DISRUPTING DATA CARTELS BY EDITING WIKIPEDIA

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Legal discourse in the digital public square is driven by memoranda, motions, briefs, contracts, legislation, testimony, and judicial opinions. And as lawyers are taught from their first day of law school, the strength of these genres of legal communication is built on authority. But finding that authority often depends on a duopoly of for-profit legal research resources: Westlaw and Lexis. Although contemporary legal practice relies on these databases, they are far from ethically neutral. Not only are these "data cartels" expensive—creating significant access to justice challenges—they also are controlled by parent companies that profit by providing information to Immigration and Customs Enforcement that is used to surveil, arrest, and deport immigrants, creating a sense of ethical unease in the colloquial sense. One way to make legal research (and by extension, legal practice) more publicly and ethically accessible is to find ways to increase the availability of alternative and supplemental options to research authority. That said, the challenge is that there are not enough free, public alternatives.

Wikipedia has the power to disrupt these data cartels and increase public access to legal information. The non-profit, publicly-funded encyclopedia that anyone can edit is already the silent first stop for many legal researchers including judges, lawyers, and the public. With expert editing by law students and junior lawyers Wikipedia could become much more than a first step. This Essay builds on the scholarly literature and multiple years of classroom experience to suggest that law students are particularly well-positioned to challenge the singular reliance on data cartels by reimagining Wikipedia's place in law and legal education. Further, teaching law students how to use and maintain Wikipedia sidesteps colloquial

ethical issues raised by data cartels and produces concrete benefits for students: editing Wikipedia creates substantive opportunities to investigate different genres of legal writing, allows integration of students' legal research and writing skills into practice, and instills ethical service obligations and provides professional identity formation opportunities during students' formative years. With proper training, law students can grow as lawyers and legal writers while also making significant and meaningful contributions to the accessibility of legal knowledge during law school and beyond by creating and editing Wikipedia articles that are free, accurate, and ethical sources of that knowledge.

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In 2014, one of us authored a student Note on nonconsensual intimate imagery, then often referred to as "revenge porn."[1] She began her research where many students, associates, clerks, and scholars often secretly do: Wikipedia.[2] Except there was nothing there. Despite the rising prevalence of revenge porn as a problem, no article existed.[3] As a longtime Wikipedia editor, she decided to create the article about revenge porn herself.[4] It mirrored aspects of her Note by discussing the usability of select legal doctrines and identifying potential hurdles to enforcement of existing laws.[5] It was just over 1,700 words long, with 43 footnotes.[6] It was featured on

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[1] Amanda Levendowski, *Using Copyright to Combat Revenge Porn*, 3 N.Y.U. INTELL. PROP. & ENT. L.J. 422, 422 (2014).

[2] Neil Thompson, Brian Flanagan, Edana Richardson, Brian McKenzie & Xueyun Luo, *Trial By Internet: A Randomized Field Experiment on Wikipedia's Influence on Judges' Legal Reasoning*, in CAMBRIDGE HANDBOOK OF EXPERIMENTAL JURISPRUDENCE. (Kevin Tobia ed., forthcoming 2023) (manuscript at 28), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4174200. Amanda previously advised the Wikimedia Foundation as an associate as Cooley, as well as a Clinical Teaching Fellow with the Technology Law and Policy Clinic. All discussion is based on publicly available information.

[3] United States v. Moore, Indictment, No. 2:13-CR-00917, https://cdn3.sbnation.com/assets/3902317/revenge-porn-moore-evens-indictment.pdf (C.D. Cal. Dec. 10, 2013) (indicting prolific nonconsensual intimate imagery website IsAnyoneUp's founder for hacking). Some scholars even called for criminalization. Danielle K. Citron & Mary Anne Franks, *Criminalizing Revenge Porn*, 49 WAKE FOREST L. REV. 345, 349 (2014).

[4] LiAnna Davis, *From Student to Professor: Amanda Levendowski*, WIKIEDU (Nov. 16, 2020), https://wikiedu.org/blog/2020/11/16/from-student-to-professor-amanda-levendowski/. The revenge porn article was created as an independent study, supervised by Chris Sprigman, believed to be the first of its kind at an American law school. To our knowledge, only one other comparable Wikipedia-editing independent study has been undertaken: it was by Yilu Zhang in 2017 to improve the chart of every Supreme Court trademark case article. *List of United States Supreme Court Case Law: Revision History*, WIKIPEDIA, https://en.wikipedia.org/w/index.php?title=List_of_United_States_Supreme_Court_trademark_case_law&action=history (last visited May 23, 2023). Zhang's project was completed under Professor Levendowski's supervision at NYU Law.

[5] Amanda Levendowski, *Revenge Porn*, WIKIPEDIA (Mar. 11, 2014), https://en.wikipedia.org/w/index.php?title=Revenge_porn&oldid=599174738. An archived version of the article is available by clicking "Oldest" in the "View History" tab on the article's page.

[6] *Id.* The Note itself, drafted in an advance copyright course, was more than 7,500 words long with 133 footnotes. Levendowski, *supra* note 1.

the Wikipedia homepage.[7] Today, the "revenge porn" Wikipedia article has been viewed more than three million times and has more than 500 subsequent contributors.[8] And at least a few of those views were for legal research. A New York judge cited the article for its definition of revenge porn in the state's first trial court decision on the issue.[9]

Her story should not be an outlier. Improving the encyclopedia anyone can edit is one of the most effective ways for law students to contribute to and publicly catalog legal conversations for the benefit of courts, scholars, students, *pro se* litigants, and the public at large. Despite Wikipedia's reputation as unreliable according to some,[10] the site is a trusted resource—even by judges. Judge Richard Posner has proclaimed that "Wikipedia is a terrific resource . . . Partly because it is so convenient, it often has been updated recently and is very accurate."[11] Its articles have a measurable impact on courts.[12] Almost every circuit court has cited Wikipedia, it has been used in both civil and criminal cases, and many parties have used it as evidence.[13] It's also freely and easily

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[7] *Template: Did You Know Nominations/Revenge Porn*, WIKIPEDIA (Nov. 13, 2013),
https://en.wikipedia.org/wiki/Template:Did_you_know_nominations/Revenge_porn.

