# THE ROLE OF ARTIFICIAL INTELLIGENCE IN NIGERIAN LEGAL RESEARCH: PROSPECTS AND CHALLENGES\*

#### **Abstract**

Artificial Intelligence (AI) is changing how legal research is done worldwide, and Nigeria is no exception. What once required hours of flipping through law reports and textbooks can now be done in minutes with AI-powered legal tools, which makes legal research faster, more efficient, and more accessible. But with this transformation comes a set of difficult questions: Can AI-generated legal research be trusted? Who is responsible if an AI tool gives inaccurate legal advice? Will AI replace human lawyers or simply make their work easier? This paper examines the role of AI in Nigerian legal research, exploring both its potential and its pitfalls. It looks at how AI is already being used by Nigerian lawyers, the ethical and legal challenges that come with it, and how other countries are regulating AI in legal practice. Drawing insights from global AI frameworks, this study proposes recommendations to ensure that AI in Nigerian legal research is used responsibly, ethically, and in a way that strengthens, rather than weakens, the legal profession.

**Keywords:** Artificial Intelligence (AI), Legal research, Nigerian legal system.

#### 1. Introduction

For decades, legal research in Nigeria has followed the same slow, painstaking process - leafing through hardcover law reports, consulting textbooks, and cross-referencing multiple statutes. Even with the introduction of digital law databases like LawPavilion and Legalpedia, the process remains largely manual, thus, it demands hours of effort to extract relevant case law or statutory provisions. However, the rise of Artificial Intelligence (AI) is quietly reshaping this landscape. What used to take days of digging through dusty law libraries can now be done in minutes with AI-powered legal research tools. Research is also made easier with automated case law searches and even AI-generated legal opinions (via chatbots).

Globally, AI is already playing a huge role in legal systems. Platforms like ROSS Intelligence (before it shut down), LexisNexis AI tools, and Westlaw Edge are helping lawyers find case precedents faster, predict case outcomes, and even draft legal documents. For instance, the European Court of Human Rights (ECHR) experimented with AI-powered translation systems to provide multilingual access to judgments. In some pilot programs, AI systems have been used to predict the likelihood of human rights violations based on previous case patterns. Although these tools are still in their experimental stages, they signal a future where AI could play a bigger role in judicial decision-making.

AI in Nigerian legal research is no longer a futuristic idea, it's already happening. Recognizing the rapid evolution of legal technology, the Nigerian government has begun pushing for a tech-driven

<sup>\*</sup>Emeka Chukwudifu Earnest, Lecturer, Faculty of Law Alex Ekwueme Federal University Ndufu Alike Ebonyi state, Nigeria; Email: chukwudifu.emeka@funai.edu.ng; emekachukwudifu68@gmail.com; \*\*Gabriel Ugota Awoke, Lecturer, Faculty of Law Alex Ekwueme Federal University Ndufu Alike Ebonyi state, Nigeria; Email: gabrielugota@gmail.com; \*\*\*Rev. Fr.(Barrister) L.O. Emeka, Email: Ossyemeka2@gmail.com; and\*\*\*\*Obiahu Blessing Chidiebere, student; Nigerian Law School, Enugu Campus +2348129688437, blessingebere4477@gmail.com.

<sup>&</sup>lt;sup>1</sup>Daniel K, 'Contemporary Issues Affecting the Legal Profession in Africa' https://afribar.org/wp-content/uploads/2023/08/PP-W-01-Contemporary-Issues-Affecting-the-Legal-Profession-in-Africa-By-DANIEL-K.-KIP.pdf accessed 15 March 2025.

<sup>&</sup>lt;sup>2</sup>Biresaw S, 'The Impacts of Artificial Intelligence on Research in the Legal Profession', (2022) 5 *International Journal of Law and Society* 53, 65 <a href="https://doi.org/10.11648/j.ijls.20220501.17">https://doi.org/10.11648/j.ijls.20220501.17</a> accessed 15 March 2025.

