes	Yes	No
Can I pursue my own case for the specific claims in the Settlement against JUUL and the persons and entities it settled on behalf of if I...	No	No	Yes

Do I need to do anything to get paid?

YES. To get paid from the Settlement, you **MUST** submit a claim.

The deadline to make a claim for a settlement payment is MONTH XX, 2023.

How do I submit a claim?





NOTICE PROJECT

List of All Notice Project Templates as of September 4, 2025

Full-Color Templates

Opt-Out Form | Envelope
 One Page Class Certification | Settlement
 Postcard Class Certification | Settlement
 Product Liability Class Certification | Settlement
 Employment Discrimination Class Certification | Settlement
 Securities Class Certification | Settlement
 California Wage and Hour Class Certification | Settlement
 Privacy Class Certification | Settlement
 FLSA Conditional Certification

Black and White Templates

Opt-Out Form
 One Page Class Certification | Settlement
 Postcard Class Certification | Settlement
 Product Liability Class Certification | Settlement
 Employment Discrimination Class Certification | Settlement
 Securities Class Certification | Settlement
 California Wage and Hour Class Certification | Settlement
 Privacy Class Certification | Settlement

Spanish Language Templates and Translation Certifications

California Wage and Hour Class Certification | Settlement
 Product Liability Class Certification | Settlement
 One Page Class Certification | Settlement
 FLSA Conditional Certification

Email Templates

General Email Template Class Certification | Settlement

Learn more at NoticeProject.org.



Tribunal de Distrito de los Estados Unidos
 [Name of Case]
 Número de la causa

Aviso de demanda de acción de clase

Autorizado por el Tribunal de Distrito de los Estados Unidos



Example QR Code. Replace this with case specific QR Code.



¿Por qué recibió usted este aviso?

Este aviso es para informarle del acuerdo de una demanda de acción de clase, [lawsuit name], interpuesta en nombre de las personas que [bought products made] por [defendant]. Usted recibió este aviso porque **podría ser un miembro del grupo de personas afectadas**, llamadas la "clase", y porque **podría tener derecho a recibir parte de este dinero como parte del acuerdo**. En este aviso se le indica cómo obtener más información sobre el acuerdo.

¿Realizó usted [action that would make you a class member] en algún momento desde [Month, Year]?

Sus opciones	Más información sobre cada opción:
Presentar un formulario de reclamación	Presentar un formulario de reclamación para obtener un pago proveniente del acuerdo.
Optar por no participar	Presentar un formulario para optar por no participar. No recibir ningún pago y mantener el derecho a demandar a [defendant] por los mismos asuntos.
No hacer nada	Usted no recibirá ningún pago. Renunciar al derecho a demandar a [defendant] por los mismos asuntos.
Presentar una objeción	Dígale al tribunal por qué no le gusta el acuerdo.

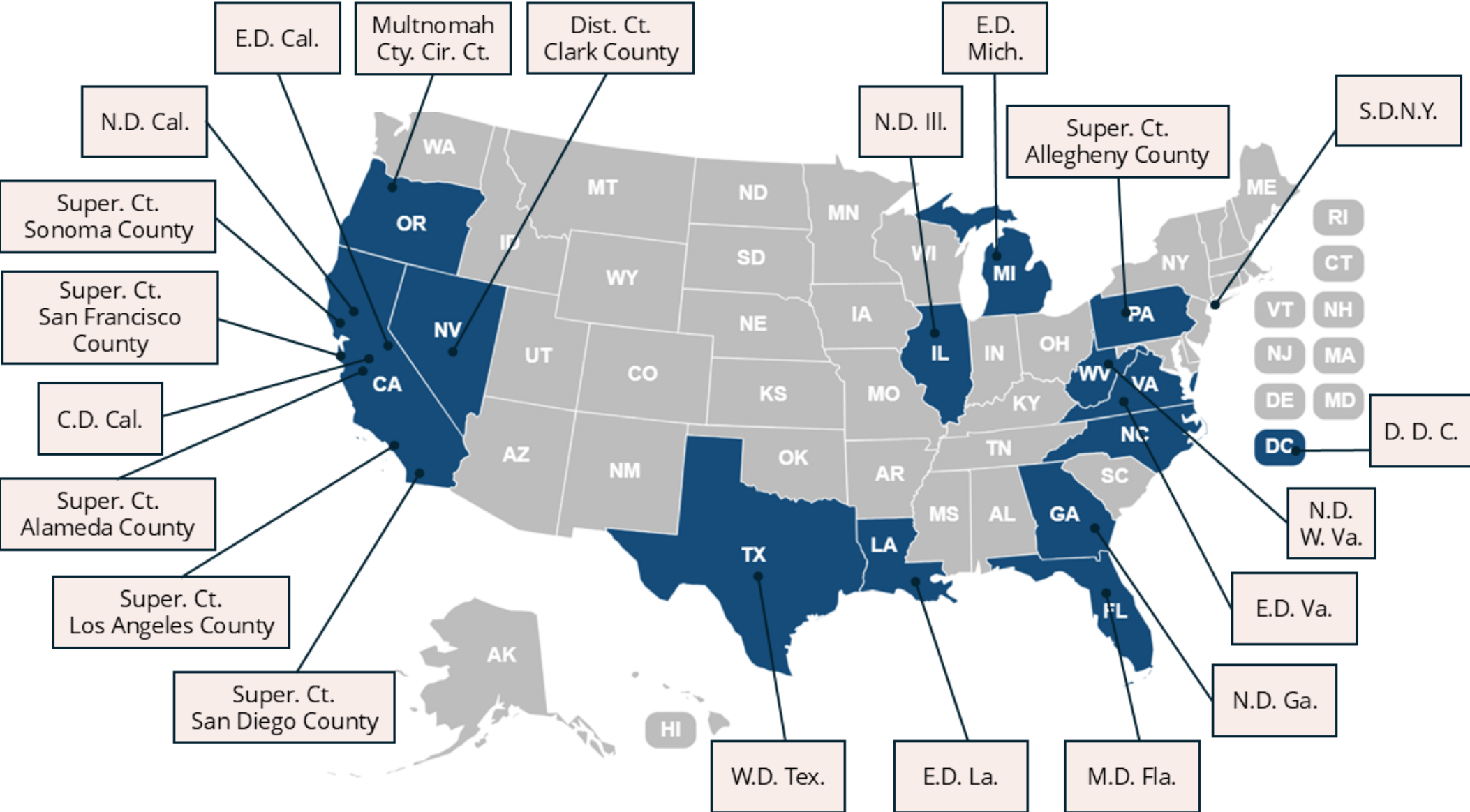
Si usted quiere presentar una reclamación, deberá hacerlo para el [Month, Day, Year]