[8] *Pageviews Analysis for Revenge Porn between 7/1/2015-7/31/2022*, PAGEVIEWS ANALYSIS, https://pageviews.wmcloud.org/?project=en.wikipedia.org&platform=all-access&agent=user&redirects=1&start=2015-07-01&end=2022-07-31&pages=Revenge_porn (last updated in 2022).

[9] People v. Barber, No. 2013NY059761 2014 N.Y. Slip Op. 50193(U), at *1 n.1 (N.Y. Crim. Ct. Feb. 18, 2014) ("This phenomenon has become common enough to have its own Wikipedia page, which defines the conduct as 'sexually explicit media that is publicly shared online without the consent of the pictured individual.' . . . That is precisely what is alleged in this case.").

[10] *See, e.g.*, *Texas Appellate Court Holds that Wikipedia Too Unreliable for Purposes of Judicial Notice*, LAW PROFESSOR BLOGS NETWORK: LEGAL WRITING PROF BLOG (Nov. 23, 2008), https://lawprofessors.typepad.com/legalwriting/2008/11/texas-appellate.html (citing unpublished Texas decision refusing to accept Wikipedia because of its "inherent unreliability.").

[11] Noam Cohen, *Courts Turn to Wikipedia, but Selectively*, N.Y. TIMES (Jan. 29, 2007), https://www.nytimes.com/2007/01/29/technology/29wikipedia.html.

[12] Thompson et al., *supra* note 2 at 28.

[13] Many citations are definitional, like the revenge porn example. *See, e.g.*, Del Grosso v. Surface Transp. Bd., 898 F.3d 139, 143 nn.5–6 (1st Cir. 2018) (citing Wikipedia for the definitions of "die" and "hopper car"); Smalls v. Collins, 10 F.4th 117, 129 n.5 (2d Cir. 2021) (citing Wikipedia for the definition of the term "butterfly knife"); Disabled in Action Penn. v.

accessible to anyone with an Internet connection, unlike expensive legal subscription services like Westlaw and Lexis.[14] But the value of editing Wikipedia does not only come from its impact. The process of editing presents a unique opportunity for law students and junior lawyers to become better legal researchers and writers.

Wikipedia includes thousands of articles about legal cases and doctrines, from tax to torts to trademarks.[15] These articles vary in quality and utility—some do not *Bluebook* case names or citations, others feature messy organization and poor draftsmanship, others only offer high-level descriptions of intricate legal concepts, others fail to account for jurisdictional differences in the law, still more only link to paywalled versions of decisions or sources, and some are simply "stubs," which are brief and incomplete.[16] These

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Southeastern Penn. Transp. Authority, 635 F.3d 87, 90 n.1 (3d Cir. 2011) (citing Wikipedia for the definition of SEPTA Regional Rail); United States v. Smith, 275 F. App'x 184, 184 n.1 (4th Cir. 2008) (citing Wikipedia for the definition of "peer-to-peer"); Cardoni v. Prosperity Bank, 805 F.3d 573, 576 n.2 (5th Cir. 2015) (citing Wikipedia for the definition of the Red River Showdown); Essex Ins. Co. v. Fidelity & Guar. Ins. Underwriters, 282 F. App'x 406, 408 (6th Cir. 2008) (citing Wikipedia for the definition of "membrane roofing"); Lubavitch-Chabad of Ill., Inc. v. Northwestern Univ., 772 F.3d 443, 444 (7th Cir. 2014) (Judge Posner discussing history of Hasidic Judaism); U.S. v. Bazaldula, 506 F.3d 671, 673 n.2 (8th Cir. 2007) (discussing "PIT maneuver[s]"); Bitton v. Gencor Nutrientes, Inc., 654 F. App'x 358, 361–62 (9th Cir. 2016) (discussing district court reliance on Wikipedia article); Weinbaum v. City of Las Cruces, 541 F.3d 1017, 1033 n.18 (10th Cir. 2008) (discussing articles about Columbus, Ohio, Long Beach, California, and Anchorage, Alaska); Boim v. Fulton Cnty. Sch. Dist., 494 F.3d 978, 983 (11th Cir. 2007) (citing Wikipedia for definition of "school shooting"); Google, Inc. v. Network-1 Techs., Inc., 726 F. App'x 779, 783–86 (Fed. Cir. 2018) (discussing use of Wikipedia by lower court); Cole v. Boeing Co., 75 F. Supp. 3d 70, 72 n.4 (D.D.C. 2014) (discussion of citing Wikipedia in D.C. and citing Wikipedia for the definition of "geospatial analysis"). Its use has also been criticized by a handful of courts. *See, e.g.*, Kole v. Astrue, No. CV 08-0411-LMB, 2010 WL 1338092, at *7 n.3 (D. Idaho Mar. 31, 2010) (admonishing that "Wikipedia is not a reliable source at this level of discourse").

[14] As of 2019, Westlaw subscriptions for solo practitioners only cover the cases and statutes for practitioners' state, require a one-year subscription, and start at $1,152.; comparable Lexis subscriptions begin at $900 a year, requires a three-year commitment, and is likewise limited to practitioners' jurisdiction. Bob Ambrogi, *Price Wars in Legal Research Mean Deals for Small Firms; I Compare Costs*, LAWSITES (May 23, 2019), https://www.lawnext.com/2019/05/price-wars-in-legal-research-mean-deals-for-small-firms-i-compare-costs.html.

[15] In English alone, Wikipedia includes 6,658,947 million articles. *Main Page*, WIKIPEDIA, https://en.wikipedia.org/wiki/Main_Page (last visited May 23, 2023).

[16] *Stubs*, WIKIPEDIA (last visted May 23, 2023), https://en.wikipedia.org/wiki/Wikipedia:Stub.

variations limit legal articles' findability, usability, and accessibility, all three of which present challenges—the solution is a powerful pedagogical opportunity. By learning how to edit Wikipedia, law students can investigate legal practice skills like genre discovery, integrate quintessential legal research and writing skills into practice, and instill lasting values of ethical service. While editing Wikipedia may feel far afield from the law school curriculum at first glance, the competencies necessary to edit effectively are central to law school coursework. This practice can be integrated in surprisingly simple but highly impactful ways.