<sup>&</sup>lt;sup>3</sup>Kjær AL, 'Translation of Judgments of the European Court of Human Rights into Non-official Languages: The Politics and Practice of European Multilingualism' (University of Copenhagen Faculty of Law Research Paper No 2020-89, 31 October 2019) https://ssrn.com/abstract=3478529 accessed 15 March 2025 (forthcoming in Anne Lise Kjær and Joanna Lam (eds), *Language and Legal Interpretation in International Law* (Oxford Studies in Language and Law, Oxford University Press)).

legal system, as seen in initiatives like The Nigeria Data Protection Act (NDPA) 2023<sup>4</sup> (which covers how AI and digital platforms handle legal data), and The National Artificial Intelligence Strategy<sup>5</sup> (aimed at creating a main regulatory framework for AI in Nigeria).

Despite these advancements, there remains a critical problem: accuracy. AI models like ChatGPT, Claude, and Gemini were trained on global datasets, meaning they often lack a deep understanding of Nigeria's legal system, case precedents, and statutory authorities. This raises concerns about reliability, legal accuracy, and even ethical responsibility when lawyers use them for research.

To bridge this gap, Nigerian legal tech leader LawPavilion developed LawPavilionGPT—an AI tool specifically trained on Nigerian legal research materials. Unlike generic AI systems, LawPavilionGPT understands the nuances of Nigerian law, drawing from over 60 years of Nigerian judicial precedents, Nigerian statutory authorities and regulations, Local legal texts and judicial reasoning patterns.

The Nigerian legal system, often criticized for its slow pace and procedural bottlenecks, stands to benefit significantly from innovations like these. But like every technological advancement, AI in legal research doesn't come without its own set of ethical, legal, and infrastructural challenges.

## 2. Concept of Artificial Intelligence in Legal Research

According to Brittanica, Artificial Intelligence refers to the ability of a digital computer or computer-controlled robot to perform tasks commonly associated with intelligent beings. The term is frequently applied to the project of developing systems endowed with the intellectual processes characteristic of humans, such as the ability to reason, discover meaning, generalize, or learn from past experience.<sup>7</sup>

AI in legal research works by processing large volumes of legal texts - case law, statutes, and academic articles, to extract relevant information faster than any human could. These tools can identify patterns in case judgments, predict possible legal outcomes, and even automate the drafting of legal documents. However, while these tools offer speed and convenience, they also raise accuracy, bias, and ethical concerns, especially in a legal system where precision is everything.

Traditionally, legal research in Nigeria has been manual and time-consuming. The process typically involves consulting hardcover law reports like the Nigerian Weekly Law Reports (NWLR) or Supreme Court Reports, flipping through textbooks and digests for case summaries, cross-referencing statutes and regulations in printed law books, and spending hours at court libraries to find the most recent authorities. This method not only slows down legal practice but also limits access to justice, especially for young lawyers, legal aid clinics, and smaller firms that cannot afford comprehensive legal libraries (especially given the dynamic nature of the law).

However, the last decade has seen a gradual shift towards digital legal databases. Platforms like LawPavilion and Legalpedia have digitized thousands of Nigerian case laws, making legal research

<sup>&</sup>lt;sup>4</sup> Federal Republic of Nigeria. (2023). Nigeria Data Protection Act 2023. Official Gazette.

<sup>&</sup>lt;sup>5</sup> National Information Technology Development Agency (NITDA). (2023). National Artificial Intelligence Policy Framework. https://nitda.gov.ng.

<sup>&</sup>lt;sup>6</sup>Introducing LawPavilionGPT: The AI Redefining Legal Research for Nigerian Lawyers' (*LawPavilion Blog - No1 legaltech resource in Africa*22 August 2024) <a href="https://lawpavilion.com/blog/introducing-lawpaviliongpt-the-ai-redefining-legal-research-for-nigerian-lawyers/">https://lawpavilion.com/blog/introducing-lawpaviliongpt-the-ai-redefining-legal-research-for-nigerian-lawyers/</a> accessed 13 March 2025.

<sup>&</sup>lt;sup>7</sup>Copeland BJ, 'Artificial Intelligence (AI) | Definition, Examples, Types, Applications, Companies, & Facts' (*Encyclopedia Britannica*20 July 1998) <a href="https://www.britannica.com/technology/artificial-intelligence">https://www.britannica.com/technology/artificial-intelligence</a> accessed 15 March 2025.

faster and more accessible. But even these platforms still require manual input from the lawyer to identify relevant authorities.

