

CAN GARFIELD AI BE REPLICATED IN NIGERIA? EXPLORING THE POSSIBILITY OF A FULLY AI POWERED LAW FIRM

Foluso Olusanya



INTRODUCTION

Garfield AI, is the first 100% AI-powered law firm to receive approval from the UK's Solicitors Regulation Authority (SRA) to provide regulated legal services.¹ Founded by Philip Young, a litigation lawyer, and Daniel Long, a quantum physicist, Garfield AI was created to address a widespread but underserved legal problem in the UK: the difficulty small businesses face in recovering low-value debts. Garfield AI aims to democratize access to justice by providing a low-cost, automated platform that helps individuals and small businesses navigate the English and Welsh small claims court system for debts under £10,000.²



How Does Garfield AI Operate?

Garfield helps users pursue a debt claim in the small claims track of the English County Court. As part of this, Garfield guides users through all the steps necessary to take a case to trial and helps compose and send the relevant documents as well as respond to any documents users receive from the Court or the debtor.³

Users upload their unpaid invoices/debt owed to Garfield and the AI:

- Checks for limitation issues;
- Verifies the debtor's solvency via the UK's Companies House;
- Generates pre-action communication for £2 (this could be a “polite chaser” to the debtor or a pre action letter).⁴

¹Solicitors Regulation Authority, 'SRA Approves First AI-Driven Law Firm' (6 May 2025) <https://www.sra.org.uk/sra/news/press/garfield-ai-authorised/> accessed 11th June 2025

²Michael Cross, 'In Depth: "World's First AI Law Firm" Targets High Street Practices' The Law Society Gazette (9 May 2025) <https://www.lawgazette.co.uk/news-focus/in-depth-worlds-first-ai-law-firm-targets-high-street-practices/5123234.article> accessed 11 June 2025.

³Garfield.Law Ltd, 'Garfield AI: Recover Debts Easily, Quickly and Affordably' (2025) <https://www.garfield.law/#about> accessed 11th June 2025

⁴Laubscher Attorneys Incorporated, 'Garfield.law and the Rise of AI-Only Legal Services: Could This Be the Future of Small Claims in South Africa?' (LinkedIn, 7 May 2025) <https://www.linkedin.com/pulse/garfieldlaw-rise-ai-only-legal-services-pd5cf/> accessed 11th June 2025

Garfield subsequently prepares the Claim form and Particulars of Claim (originating processes). When approved, it will submit them to the Court and calculate interest under either the relevant statute or the contract.⁵

Additionally, based on the user's location, Garfield appears to advise on the "best" court to institute the action.⁶ In the event a debtor responds that he/she intends to settle the matter out of court, Garfield advises on whether or not the user should close the case. In the event the debtor files a defence, Garfield can prepare statements of case, skeleton arguments, the court trial bundle, settlement offers and other documents.⁷

Notably, users must approve all actions, which keeps the process client-controlled, and ensures the system is not fully autonomous.⁸ Users can also review, modify and approve drafts before anything is filed.⁹

Why is Garfield possible in the United Kingdom?

Garfield was presented to the senior judiciary at the Civil Justice National Forum and the SRA and it took eight months before it was approved.¹⁰ The SRA assessed:

- Data security and client confidentiality
- Safeguards against AI hallucinations (erroneous or fictional legal content)
- Oversight structures for accuracy
- The role of lawyers in design, monitoring, and risk management¹¹

Additionally, in accordance with the UK Legal Service Act (LSA), regulatory requirements stipulate that a law firm must have a designated regulated solicitor who is ultimately responsible for ensuring the firm maintains high professional standards.¹² At least one person within the team must be a solicitor.¹³ Under SRA rules, these solicitors are responsible for all system outputs and for anything that goes wrong. In the case of Garfield, the responsibility for this role within the company lies with Philip Young, the company's co-founder¹⁴ who confirmed that he is personally reviewing every output.¹⁵

5Artificial Lawyer, 'Is Garfield the '1st AI-Driven Law Firm' A Big Deal? (12 May 2025) <https://www.artificiallawyer.com/2025/05/12/is-garfield-the-1st-ai-driven-law-firm-a-big-deal/> accessed 11th June 2025

6Garfield.Law Ltd, 'Garfield AI: Recover Debts Easily, Quickly and Affordably' (2025) <https://www.garfield.law/#pricing> accessed 11th June 2025.