Despite its promise, Wikipedia is far from perfect. Of the 1.5 million biographical articles on Wikipedia English, just 19% are about women.[17] Those articles are shorter, less well-sourced, and significantly more likely to be flagged by other editors as "not notable" and nominated for deletion than articles about men.[18] Women and nonbinary people are also underrepresented behind the scenes. In 2018, the Wikimedia Foundation released a report concluding that only 8.8% of contributors identified as female and 1% as nonbinary.[19] When the rare woman or nonbinary person edits, they may be met with harassment from other editors.[20] So-called Wikipedians are aware of the problem: it is meticulously discussed in the 94-footnote Wikipedia article "Gender Bias on Wikipedia," which cites many of the same sources we do.[21] Teaching law students to edit Wikipedia can counter both problems. As of 2016, most law students are women, and their editorial skills are a powerful

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[17] Francesca Tripodi, *Ms. Categorized: Gender, Notability, and Inequality on Wikipedia*, 21 NEW MEDIA & SOC'Y 1 (2021). Women editors are resisting this largely invisible form of sexism. *See, e.g.*, Sydney Page, *She's Made 1,750 Wikipedia Bios for Female Scientists Who Haven't Gotten Their Due*, WASH. POST (Oct. 17, 2022), https://www.washingtonpost.com/lifestyle/2022/10/17/jess-wade-scientist-wikiepdia-women.

[18] *Id.*

[19] *Community Insights/2018 Report/Contributors*, WIKIMEDIA FOUND. (Jan. 25, 23), https://meta.wikimedia.org/wiki/Community_Insights/2018_Report/Contributors.

[20] Emma Paling, *Wikipedia's Hostility to Women*, THE ATLANTIC (Oct. 21, 2015), https://www.theatlantic.com/technology/archive/2015/10/how-wikipedia-is-hostile-to-women/411619/.

[21] *Gender Bias on Wikipedia*, WIKIPEDIA (Jan. 25, 2023), https://en.wikipedia.org/wiki/Gender_bias_on_Wikipedia.

antidote to gender and other editorial biases reflected in the encyclopedia.[22]

This Essay makes the case that law students should edit Wikipedia in three parts. Part I explains why traditional legal research is ethically fraught. Colloquially, it's fraught because the parent companies of the dominant duopoly of subscription services, Westlaw and Lexis, collude with Immigration and Customs Enforcement (ICE) to exploit undocumented immigrants.[23] These services, which librarian and scholar Sarah Lamdan refers to as "data cartels," make some students feel ethically compromised in the colloquial sense.[24] Editing law-related Wikipedia articles empowers students to improve access to a free, more ethical alternative to these services as effective starting points for legal research.[25] Part II explores why editing Wikipedia builds crucial legal competencies, including genre discovery, legal research and writing skills, and professional identity formation.[26] Editing also honors students' ethical obligations to "cultivate knowledge of the law beyond its use for clients" using a familiar genre of communication at an important moment in the formation of their professional identity.[27] Part III then turns to the practical question of how law professors can integrate teaching Wikipedia into their already busy syllabi. This Essay concludes that integrating editing Wikipedia into the law school curriculum is not only possible but also important. Law students can transform an influential source of authority and research database

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[22] Elizabeth Olson, *Women Make Up Majority of U.S. Law Students for First Time*, N.Y. TIMES (Dec. 16, 2016), https://www.nytimes.com/2016/12/16/business/dealbook/women-majority-of-us-law-students-first-time.html.

[23] Sarah Lamdan, *When Westlaw Fuels ICE Surveillance: Ethics in the Era of Big Data Policing*, 102 N.Y.U. REV. L. & SOC. CHANGE 255 (2019) [hereinafter Lamdan, *Ethics in the Era of Big Data Policing*]; SARAH LAMDAN, DATA CARTELS: THE COMPANIES THAT CONTROL AND MONOPOLIZE OUR INFORMATION (2022) [hereinafter LAMDAN, DATA CARTELS].

[24] LAMDAN, DATA CARTELS, *supra* note 23. Sarah Lamdan has argued that using these services may also implicate form ethics rules for attorneys. Lamdan, *Ethics in the Era of Big Data Policing*, *supra* note 23.

[25] Sometimes Wikipedia also operates as an ending point. *See* Cohen *supra* note 11.

[26] *See* STANDARDS & RULES OF PROC. FOR APPROVAL OF L. SCHOOLS Standard 303 & 304 (AM. BAR ASS'N 2022-2023).

[27] MODEL RULES OF PRO. CONDUCT, Preamble & Scope 6 (AM. BAR ASS'N 2021), https://www.americanbar.org/groups/professional_responsibility/publications/model_rules_of_professional_conduct/model_rules_of_professional_conduct_preamble_scope/.

into a more accurate, more accessible resource for legal knowledge while simultaneously transforming into better lawyers.

I. ILLUMINATING THE HARMS OF DATA CARTELS

Unknown to many legal scholars and students, Westlaw and Lexis support the surveillance, incarceration, family separation, and deportation of undocumented immigrants.[28] Each service's parent corporations, Thompson Reuters and RELX Group, respectively, maintain contracts with ICE for sharing intimate data—such as license plate location data, utility information, and aggregated bundles of personal information like credit history and cell phone subscriber data—that are weaponized by law enforcement routinely.[29] The scale cannot be understated. In 2019, Thompson Reuters alone helped ICE track more than 500,000 people each month to the tune of $30 million in contracts.[30] As of 2021, Lexis's ICE contracts topped $22.1 million.[31] Reactions to the realization

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[28] Lamdan, *Ethics in the Era of Big Data Policing, supra* note 23. The influence of Sarah Lamdan's advocacy around this issue cannot be overstated. For a deeper dive into these issues, see LAMDAN, DATA CARTELS, *supra* note 23.

