

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON**

GREEN BUILDING INITIATIVE, INC., an
Oregon non-profit corporation

Plaintiff,

v.

STEPHEN R. PEACOCK, an individual
residing in California; and **GREEN GLOBE
LIMITED**, a company based in the United
Kingdom,

Defendants.

Case No. 3:24-cv-298-SI

**ORDER RESOLVING ORDER
TO SHOW CAUSE**

Michael H. Simon, District Judge.

On October 27, 2025, the Court ordered Plaintiff and its counsel to show cause why the Court should not impose sanctions against them for using fake, or “hallucinated,” case citations in Plaintiff’s reply brief filed in support of Plaintiff’s motion for interim attorney fees. ECF 87. The Court has closely read Plaintiff’s response (ECF 88) and the accompanying declarations of Daniel P. Larsen (ECF 89), David J. Elkanich (ECF 90), and David A. Bernstein (ECF 91). The Court is satisfied with the remedial actions already taken and those proposed to be taken by Plaintiff’s counsel and thus will not be imposing any formal sanctions.

IT IS SO ORDERED.

DATED this 12th day of November, 2025.

/s/ Michael H. Simon
Michael H. Simon
United States District Judge