Usted puede presentar una reclamación y obtener más información en [\[website\]](#) o escaneando el código QR.

Cosas clave a saber:

- Este es un documento legal importante.
- Si usted no toma ninguna medida, seguirá estando obligado por el acuerdo y sus derechos se verán afectados.
- Si usted tiene preguntas o necesita ayuda, por favor, llame al [phone number].

Templates in 2026: 40+ cases, 21 Judicial Districts



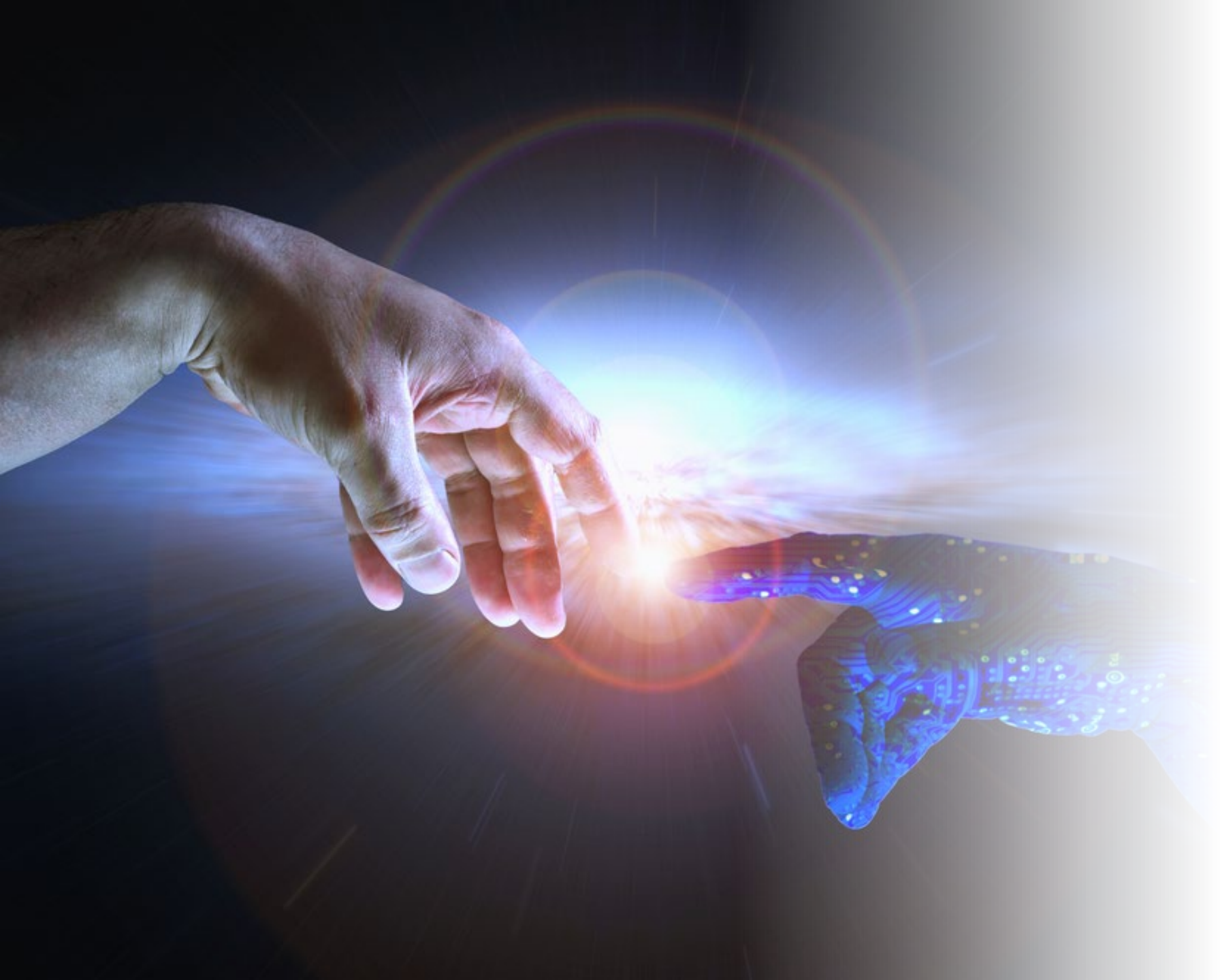
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**Can
technology
help?**