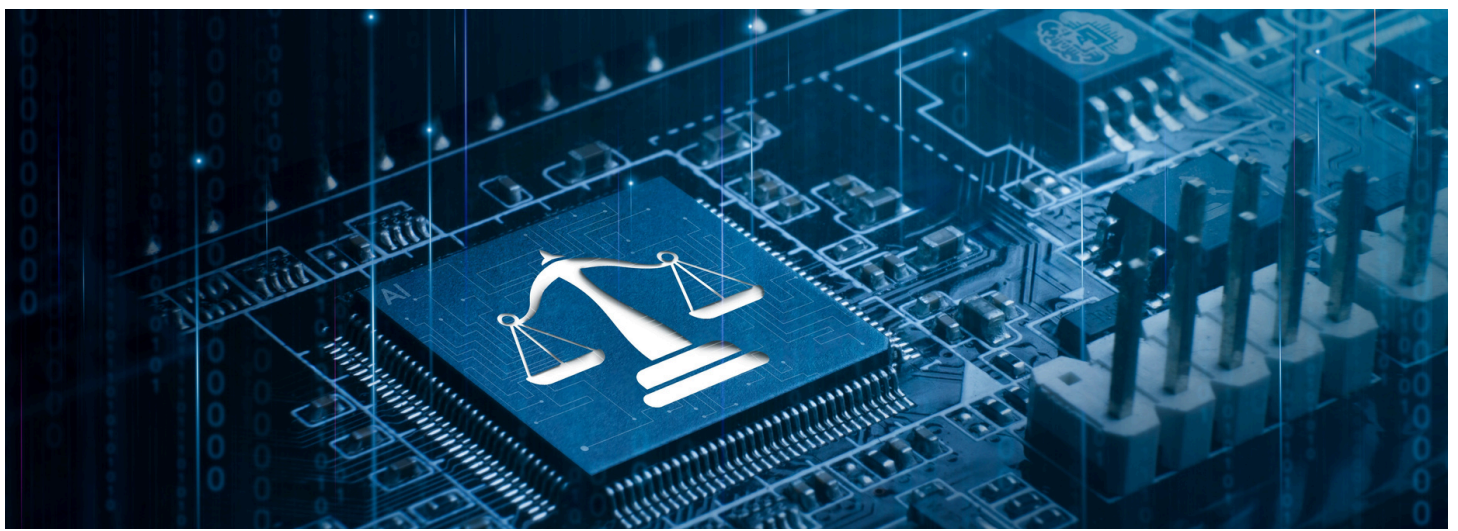
7Garfield.Law Ltd 'For Debtors' (2025) <https://www.garfield.law/debtors> accessed 11th June 2025

8Laubscher Attorneys Incorporated, 'Garfield.law and the Rise of AI-Only Legal Services: Could This Be the Future of Small Claims in South Africa?' (LinkedIn, 7 May 2025) <https://www.linkedin.com/pulse/garfieldlaw-rise-ai-only-legal-services-pd5cf/> accessed 11th June 2025

9Minke Reijneveld and Jan-Jaap Koningsveld, 'First AI Law Firm in The Netherlands?' Stibbe (16 May 2025) <https://www.stibbe.com/publications-and-insights/first-ai-law-firm-in-the-netherlands> accessed 11th June 2025

10Michael Cross, 'In Depth: "World's First AI Law Firm" Targets High Street Practices' The Law Society Gazette (9 May 2025) <https://www.lawgazette.co.uk/news-focus/in-depth-worlds-first-ai-law-firm-targets-high-street-practices/5123234.article> accessed 11th June 2025

11Laubscher Attorneys Incorporated, 'Garfield.law and the Rise of AI-Only Legal Services: Could This Be the Future of Small Claims in South Africa?' (LinkedIn, 7 May 2025) <https://www.linkedin.com/pulse/garfieldlaw-rise-ai-only-legal-services-pd5cf/> accessed 11th June 2025



Can Nigeria Replicate Garfield AI?