[29] *The Data Broker to Deportation Pipeline: How Thompson Reuters & LexisNexis Share Utility & Commercial Data with ICE*, JUST FUTURES LAW & MIJENTE (May 30, 2021), https://www.flipsnack.com/justfutures/commercial-and-utility-data-report/full-view.html; Sam Biddle, *LexisNexis to Provide Giant Database of Personal Information to ICE*, INTERCEPT (Apr. 2, 2021, 10:00 AM), https://theintercept.com/2021/04/02/ice-database-surveillance-lexisnexis/.
The CUNY Human Rights and Gender Justice Clinic, alongside Mijente, the Immigrant Defense Project, and the Center for Constitutional Rights has filed FOIA requests for additional information about both corporations' ICE contracts. Ian Head, *Freedom of Information Act Request: ICE and DHS Contracts with RELX Group and Thompson Reuters*, CTR. CONST. RIGHTS (Sept. 14, 2020), https://ccrjustice.org/sites/default/files/attach/2020/09/ICE_DHS_CCR_FOIA_%20Sept%202020.pdf. It has not been suggested that Westlaw and Lexis share search query data with law enforcement though. It is possible that controversial "keyword subpoenas" could be used by law enforcement to demand stored data from search engines, however, it is not impossible that the services could be compelled to share search data if they save it somewhere. For a deeper dive into keyword warrants, see Corin Faife, *Powerful Keyword Warrants Face New Challenge in Deadly Arson Case*, THE VERGE (Jul. 1, 2022), https://www.theverge.com/2022/7/1/23191406/denver-arson-google-keyword-warrant-challenge-constitutional-fourth-amendment-privacy.

[30] McKenzie Funk, *How ICE Picks Its Targets in the Surveillance Age*, N.Y. TIMES (Jun. 7, 2021), https://www.nytimes.com/2019/10/02/magazine/ice-surveillance-deportation.html.

[31] Yulanda Lui, *LexisNexis and I.C.E.: An Examination of LexisNexis' Human Rights Responsibilities*, 54 N.Y.U. J. INT'L L. & POL. ONLINE F. 70 72

that using data cartels for legal research is ethically fraught drove activist students to found Law Students Against ICE, an organization dedicated to resisting entrenchment of data cartels on law school campuses that pressured administrators to abandon both services.[32] However, legal practice coursework and librarian counseling tend to offer few research alternatives.[33] And, to date, no law schools have divested from the duopoly.

These services pose an existential threat to the safety of immigrants, leading Sarah Lamdan to conclude that "[a]s long as legal research companies play a role in enabling government and ICE surveillance—and it is clear that they do—the legal community should condemn them and replace their products with more ethical

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(2021), https://www.nyujilp.org/wp-content/uploads/2022/02/5-LexisNexis-and-ICE.pdf.

[32] Anna Nathanson, *Law Students Against ICE Takes on Westlaw & LexisNexis Data Contracts*, NAT'L LAWYERS GUILD (2022), https://www.nlg.org/guild-notes/article/law-students-against-ice-takes-on-westlaw-lexisnexis-data-contracts/; Josh Moody, *Law Students Protest Research Database Contracts with ICE*, INSIDE HIGHER ED (Dec. 6, 2021), https://www.insidehighered.com/news/2021/12/06/law-students-protest-lexisnexis-westlaw-contracts-ice. It was also the subject of student reporting. Justin Jung, *UCLA School of Law Holds Contracts with Companies Selling Personal Data to ICE*, DAILY BRUIN (Jul. 17, 2020, 10:00 AM), https://dailybruin.com/2020/07/17/ucla-school-of-law-holds-contracts-with-companies-selling-personal-data-to-ice; Suhail Gharaibeh, *Law Students Push for NYU to Cut Ties with Legal Databases Over ICE Links*, WASH. SQUARE NEWS (Oct. 8, 2021), https://nyunews.com/news/2021/10/08/nyu-law-coalition-protest-westlaw-lexisnexis-ice/.

[33] *See, e.g.*, Professor Christopher D. Soper, *Legal Research and Writing Syllabus*, UNIV. MINN. L. SCH. (2018), https://law.umn.edu/sites/law.umn.edu/files/syllabus/6003_legal_writing_syllabus_sp18_soper_0.pdf (opening semester with Westlaw and Lexis trainings and identifying only "Westlaw, LexisAdvance, and Bloomberg Law" as legal research providers); *Case Law Research Tutorial*, GEO. UNIV. L. CTR. LIBR. (May 2022), https://guides.ll.georgetown.edu/case_law_tutorial (discussing Westlaw and Lexis as the places to conduct legal research); AJ Blechner, *Legal Research Strategy*, HARV. L. SCH. LIBR. (Dec. 7, 2022) https://guides.library.harvard.edu/law/researchstrategy (recommending Westlaw, Lexis, and Bloomberg for legal research); *1L Research Guide: Research Process – All Steps*, U.C. BERKELEY SCH. L. LIBR. (Feb. 27, 2023), https://libguides.law.berkeley.edu/c.php?g=507592&p=6751744 (assuming students use Westlaw and Lexis); *Alphabetical List of Guides*, GALLAGHER L. LIBR. UNIV. WASH. (May 19, 2023), https://liblawuw.libguides.com (pointing students to Westlaw, Lexis, and Bloomberg databases); *Approaching Your First Research Assignment: Introduction*, LOYOLA U. CHI. SCH. OF L. LIBR. (Apr. 27, 2023), https://lawlibguides.luc.edu/firstyearlegalresearch/researchstrategy#s-lg-box-wrapper-15540014 (urging students to update research using Westlaw, Lexis, and Bloomberg).

alternatives."[34] By editing Wikipedia, students can shape one of those more ethical alternatives.