**Can AI
technology
help?**

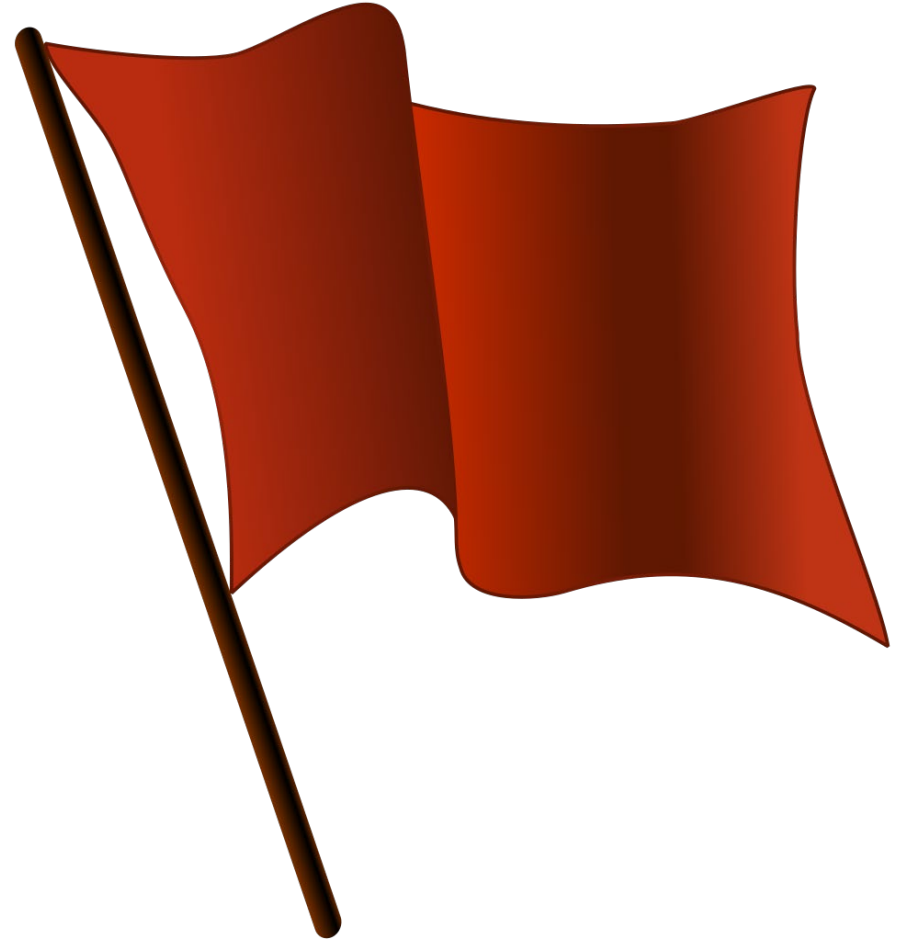
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NOTICE PROJECT

AI technology red flags

- Hallucinations
- Data privacy
- Confidently incorrect
- Reproduces bias
- Lack of nuance







Notice Assist





Notice Assist



Analyzes notices



**Provides suggestions
for improvements**



... and that's it!

Prompt: “Rewrite this paragraph to make it understandable at an 8th grade level.”

NoticeAssist video demo here – removed to reduce file size.