From a technological standpoint, Nigeria already possesses the foundational tools needed to support AI-driven legal services. Platforms like **Case Radar** are already enabling the public to access personalised legal advice, predict case outcomes, draft legal documents, connect with lawyers, and conduct in-depth research into Nigerian laws. These developments reflect a growing appetite for legaltech solutions and signal the country's readiness to embrace more advanced, AI-powered innovations in the legal sector.

A system similar to Garfield - combining natural language processing, document automation, and case tracking for debt recovery for the Nigerian Small Claims Court can certainly be built by Nigerian developers and legal professionals.

The Small Claims Court in Nigeria.

The Small Claims Court in Nigeria are specialized courts designed to provide quick, cost-effective resolution of simple civil disputes involving modest financial claims.¹⁶ Their primary purpose is to ease the burden on regular courts and improve access to justice for individuals and small businesses. These courts are intended to be user-friendly, allowing litigants to represent themselves without requiring legal practitioners,¹⁷ thereby reducing procedural delays and litigation costs.

The monetary jurisdiction of Small Claims Court in Nigeria is defined by laws enacted at the state level. For example, the monetary threshold in Lagos and Edo State is ₦5,000,000.00 (five million Naira),¹⁸ and ₦1,000,000.00 (one million Naira) in Ogun and Zamfara State.¹⁹

12Minke Reijneveld and Jan-Jaap Koningsveld, 'First AI Law Firm in The Netherlands?' Stibbe (16 May 2025) <https://www.stibbe.com/publications-and-insights/first-ai-law-firm-in-the-netherlands> accessed 11th June 2025

13 Ibid

14Michael Cross, 'In Depth: "World's First AI Law Firm" Targets High Street Practices' The Law Society Gazette (9 May 2025) <https://www.lawgazette.co.uk/news-focus/in-depth-worlds-first-ai-law-firm-targets-high-street-practices/5123234.article> accessed 11th June 2025

15 Ibid

16 Article 1 of the small claims court practice direction Lagos state.

Possible Legal and Regulatory Constraints?

Laws such as the Legal Practitioners Act (LPA) and the Rules of Professional Conduct²⁰ (RPC) play a significant role in regulating legal practice in Nigeria. **Section 2** of the LPA provides that “*Subject to the provisions of this Act, a person shall be entitled to practice as a barrister and solicitor if, and only if, his name is on the roll.*”

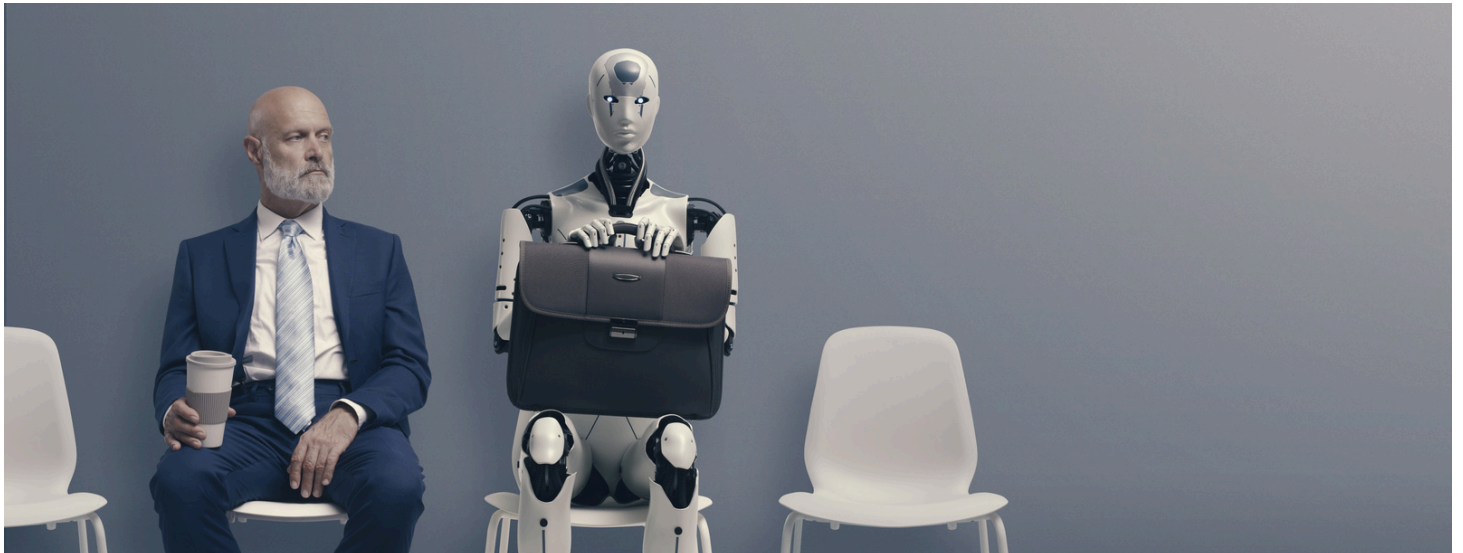
Section 22 of the LPA further provides the list of offences for persons other than a legal practitioner who practice or hold themselves out as practicing law in Nigeria.