These platforms are mostly search-based, not intelligence-based, meaning they only return results that match the lawyer's search keywords. The burden of analyzing the search results and identifying the most relevant cases still falls entirely on the lawyer. AI is pushing this transition further by shifting from search-based legal research to intelligence-based research. Instead of just retrieving cases, AI tools can now analyze legal documents, rank search results by relevance, and even generate case summaries automatically.

#### 3. Prospects of AI in Nigerian Legal Research

Artificial Intelligence (AI) is reshaping how legal research is done in Nigeria. For years, lawyers have struggled with slow research processes, high costs, and limited access to legal resources. AI presents a unique opportunity to change this and offers faster, cheaper, and more efficient legal research tools. While still in its early stages, AI has the potential to make Nigerian legal research more accessible and effective for both established firms and smaller legal practitioners in these ways:

## (i) Speeding up Legal Research

One of the most immediate benefits of AI in legal research is how much time it saves. What once took hours, and sometimes even days of flipping through law reports and textbooks can now be done in minutes with AI-powered tools. For instance, ChatGPT can generate quick case summaries or explain legal concepts based on user prompts. LawPavilion Prime uses AI algorithms to suggest case citations and rank search results by relevance. LawPavilionGPT goes even further by generating well-rounded legal opinions, complete with case law and legislative citations. With the sheer volume of Nigerian case law, especially from the Court of Appeal and Supreme Court, having an AI-powered system that can filter, rank, and highlight relevant authorities makes legal research faster and more precise.

#### (ii) Case Prediction & Analysis

One of AI's most exciting prospects is its ability to predict case outcomes based on precedent. In more developed legal systems like the US, AI tools like Westlaw have been used to predict how judges might rule based on historical patterns. Although Nigerian AI tools haven't reached this level of sophistication yet, there is huge potential for predicting likely case outcomes based on similar past judgments, analyzing patterns in a judge's previous rulings, and identifying winning legal arguments in particular areas of law. For example, an AI system trained on Nigerian electoral petition cases could predict the likelihood of success in election disputes based on factors like evidence presented, the judge's past rulings, and precedent from higher courts. If properly developed, predictive AI could help lawyers weigh their chances before filing suits and even help judges maintain consistency in their rulings.

#### (iii) Automating Repetitive Tasks

Legal research often involves tedious, repetitive tasks like drafting contracts, reviewing documents for errors, summarizing case laws, checking citations, among others. AI can automate many of these tasks, freeing up lawyers to focus on higher-level legal reasoning.

#### (iv) Access to Justice Tools

AI isn't just about making lawyers' jobs easier, it can also help everyday Nigerians bridge the information gap and access legal information without having to hire a lawyer. One of the most

<sup>&</sup>lt;sup>8</sup> Faggella D, 'AI in Law and Legal Practice - a Comprehensive View of 35 Current Applications' (Emerj Artificial Intelligence Research28 November 2017) <a href="https://emerj.com/ai-in-law-legal-practice-current-applications/">https://emerj.com/ai-in-law-legal-practice-current-applications/</a>> accessed 15 March 2025.

promising applications of AI is legal chatbots, which is AI-powered tools that provide free legal advice to people who can't afford a lawyer.

Globally, chatbots like DoNotPay, dubbed the "world's first robot lawyer," are already helping people fight parking tickets, navigate small claims court, and even apply for asylum. The platform uses AI to guide users through legal processes, generating the necessary documents and providing step-by-step instructions. This is helpful for people to understand their legal rights and the next steps they can take.

# (v) Bridging the Research Gap for Underfunded Legal Clinics and Small Law Firms

One of the biggest inequalities in Nigerian legal research is that large law firms have access to expensive legal research tools, while smaller firms and legal aid clinics struggle to afford them. AI could help level the playing field by making legal research tools cheaper and more accessible.