II. IMPROVING ETHICAL ACCESS TO LAW PRESENTS PEDAGOGICAL OPPORTUNITIES

Integrating Wikipedia editing into the law school curriculum strengthens the development and empowerment of future lawyers. Law students traditionally complete coursework in legal research, analysis, and writing in their first year. These courses are meant to teach law students the bread-and-butter of practicing law: to "develop, refine, and articulate their legal analysis in a sophisticated and effective manner,"[35] become "practice-ready,"[36] and graduate with the ability to "write competent legal documents in both the litigation and transactional contexts."[37] Students continue this journey in second- and third-year coursework in the form of advanced legal writing courses, writing-based seminars, clinics, and other experiential courses in which they practice writing like lawyers under the supervision of faculty.

The ultimate goal of teaching legal research, writing, and analysis in such courses is to produce future lawyers who can effectively and ethically serve clients. After completion, these newly minted attorneys will be equipped to research the law relevant to a set of facts, analyze the law's application to those facts, and communicate that analysis to multiple audiences. Integrating Wikipedia editing into their curriculum furthers this goal in two ways: first, by teaching genre discovery as part of a lawyer's core legal research, analysis, and writing skills and second, by instilling ethical service obligations as part of lawyers' developing

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[34] Lamdan, *Ethics in the Era of Big Data Policing, supra* note 23. Doing so is also feminist. *See* Amanda Levendowski, *Defragging Feminist Cyberlaw*, 37 BERKELEY TECH. L.J. (forthcoming 2024) (on file with author). Additionally, for some student attorneys, total avoidance for Westlaw and Lexis is impractical and may even create different ethical issues regarding attorneys' diligence. *See* MODEL RULES OF PRO. CONDUCT r. 1.3 (AM. BAR ASS'N 2021).

[35] *See* First Year Legal Practice Program, GEO. UNIV. L. CTR., https://www.law.georgetown.edu/academics/courses-areas-study/legal-writing-and-student-scholarship/first-year-research-and-writing-program/ (last visited Jan. 21, 2023).

[36] *See* Legal Method and Writing, ARIZ. STATE UNIV. SANDRA DAY O'CONNOR COLL. L., https://law.asu.edu/programs/legal-method-writing (last visited Jan. 21, 2023).

[37] *See id.*

professional identities. Accomplishing these goals while also promoting the larger pedagogical goals of involving law students in access to justice work and developing their professional identity is a unique and powerful opportunity.

A. *Investigating Genre Discovery as a Foundational Skill*

Genre is a multidisciplinary concept with particular relevance to academic writing and legal discourse. In academic writing, the term "genre" typically refers to a "social genre," which is a type of written text, such as poetic or literary works, or professional or academic texts.[38] Forms of legal writing—such as memoranda, briefs, and legal opinions—can be best understood as social genres. Each social genre bears unique features because of its communicative circumstances, with one genre bearing different features from another.[39]

In legal discourse, the simplest understanding of genre is as a document type.[40] At its most basic level, legal writing instruction teaches students to identify and draft various document types.[41] Law school legal writing courses or textbooks often include examples such as predictive memoranda, appellate briefs, motion memos, demand letters, or contracts to demonstrate these genres of legal writing.[42] Teaching law students these genres expressly teaches competence within these given genres and implicitly teaches

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[38] *See* IAN BRUCE, ACADEMIC WRITING AND GENRE: A SYSTEMATIC ANALYSIS 6, 8 (2008) (taking the perspective of an academic considering the needs of a non-native speaking students who are mastering academic writing in English). "Genre" can also be used to refer to "cognitive genres," which are, essentially, ways to label rhetorical functions such as reporting information or exposition. *See id.* at 8, 89.

[39] *See id.* at 4–5; Katie Rose Guest Pryal, *The Genre Discovery Approach: Preparing Law Students to Write Any Legal Document*, 59 WAYNE L. REV. 351, 354 (2013); M.M. BAKHTIN, *The Problem of Speech Genres*, *in* SPEECH GENRES AND OTHER LATE ESSAYS 79 (Caryl Emerson & Michael Holquist eds., Vern McGee trans., Univ. of Tex. Press 1986).

[40] *See* Alexa Z. Chew & Craig T. Smith, *Border-Crossing: Genre Discovery and the Portability of Legal Writing Instruction*, 25 PERSPECTIVES: TEACHING LEGAL RSCH. & WRITING 8, 8 (2016).

[41] *See* Pryal, *supra* note 39, at 355.

[42] *See id.* at 369; NADIA E. NEDZEL, LEGAL REASONING, RESEARCH, AND WRITING FOR INTERNATIONAL GRADUATE STUDENTS, ix (5th ed. 2021). Other texts aimed at law students or practitioners may cover e-mails, letters, pleadings, draft rules and regulations, or other genres. *See* BRYAN A. GARNER, THE REDBOOK: A MANUAL ON LEGAL STYLE, 369–539 (3d ed. 2013).

transference—the ability to independently discern from prior experiences how to identify and communicate conventions in new, unfamiliar genres. At least, that is the hope.

But there is a flaw in simply teaching legal genres. As Katie Rose Guest Pryal has pointed out, students cannot review, let alone operationalize, all genres before entering practice.[43] It simply is not practical to anticipate every possible genre a student may write in practice, and even if it were possible to teach them, doing so may not even be useful. First, there is a reductivity problem. Simply drafting form document types as a law student, then uncritically adopting form documents as a lawyer, transforms legal writing into a reductive process that does not consider a client's particular needs.[44] It removes the analytical portion of a lawyer's work and falls short of fulfilling ethical obligations to a client, sometimes with professional consequences.[45] Second, and relatedly, teaching genres alone glosses over the fact that each document type is complex, circumstantial, and may involve multiple cognitive genres—or multiple rhetorical functions. Finally, genres evolve; a genre's conventions can change over time.[46] Teaching students to adhere to past or current form document types instills the misguided sense that law and legal work is static and hampers transference, keeping students' skills stagnant. It also fails to account for future evolution in the legal field.

Because a genre-discovery approach addresses the above problems, many skills professors expressly adopt it in their courses, learning objectives, and textbooks. In a genre-discovery approach, students learn to identify an audience and the rhetorical circumstances surrounding a communication, including the exigence, or need for the communication.[47] Then students locate examples of a legal genre, examine them, analyze and prioritize its conventions, determine which conventions are applicable to a new audience and set of rhetorical circumstances, then ultimately fulfill the conventions as modified by the writer's anticipation of the audience and rhetorical circumstances.[48] This teaches students to craft communication that addresses new needs thoughtfully and effectively. Students can also be taught to identify and intentionally

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[43] *See* Pryal, *supra* note 39, at 351.