NA Notice Assist

Critical Boundaries:

1. Doesn't write notices.
2. Needs consent to make changes.
3. Protects user data.



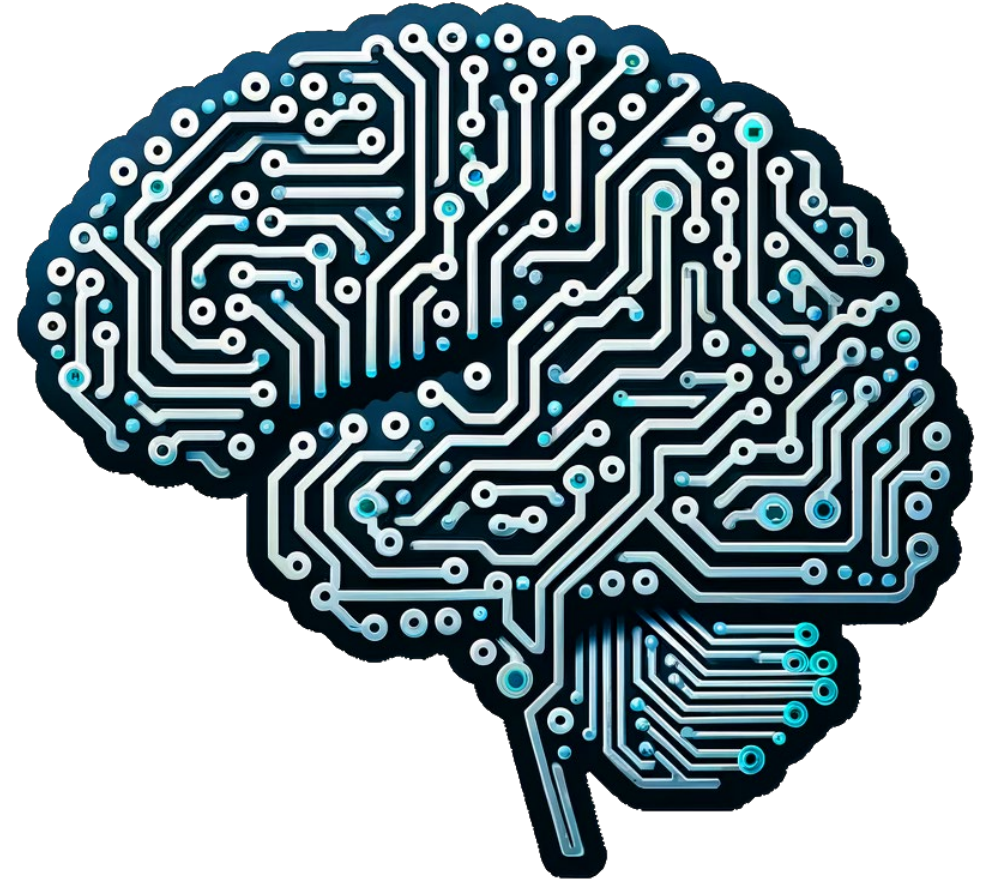
A cattle grid providing a secure boundary.

Photo by David Bena.

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AI Use in the Impact Fund Office

1. AI doesn't think.
2. AI can't be held responsible.
3. AI outputs always require review.



*An image made by the gen AI tool Dall-e 3.
The prompt was: "draw an icon, white
background, of a human brain made out of
printed circuit board"*

3. Guiding Principles

The Impact Fund adopts the following foundational principles to guide its use of generative AI tools for organizational purposes:

- a. Use of generative AI tools at the Impact Fund will be human centered. Our work is rooted in authentic human ingenuity and connection, therefore our colleagues and constituents must understand that all Impact Fund communications and work product come from a person. Misuse of generative AI tools can damage our internal trust in each other and external trust in our work and professional reputation.
- b. Generative AI tools are not a substitute for human judgment and creativity.
- c. Employees hold ultimate responsibility for producing reliable work product via replicable means, even when using generative AI tools.

- e. Review and verify all generative AI outputs before use, including by identifying and reviewing primary sources and by fact-checking AI outputs against independent research.
- f. Review generative AI outputs for algorithmic (inherited) discrimination, including the perpetuation or recreation of bias.

You can download our AI policy from the footer of our website: ImpactFund.org

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Road to our AI Policy





Takeaways:

Bad communication
fails our clients.

AI can help improve
communication.

“Rewrite this
paragraph to make
it understandable at
an 8th grade level.”



Takeaways:

Consider where
AI can be used
safely.

Consider where
AI can provide
you with
assistance.

Retain editorial
control of AI.

Get the **NoticeAssist** software and the **Notice Templates** for free at:

[NoticeProject.org](https://www.noticeproject.org)

You must sign in to
receive MCLE credit for
The Human Holds the Pen:

<https://forms.office.com/g/GArdAhDi95>

MCLE Program Sign-In for
February Session of Tech & AI in
Legal Aid