Right now, platforms like LawPavilion and Legalpedia require paid subscriptions, which can be expensive for small firms and pro bono legal clinics. AI tools like ChatGPT already allow small firms to generate basic legal opinions and case summaries for free. If Nigerian legal tech companies develop more affordable, localized AI tools, it could drastically improve access to legal research for underfunded legal practitioners.

#### 4. Challenges of AI in Nigerian Legal Research

Artificial Intelligence (AI) has the potential to transform legal research in Nigeria, making it faster, more efficient, and widely accessible. However, its adoption also comes with serious challenges that must be addressed to ensure it enhances rather than disrupts the legal profession. These challenges fall into three main areas: legal, ethical, and institutional.

# 4.1 Legal Challenges

#### (i) Data Privacy

One of the biggest legal concerns with AI in Nigerian legal research involves data privacy. Legal research often requires handling sensitive client information, particularly in areas like family law, immigration, and criminal defense. With AI-powered tools like ChatGPT and LawPavilion, concerns have emerged about how these platforms collect, process, and store legal data.

The Nigeria Data Protection Act (NDPA) 2023 serves as the primary law governing data privacy in Nigeria. Under Section 24<sup>10</sup>, data controllers—including legal tech companies—must obtain clear consent from users before processing their personal data. However, most AI platforms currently used in Nigeria, including ChatGPT, do not fully comply with these standards. This raises a critical legal question: Can Nigerian legal tech companies process client data under the NDPA without violating confidentiality laws? Without strict oversight, lawyers using AI tools risk exposing confidential client information to unauthorized third parties.

# (ii) Intellectual Property Rights

AI's growing role in legal research has also raised serious copyright concerns, particularly when AI tools use protected legal content to train their models. A notable example is *Thomson Reuters v. Ross* 

<sup>&</sup>lt;sup>9</sup> 'Law & AI: Who's Keeping the Order? – Solveo' (*Solveo.co*2024) <a href="https://solveo.co/law-ai-whos-keeping-the-order/#:~:text=Chatbots%20like%20DoNotPay%2C%20dubbed%20the,step%2Dby%2Dstep%20instructions.">https://solveo.co/law-ai-whos-keeping-the-order/#:~:text=Chatbots%20like%20DoNotPay%2C%20dubbed%20the,step%2Dby%2Dstep%20instructions.</a> accessed 15 March 2025.

<sup>&</sup>lt;sup>10</sup> Nigeria Data Protection Act 2023, s 24.

*Intelligence*, where the U.S. District Court for the District of Delaware ruled that Ross Intelligence violated copyright laws by using Westlaw's headnotes editorial summaries of legal rulings, to develop an AI-driven legal research tool.

Thomson Reuters argued that Ross had copied these headnotes without permission, while Ross claimed that its use fell under fair use because it was transforming the material into an innovative AI product. The court disagreed, ruling that Ross's tool directly competed with Westlaw, making its use of copyrighted material an infringement.

For Nigeria, this case highlights an urgent issue: Can Nigerian AI legal research tools use court judgments, law reports, or legal textbooks without infringing on copyright laws? Since AI requires large amounts of legal text to function, defining the line between fair use and copyright infringement will be crucial for the future of AI-powered legal research in Nigeria.

# (iii) Admissibility of AI-Generated Legal Opinions in Court

Another unresolved question is whether AI-generated legal research and opinions can be admitted as evidence in Nigerian courts. The Nigerian Evidence Act 2011 recognizes computer-generated documents as admissible under Section 84<sup>12</sup>, but only if they meet certain conditions—such as proving that the computer was functioning properly at the time. However, Nigerian courts have not yet ruled on whether AI-generated legal arguments or case summaries qualify under this law.

If a lawyer submits a ChatGPT-generated legal opinion, will a judge accept it as reliable evidence? If an AI-powered system misinterprets a legal principle, can its findings be legally challenged? Without clear judicial guidance, the use of AI in Nigerian court proceedings remains uncertain.

# (iv) Liability for AI-Driven Decisions

As AI becomes more embedded in legal research and decision-making, the issue of liability becomes increasingly important. If an AI tool provides incorrect legal information, who should take responsibility - the lawyer using it, the AI developer, or the institution that deployed it?