[44] *See* Pryal, *supra* note 39, at 373.

[45] *See* Judith D. Fischer, *The Role of Ethics in Legal Writing: The Forensic Embroiderer, the Minimalist Wizard, and Other Stories*, 9 SCRIBES J. LEGAL WRITING 77, 101–05 (2004) (discussing the use of forms as part of a discussion of plagiarism in law practice).

[46] *See* Pryal, *supra* note 39, at 362; Chew & Smith, *supra* note 40.

[47] *See* Pryal, *supra* note 39, at 360.

[48] *See id.* at 355, 378–80.

engage in the metacognitive processes involved in determining a set of genre conventions.[49] These metacognitive processes include reflecting on what they have done, evaluating it, and applying what they have learned to a new exigence.[50]

Teaching Wikipedia as a genre in legal research, analysis, and writing courses takes the genre-discovery approach to the next level. By using a genre that students are already familiar with outside of law and instilling in them the knowledge that law and client needs are constantly evolving, updating Wikipedia will further elevate legal instruction and address the reductivity, complexity, and evolution problems noted above. It will also allow students to gain facility in a legal resource in use, with a legal audience that crosses borders and cultures.[51]

B. Integrating Legal Writing Skills

Pairing the genre discovery approach with actual Wikipedia editing engages students in deep, practical consideration of audience and rhetorical circumstance in ways that strengthen their legal research and writing skills. It forces students to grapple with where Wikipedia fits into established hierarchies of authority (and why). Moreover, when set in the universe of Wikipedia editing, the genre-discovery approach assumes the validity of a Wikipedia article as a genre of legal communication and challenges law students, in mastering the genre, to consider a wide-ranging audience, from a judge to a judicial clerk, to a parent in the park.[52] It can also challenge students to grapple with the fact that there is a multiplicity of effective approaches within one legal genre.[53] For example, a

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[49] *See generally* Katie Rose Guest Pryal, *Genre Discovery 2.0*, BARRY L. REV. (forthcoming 2023), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4337605.

[50] *See id.* (manuscript at 47-48).

[51] *See id.* (manuscript at 25–27).The authors detail an experiment in which they coordinated the creation of Wikipedia entries on Irish Supreme Court cases, then tracked: 1) whether cases cited in the Wikipedia entries would be cited in subsequent judicial decisions; and 2) whether the content of the decisions would reflect the content of the Wikipedia entries. The answer to both questions was yes, with the qualification that there was an impact on positive citations (i.e., analogies) but not negative citations (i.e., distinction).

[52] Challenging students to consider audience in this way may even take a step towards satisfying the new Standard 303(c) of the A.B.A. Standards and Rules of Proceudre for Approval of Law Schools. *See* A.B.A. STANDARDS & RULES OF PROC. FOR APPROVAL OF L. SCHOOLS Standard 303(c) (AM. BAR ASS'N 2022-2023).

[53] *See* BRUCE, *supra* note 38, at 91.

"memo" may mean a document with a Question Presented, Brief Answer, Discussion, and Conclusion. Or, for a different supervisor (audience) and context (rhetorical circumstance), it may mean a document with only some of those parts. In the traditional legal research, analysis, and writing classroom, students are simply told this by professors. In the Wikipedia context, the overarching genre of an article contains many sub-genres, from articles describing television shows to articles on law. In examining the commons that is Wikipedia, readers can see, in real time, conventions of a sub-genre, the evolution of each sub-genre's conventions, the interplay of different sources of authority, and the plurality of methods that satisfy the conventions.

Editing Wikipedia empowers law students, who are graduate-level students with advanced mastery of language and years of writing experience, to deeply consider audience and rhetorical circumstance, thus challenging them to focus on communicative purposes as to whole texts and writing processes rather than micro-issues such as vocabulary.[54] That includes honing the legal research skills necessary to identify influential opinions, articles, and other sources to support their articles.

Writing from a genre-discovery approach also allows for an examination of the rhetorical functions, or cognitive genres, contained in a piece of communication, and thus tests students' understanding of the complexity of a piece of communication. For example, the "revenge porn" Wikipedia article reflects multiple functions: recount, report, and review. One function is to recount the background of revenge porn by providing sequential information.[55] Another is to report on litigation and legislation related to nonconsensual intimate imagery by providing non-sequential information.[56] And yet another is to review legal recourse for nonconsensual intimate imagery victims by organizing information in relation to outcomes or choices.[57] Teaching law students to examine what every part of a piece of communication accomplishes teaches them to think critically about their own goals in crafting pieces of communication and assure transference of skills to

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[54] *See id.* at 6.

[55] *See* Levendowski, *supra* note 5; BRUCE, *supra* note 38, at 119.

[56] *See* Levendowski, *supra* note 5; BRUCE, *supra* note 38, at 119.

[57] *See* Levendowski, *supra* note 5; BRUCE, *supra* note 38, at 119.

students, who in the future, will face changing communicative circumstances.[58]

Integrating genre discovery with legal writing through editing Wikipedia can provide concrete context to law students about what should be accomplished when they engage in legal writing. It teaches law students to consider norms of communication and audience needs in sub-fields of legal discourse. Genre discovery also creates a basis for transferring legal writing skills from one rhetorical situation to another, as recognized by current legal writing scholars.[59] Wikipedia is an unconventional but powerful setting for law students to operationalize genre discovery in their legal writing because it immerses them in a constantly changing genre that, perhaps more than any other text, prepares students for the constantly changing practice of law.

C. *Instilling Ethical Service Obligations*

Editing Wikipedia helps people research more ethically in the colloquial sense, but it also aligns with lawyers' formal ethical obligations. Improving legal knowledge on Wikipedia helps *other* students and other researchers sidestep ethical issues raised by using Westlaw and Lexis. It also proactively promotes ethical practice: nestled in the ABA Model Rules is a radical, and often overlooked, obligation to actively encourage free access to legal information.