However, it can be argued that Garfield AI does not practice law. In the United Kingdom, the model is specifically structured such that a qualified solicitor supervises the system and assumes full professional responsibility for all outputs.

If a similar model is deployed in Nigeria, where a Nigerian-licensed lawyer oversees, reviews, and authorises every AI-generated document, the AI itself will not constitute a person or entity “practicing law.” Rather, it becomes a legal tool or assistant, functioning like research software or a document automation platform, made possible through a duly enrolled practitioner. In this framework, the practitioner remains the face and authority of legal services, and therefore complies with Section 2.

Irrespective of the above, the RPC still presents a significant challenge for the replication of Garfield AI. In particular, Rules 3 and 4 of the RPC present notable hurdles that go to the heart of lawyer independence, professional responsibility, and the structure of legal service delivery.

Rule 3 of the RPC provides that: “*A lawyer shall not (a) aid a non-lawyer in the unauthorized practice of the law; (b) permit his professional services or his name to be used in aid of, or to make possible, the unauthorized practice of law by any person not Qualified to practice or disqualified from practice*”



¹⁷Article 10 of the small claims court practice direction Lagos state.

¹⁸Please see Article 2(d) of the small claims court practice direction Lagos state, Article 2(d) Practice Directions on Small Claims 2020 (Edo), <https://edojudiciary.gov.ng/wp-content/uploads/2022/02/SIGNED-Small-Claims-Court-Practice-Directions.pdf> accessed 16th June 2025

¹⁹Ogun State Judiciary, Small Claims Court, [https://ogunstatejudiciary.gov.ng/small-claims-court-](https://ogunstatejudiciary.gov.ng/small-claims-court-2/#:~:text=The%20Ogun%20State%20Small%20Claims,1st%20of%20June%2C%202020)

[2/#:~:text=The%20Ogun%20State%20Small%20Claims,1st%20of%20June%2C%202020](https://ogunstatejudiciary.gov.ng/small-claims-court-2/#:~:text=The%20Ogun%20State%20Small%20Claims,1st%20of%20June%2C%202020) accessed 16th June 2025, Article 2(1)(d) of the Practice Directions on Small Claims Court 2023, Zamfara State.

²⁰as amended 2023

This rule raises immediate concerns, being that:

- i. An AI system, though not a person, performs substantive legal functions such as drafting pleadings, interpreting legal claims, and generating court documents;
- ii. A lawyer lends their name or license to endorse or supervise an AI platform, even if that platform is the primary interface for the client.

Even if a Nigerian lawyer is placed in supervisory control, the extent to which that lawyer's name is used to "enable" or "make possible" the AI's delivery of legal services may be interpreted as a violation of Rule 3(b).