A significant Nigerian case addressing AI-related liability is Araka v. E-Cart, where an AI-powered fraud detection system played a key role in determining liability. The plaintiff, Chukwunweike Araka, sued E-Cart Internet Services Nigeria Limited (owners of Jumia Nigeria), arguing that its AI fraud detection system had flagged a suspicious transaction but failed to block it, leading to financial loss. Justice Binta Nyako ruled that E-Cart was partly liable, emphasizing that while AI improves fraud detection, the company remains responsible for ensuring its systems function properly.

This ruling has broader implications for AI-driven legal research. If AI-powered research tools misinterpret case law or cite nonexistent legal authorities, should responsibility fall on the lawyer using the research tool or the AI company that developed it? Can an AI-generated legal opinion be challenged or invalidated in court if it leads to a flawed legal argument?

#### 4.2 Ethical Challenges

#### (I) Bias in AI Algorithms

AI systems depend entirely on the data they are trained on, which means they can only be as fair and accurate as their source material allows. Many widely used AI tools such as ChatGPT are trained on Eurocentric legal datasets, making them less suited to the unique structure of Nigerian law. An AI

<sup>&</sup>lt;sup>11</sup>Thomson Reuters Enterprise Centre GmbH v ROSS Intelligence Inc (US District Court, District of Delaware, 11 February 2025) No 1:20-cv-00613.

<sup>&</sup>lt;sup>12</sup>Evidence Act 2011, s 84.

<sup>&</sup>lt;sup>13</sup>Araka v E-Cart Internet Services Nigeria Ltd & Anor (2024) FHC/ABJ/CS/975/2024.

model that has primarily learned from American or British case law may suggest foreign legal doctrines that do not align with Nigerian legal principles, leading to misleading or incomplete legal opinions.

Even AI platforms designed for Nigeria, such as LawPavilion, rely heavily on older case laws. This raises concerns that outdated gender, ethnic, or socioeconomic biases could be reinforced rather than corrected. Since law evolves over time, an effective AI system should be able to self-update and refine its research capabilities. However, in a country where most legal records are not fully digitized, keeping AI tools up to date presents a major challenge.

#### (ii) Confidentiality Risks

Confidentiality is a fundamental duty in legal practice, as required by Rule 19 of the Nigerian Rules of Professional Conduct (RPC). Lawyers are expected to protect client information, but using public AI tools like ChatGPT could put that confidentiality at risk. Many AI platforms store user inputs temporarily to refine their models, meaning that sensitive legal discussions could end up on remote servers without the lawyer's knowledge or consent.

This raises serious ethical and legal concerns - if confidential legal data is processed by an AI system, can it be considered secure? Can a lawyer be held liable if client information is unknowingly exposed through an AI-assisted research tool? Without clear regulations, the risks remain uncertain.

#### (iii) The Question of Authorship

Another ethical issue concerns who should take credit for AI-assisted legal work. If a lawyer uses ChatGPT to draft a legal argument or opinion, can they rightfully claim sole authorship, or should they acknowledge the role of AI? Traditional legal writing assumes that human judgment and reasoning are involved, but AI-generated legal opinions blur this distinction.

Currently, Nigeria has no legal framework addressing AI-generated legal research. <sup>15</sup> Without official guidance, lawyers must navigate the grey area between human and AI authorship on their own.

# 4.3 Institutional Challenges

#### (i) Poor Digitization of Nigerian Case Laws

A major obstacle to AI adoption in Nigerian legal research comes from the lack of digitized case laws. Unlike the UK and the US, where most court decisions are available in well-organized digital databases, many Nigerian judgments remain in hardcopy or spread across multiple private platforms. AI tools rely on large, structured datasets to function effectively, but without a centralized and comprehensive digital archive of Nigerian case law, they struggle to deliver accurate search results or meaningful legal analysis.

#### (ii) Lack of Centralized Legal Databases

At present, no single platform offers Nigerian lawyers access to all case laws, statutes, and regulations in one place. Instead, they must navigate multiple subscription-based services such as LawPavilion, NWLR Online, Legalpedia, and Primsol, each covering different sets of cases. This fragmentation limits AI systems from analyzing a complete pool of Nigerian legal data, reducing their usefulness for legal research and case prediction. A unified, publicly accessible database would remove this barrier and allow AI tools to function with greater accuracy and reliability.