One portion of the Model Rules notes that "[a]s a member of a learned profession, a lawyer should cultivate knowledge of the law beyond its use for clients."[60] Editing Wikipedia can reach millions of people globally, providing a powerful way to share knowledge of the law more broadly than in a brief, contract or piece of legislation.

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[58] *See* Chew & Smith, *supra* note 40 at 8, 10–11 (explaining how in their use of the genre-discovery approach, students are provided samples of a genre, then asked to analyze what they see in the samples, note observations in the form of "document maps," and synthesize the genre's conventions, thus teaching students a process for anticipating what is needed for a given writing task, even for a genre a student has not seen previously).

[59] *See generally id.*; Pryal, *supra* note 39.

[60] MODEL RULES OF PRO. CONDUCT PREAMBLE & SCOPE (AM. BAR ASS'N 2022). Most jurisdictions have adopted some version of the Preamble, in which these obligations appear. *See* Am. Bar Ass'n, *Preamble: A Lawyer's Responsibilities*, Variations of the ABA Model Rules of Professional Conduct (Oct. 21, 2010), https://www.americanbar.org/content/dam/aba/administrative/professional_responsibility/pic_migrated/preamble.pdf.

Another portion calls on lawyers to "seek improvement . . . of access to the legal system."[61]

That improvement ought to include improving access to legal research, the infrastructure supporting the legal system. Editing Wikipedia articles to be accurate and accessible enables it to become, as Sarah Lamdan suggested, an "ethical alternative" default starting point for legal research. A final portion asks lawyers to "further the public's understanding of and confidence in the rule of law."[62] Editing a freely, publicly available resource to clarify what the law is and how it operates is likely to be more impactful than litigation or published legal scholarship.[63] Taken together, improving access to legal knowledge while improving application of one's legal skills is a powerful way to satisfy lawyers' ethical obligations.

III.   INTRODUCING WIKIPEDIA INTO THE LAW SCHOOL CURRICULUM

The prior sections of this Essay make the case that Wikipedia helps lawyers and law schools respond to some of the significant challenges posed by the legal academy's singular reliance on Westlaw and Lexis while also benefiting law students and law professors. This Section explains how to do it.

To be clear, we know that proposing additions to the well-established, heavily regimented law school curriculum is easy but that implementing those changes is hard. We also know first-hand that professors teaching skills-based courses are routinely asked to cover more "topics" or "skills" without a commensurate increase in class time or credit allocations.[64] That said, it is possible, practical, and powerful. We know because we have done it. This Section outlines concrete ways to incorporate Wikipedia editing at different

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[61] MODEL RULES OF PRO. CONDUCT: PREAMBLE & SCOPE 6 (AM. BAR ASS'N 2021).

[62] *Id.*

[63] As of 2012, the most cited law review article of all time is R.H. Coase, *The Problem of Social Cost*, 3 J.L. & ECON. 1 (1960), with 5,157 citations which, while not a precisely 1:1 comparison, is a far cry from *Deaths in 2021*, the most viewed Wikipedia article of 2021 alone, which boasted 44,937,556 views. *See* Ed Erhart, *Elizabeth and Elon: Wikipedia's Most Popular Articles of 2021*, MEDIUM (Dec. 21, 2021), https://medium.com/freely-sharing-the-sum-of-all-knowledge/elizabeth-and-elon-wikipedia-most-popular-articles-of-2021-104bacda2f99.

[64] *See, e.g.*, David I.C. Thomson, *What We Do: The Life and Work of the Legal Writing Professor*, 50 J. L. & EDUC. 170, 172-73 (2021).

touchpoints during the law school experience. Some of these suggestions are just ideas. Others are classroom-tested exercises and lessons that successfully integrated Wikipedia into our courses. This Section begins by identifying how teaching Wikipedia can be seamlessly introduced in the first-year legal research and writing course. It then illustrates the many different ways that Wikipedia can be integrated into both doctrinal and skills-based courses in the second and third year.

A. First-Year Legal Research & Writing

The logical place to introduce Wikipedia as a genre of legal communication is in first-year legal research and writing courses. Wikipedia is both a source of authority and a genre of legal communication—two foundational concepts taught in most first-year legal research and writing courses. Beyond that, these courses typically introduce Westlaw and Lexis as the primary tools of legal research because of their outsized role in the legal system and the reality that these companies provide their services to law students at no cost.[65] More than that, Wikipedia is often covered, at least in passing, in discussions about hierarchy of authority and the difference between primary and secondary sources of authority. Students are also typically familiar with Wikipedia before they step foot in law school classrooms. Using Wikipedia as a teaching tool in these courses therefore can be effective even in an overstretched curriculum.

For example, in one of our first-year legal writing classroom this past fall, students—as a class—were asked to spend one class meeting expanding a Wikipedia article on trade secrets to include a fifty-state survey including statutes and cases. The students were already familiar with trade secret law from an earlier memo assignment. Specifically, in that class, the professor asked his students to use the research and writing experience they gained earlier in the semester to source and start the survey to add to the Wikipedia article on trade secrets that previously only referenced nationwide trends.[66] This task would have taken a single individual

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[65] *See* Olufunmilayo B. Arewa, *Open Access in a Closed Universe: Lexis, Westlaw, and the Legal Information Market*, 10 LEWIS & CLARK L. REV. 797, 832 (2006) (discussing the "extremely generous" approach of Westlaw and Lexis in the law school market).

[66] *Wikipedia, Draft: List of United States Trade Secret Laws*, *Wikipedia: Trade Secrets*, WIKIPEDIA, https://en.wikipedia.org/wiki/Draft:List_of_United_States_state_trade_sec

many hours to create, but a class of 57 students was able to complete this research in less than 30 minutes. This exercise operated as a kind of collaborative capstone project for the course. It served as the basis for a discussion reviewing techniques for dealing with new genres students might be asked to communicate through in the future, as well as a chance to apply research and writing skills covered in the course. It also showed students that they could (and should) contribute to the body of legal knowledge given their own knowledge and experience doing legal research. Students found this experience enlightening. As one student in this class put it well, "the assignment showed me how I can directly apply the skills I'm learning in legal writing to produce some positive benefit for others and at that point of the semester it was really nice to be reminded of that," and she learned that "we can all play a role in making information more accessible. A somewhat obvious point but not something I think about much in the midst of everything that happens in 1L."