Rule 4 of the RPC also provides that *"A lawyer shall not permit his professional service to be controlled or exploited by any lay agency, personal or corporate, which intervenes between him and the client. Charitable societies or other institutions rendering aid to the indigent are not deemed to be such intermediaries."*

This rule seeks to preserve the independence and direct accountability of the lawyer to the client, without interference from non-lawyers or corporations. While Garfield AI in the United Kingdom manages to comply with such principles through a strict regulatory framework and a clearly defined chain of responsibility, the lack of equivalent regulatory guardrails in Nigeria for lay agencies could result in a Garfield-style platform violating this rule in at least two ways:

i. Intervention between a lawyer and his client: If a Nigerian Garfield AI platform directly interacts with clients, collects fees, and delivers outputs even under the supervision of a lawyer, it may still be seen as intervening between the lawyer and the client, especially where the lawyer is not the primary point of contact or does not have direct control over client communications.

ii. Corporate Control or Exploitation: If the AI platform is owned by a tech company or operated as a separate entity outside a traditional law firm structure, the lawyer may be viewed as permitting a lay corporate agency to control or exploit their professional services, leading to a direct breach of Rule 4.

That said, it is important to restate that an AI styled law firm like Garfield was specifically enacted for the purposes of debt recovery in small claim matters.

In light of this, a fully powered AI law firm which essentially advises litigants, evaluates claims, and generates documents to help users represent themselves in court, may find a fitting operational context within Nigeria's Small Claims Court framework. Since these courts are specifically designed to be informal, fast-paced, and accessible to self-represented parties, the use of AI to support pro se ²¹ litigants does not necessarily violate the spirit of legal practice restrictions, so long as the platform does not present itself as a substitute for a lawyer. This suggests a potential pathway for pilot implementation, especially where AI is positioned not as a substitute for legal advice, but as an accessibility tool for claimants who are legally permitted to act on their own behalf.

Nonetheless, even if the AI itself operates within these limits, the lawyer supervising may still risk breaching the RPC, particularly Rules 3 and 4 which deal with enabling the unauthorized practice of law or permitting a lay entity to exploit professional services. Since the application of these provisions to AI remains legally untested, their interpretation ultimately lies with the courts, and until clarified, the lawyer's role in such platforms raises ethical and professional concerns.

Fragmented Legal Resources

Arguably, the biggest challenge to implementing an AI law firm in Nigeria to recover small claims debts throughout the country is the lack of digital infrastructure. A critical technical limitation in Nigeria is that laws and regulations are not centrally codified or digitally structured. Unlike the UK, where statutes, practice directions, and court forms are available through structured databases, Nigeria's legal framework is fragmented across multiple government portals, PDF files, and outdated websites.

Small Claims Courts in Nigeria are also governed by state-level rules with varying procedures and monetary thresholds and as such an AI system would require customization for each jurisdiction. The inconsistency and inaccessibility of legal data across jurisdictions, would certainly lead to legal inaccuracies, undermining the very efficiency AI is meant to provide.

Conclusion

While the success of Garfield AI in the United Kingdom signals a promising future for AI-powered legal service delivery, its replication in Nigeria is not without significant regulatory, ethical, and infrastructural challenges. From the professional obligations under the Rules of Professional Conduct to the fragmented state of Nigeria's legal data infrastructure, a direct transplant of the Garfield model would currently be impossible.

However, the Nigerian Small Claims Court framework, designed for self-representation and simplified procedures offer a potential entry point for AI-assisted legal tools focused on access to justice. For such innovation to take root, Nigeria must pursue digital codification of its laws and clear judicial and institutional guidance on how existing rules apply in the context of AI. Garfield AI should not be viewed as a finished product to be copied, but as a blueprint to be localized - carefully, lawfully, and strategically for Nigeria's unique legal ecosystem.

²¹ Latin for self or "in one's own behalf."

Babalakin & Co. possesses extensive expertise at the intersection of law and technology and remains at the forefront of advising clients on the rapidly evolving legal landscape surrounding Artificial Intelligence. For further information or enquiries on the issues discussed in this article, please contact:



FOLUSO OLUSANYA
folusanya@babalakinandco.com
Associate

—OFFICE LOCATIONS—

LAGOS OFFICE

1261A, Adeola Hopewell Street 4
Victoria Island,
Lagos State.
+234-2702802, 2718806, 2718808,
2718711, 2718800-4, 2718700-9

ABUJA OFFICE

4, River Benue Street,
Off Ibrahim Babangida Boulevard,
Maitama District,
Abuja,
+234-9-2780930, 2780933-9

PORT HARCOURT OFFICE

3, Williams Jumbo Street,
Old GRA, Port Harcourt
Rivers State
+234-703506876