<sup>&</sup>lt;sup>14</sup>Rules of Professional Conduct for Legal Practitioners 2007, r 19.

<sup>&</sup>lt;sup>15</sup> Blessing Obiahu, Regulating Artificial Intelligence in Nigeria: Balancing Innovation with Ethical and Legal Considerations (Nigerian Journals Online, 2024).

<sup>&</sup>lt;a href="https://www.nigerianjournalsonline.com/index.php/FUNAILAWPROJECTS/article/download/5559/5399">https://www.nigerianjournalsonline.com/index.php/FUNAILAWPROJECTS/article/download/5559/5399</a> accessed 15 March 2025.

## (iii) Lawyers' Tech-Phobia and Unwillingness to Adopt AI Tools

Beyond technical issues, the legal profession itself presents a challenge to AI adoption. Many Nigerian lawyers, especially senior practitioners, remain skeptical of AI tools, often preferring manual legal research. This reluctance comes from concerns about job security, trust in AI accuracy, and limited exposure to digital tools. Without structured training and awareness programs, AI adoption may remain limited to younger lawyers and tech-focused firms, leaving a significant portion of the legal profession behind.

Despite these challenges, solutions exist. With the right regulatory framework, ethical guidelines, and institutional reforms, Nigeria can embrace AI in legal research in a way that improves access to justice, strengthens legal efficiency, and ensures that small law firms are not left behind in the digital transformation of the legal profession.

# 5. Comparative Analysis of AI Implementation Globally

AI regulation is still a moving target globally, with different countries adopting different approaches to balance innovation with ethical and legal concerns. While Nigeria is still grappling with the early stages of AI adoption in legal research, countries like the European Union (EU) and the United States (US) are already laying down frameworks to govern AI's use across various sectors, including the legal profession.

## 5.1 The EU Approach

The European Union's AI Act<sup>16</sup>, officially passed in June 2024, is the world's first comprehensive legal framework for regulating AI systems. Although the Act applies across multiple sectors, it has specific provisions addressing AI systems used in legal practice.

The EU's regulatory approach follows a risk-based model, which classifies AI systems into four categories based on the level of risk they pose. Below is a table showing these different risk levels:

RISK CATEGORY	EXAMPLES	REGULATORY APPROACH
Unacceptable Risk	Social scoring systems	Outright ban
High Risk	AI used in court decision- making	Strict compliance requirements (human oversight, transparency)
Limited Risk	Chatbots, legal research tools	Lighter transparency obligations
Minimal Risk	Spam filters, AI search engines	No specific regulations

In terms of legal research, the Act classifies AI systems used in legal decision-making and case prediction as high-risk systems, subjecting them to mandatory human oversight, clear documentation of how the AI model works, periodic independent audits, and transparency requirements on data sources and algorithms.

<sup>&</sup>lt;sup>16</sup> Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 on Artificial Intelligence [2024] OJ L 234/1.

However, AI tools used only for legal research purposes (like ChatGPT or LawPavilion) fall under the limited risk category, which requires only basic transparency about how the AI generates its outputs.

# Nigeria Can Borrow from the EU Approach, to wit:

- (i) Risk-based regulation treating predictive AI differently from basic research tools;
- (ii) Transparency requirements for all legal tech platforms;
- (iii) Mandatory human oversight for AI tools used in case prediction or evidence gathering; and
- (iv) Regular audits of AI models to prevent algorithmic bias.

# 5.2 The US Approach

Unlike the EU, the United States has taken a more hands-off approach to AI regulation, relying largely on self-regulation by tech companies and occasional interventions through case law.

There are currently no federal laws in the US specifically regulating AI in legal practice. Instead, the American Bar Association (ABA) has issued non-binding ethical guidelines on how lawyers should use AI tools, emphasizing client confidentiality, human oversight, and transparency in disclosing AI assistance.<sup>17</sup>

Most AI-related legal issues in the US have been addressed through case law, such as the landmark State of Wisconsin v. Loomis case, where the court upheld the use of AI in criminal risk assessments despite concerns about transparency.

Nigeria Can Borrow from the US Approach as follows:

- (i) Flexible, innovation-friendly regulatory framework;
- (ii) Ethical guidelines for lawyers using AI tools; and
- (iii) Industry self-regulation through codes of conduct.

# **Key Differences Between the EU and US Approaches:**

FEATURE	EU APPROACH	US APPROACH
Regulation Type	Command-and-Control	Self-Regulation
Focus	Risk-based	Ethical guidelines
Transparency Rules	Mandatory for most AI tools	Voluntary
Human Oversight	Mandatory for high-risk AI	Recommended, not required
Innovation Impact	May slow down innovation	Encourages faster innovation

Neither the EU's command-and-control model nor the US's self-regulatory approach would fully work in Nigeria's unique context. Nigeria needs a regulatory framework that balances innovation with ethical oversight, which will promote AI adoption without leaving legal researchers and clients vulnerable to bias, data breaches, or misinformation. In essence, a hybrid approach that combines elements of both the EU and US models could provide the most suitable regulatory framework for Nigeria. This would allow Nigeria to encourage AI adoption while addressing ethical risks and data privacy concerns.

<sup>&</sup>lt;sup>17</sup>'ABA Issues First Ethics Guidance on a Lawyer's Use of AI Tools' (*Americanbar.org* 2024) <a href="https://www.americanbar.org/news/abanews/aba-news-archives/2024/07/aba-issues-first-ethics-guidance-ai-tools/">https://www.americanbar.org/news/abanews/aba-news-archives/2024/07/aba-issues-first-ethics-guidance-ai-tools/</a> accessed 15 March 2025.

#### 6. Conclusion

Artificial Intelligence (AI) is no longer a futuristic idea in Nigerian legal research; it has already made an impact and is poised to make even more impact. AI tools now automate case law searches and assist lawyers in analyzing legal precedents, making legal research faster, more efficient, and more accessible. However, despite these advantages, AI introduces serious concerns about privacy, accuracy, bias, and professional responsibility. At present, no clear regulations exist to govern AI in Nigerian legal research, which exposes lawyers to risks such as data breaches, unreliable AI-generated research, and legal liability. This paper has examined both the benefits and risks of AI in Nigerian legal research, drawing lessons from how countries like the US and EU regulate AI. One key finding is that without proper oversight, AI may cause more harm than good, especially if lawyers and judges rely on it without verifying its accuracy. The recent Nigerian case of *Araka v E-Cart* confirms that Nigerian courts have started recognizing AI in legal decision-making. However, the legal system remains unprepared for the challenges AI presents. As Nigeria advances its National Artificial Intelligence Strategy and develops AI-specific legislation, this moment provides an opportunity to create a legal framework that fosters AI innovation while protecting legal ethics, privacy, and professional integrity.

Thus, for AI to be used responsibly in Nigerian legal research, clear ethical guidelines need to be put in place. The Nigerian Bar Association (NBA) should develop rules on transparency, human oversight, and client confidentiality when using AI tools in legal practice. At the same time, judges and lawyers need training on how to properly use AI in legal research, including how to spot biases and verify AI-generated legal opinions. The National Judicial Institute (NJI) should organize workshops to help legal professionals stay ahead of AI developments.

Since AI tools often process sensitive legal data, privacy laws must be strengthened. The Nigeria Data Protection Commission (NDPC) and National Information Technology Development Agency (NITDA) should introduce clear regulations to ensure that user consent is obtained, data is stored within Nigeria, and AI systems undergo independent audits to prevent misuse.

Finally, Nigeria needs its own AI-powered legal research tools to be trained specifically on Nigerian case law and statutes, just like the currently existing LawPavilionGPT, and not just foreign legal systems. Research institutions like the National Centre for Artificial Intelligence and Robotics (NCAIR) and university law faculties should take the lead in developing these tools, ensuring they reflect Nigeria's unique legal landscape and provide reliable, locally relevant research support.