There are any number of other ways that professors of these courses could supplement or reframe existing exercises to integrate Wikipedia editing. Early in the semester, Wikipedia can be used as an example that helps introduce the concept of genre discovery. Unlike opinions and memoranda, the vast majority of law students come to law school as regular consumers of Wikipedia who are familiar with the conventions of the genre. More than that, students may also come with experience as writers in the genre either in their undergraduate education, where Wikipedia editing is increasingly taught,[67] or based on personal experience.

Wikipedia can also be used to help teach authority as the foundational building block of legal research and writing.[68] Including Wikipedia in the discussion about hierarchy of authority, primary and secondary authority, and binding and persuasive

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ret_laws (last visited May 25, 2023). The other benefit of this kind of in-class Wikipedia exercise is that it shows students that they can be a part of the larger, on-going process of crowd-sourced legal knowledge creation without needing to complete it themselves. In fact, as of the date of the publication of this Essay, the Wikipedia article the students started in the classroom exercise described above has been identified by Wikipedia editors as requiring more external links prior to final publication. This is a task that future students or interested lawyers can take up. Allowing students to see this illustrates the power of incremental progress in the Wikipedia editing process.

[67] One of us got her start editing Wikipedia through a college class, which was supported by WikiEdu.

[68] *See* Amy J. Griffin, *Dethroning the Hierarchy of Authority*, 97 OR. L. REV. 51, 52 (2018).

authority puts into perspective how to use (and importantly how *not* to use) Wikipedia and other crowdsourced information as a legal writer. Discussing Wikipedia also allows a discussion of the benefits and challenges of tools like Westlaw and Lexis which are otherwise seen as freely accessible sources to law students even though that is not true outside of the law school context. Finding ways for students to create as opposed to merely consume Wikipedia articles has the potential to make the discussion of authority more concrete. Finally, after discussing citation and rewriting for conciseness, students could be asked to more fully source or edit a legal Wikipedia article that is already written.

We are of course not proposing that legal research and writing professors should do *all* of these things. Rather this is a proof of concept that pedagogical innovation is possible, and teaching Wikipedia editing provides a path to better achieve course objectives, better introduce access to justice concepts, and better promote professional identity and ethical goals without watering down traditional legal research and writing curricula.

B. *Second- and Third-Year Courses*

Opportunities to integrate Wikipedia as both a societal benefit and pedagogical tool only increase in higher-level courses. In one of our courses, second- and third-year clinic students are given a topic related to their interest in intellectual property or information policy and asked to improve it during one two-hour class session. Students gain comfort with the mechanics of editing by creating their online biographies and leaving messages for their professor.[69] When they're ready, students proceed to refine grammar and sentence structure (called "wikiGnome" edits),[70] add authority, format and integrate open-source citations, and revise the article substantively to clearly, concisely capture the core elements of the legal topic.[71] It's an effective exercise. Students report that learning how to edit Wikipedia is "one of the most useful skills I have learned in law school. Not only does it provide great practice writing articles for non-legal audiences, but it also allows us to share our legal

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[69]   *User Talk: Levendowski*, WIKIPEDIA, https://en.wikipedia.org/wiki/User_talk:Levendowski (last visited Jan. 13, 2023).
[70]   *Wikipedia: WikiGnome*, WIKIPEDIA (MAY 9, 2023), https://en.wikipedia.org/wiki/Wikipedia:WikiGnome (last accessed Jan. 13, 2023).
[71] Since 2019, more than 25 students in the Intellectual Property and Information Policy (iPIP) Clinic have edited Wikipedia.

knowledge with the world for free, which has implications for access to justice. I wish I had learned this sooner."[72]

More advanced coursework may create space for students to write entire articles about new legal issues, impactful as a means of applying students' doctrinal and historical knowledge to contemporary legal developments. Students may create, improve, or expand Wikipedia articles to apply their own knowledge and contribute to the collective knowledge of lawyers, law students, and the general public alike. One easy, effective way to operationalize this option is encouraging students to integrate research underpinning their academic seminar papers into more colloquial yet equally well-researched articles that expand the scope *and* audience of their legal research, as well as amplify its potential impact—not unlike the revenge porn article, which was drafted parallel to an advanced copyright course. With intentional pedagogical investment, editing Wikipedia becomes a superpower that transcends the classroom door. Students may choose to contribute to the knowledge commons on their own time as part of the professional identity exploration that is crucial to legal education.[73] (The clinic student quoted above did: he created the article about the second woman admitted to the Pennsylvania bar and two more women attorneys.)[74]

Once outfitted with the how and the why, law students are more likely to participate in this important process of knowledge transformation on their own time—and as part of the professional identity exploration that is so crucial to legal education. Engaging in this editorial practice in law school encourages lawyers to continue contributing to free, public legal knowledge in effective and efficient ways.

CONCLUSION

Wikipedia has the power to transform how lawyers, law students, and the public engage with legal information. For lawyers seeking to engage in more ethical research practices, Wikipedia is unlikely to supplant Westlaw and Lexis in the near term. While

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[72] Email from iPIP Clinic Student to Amanda Levendowski, Assoc. Professor of L. (Mar. 23, 2021 (on file with author).

[73] Amanda Levendowski & Laura Ahmed, *Teaching with Wikipedia*, IPSE DIXIT, at 17:53-18:35 (Apr. 9, 2020), https://www.youtube.com/watch?v=oD7sQkBFTus.

[74] *User: Halevin*, WIKIPEDIA, https://en.wikipedia.org/wiki/User:Halevin (last visited Jan. 13, 2023).

critical legal research scholars have critiqued overreliance on algorithms underlying both subscription services, legal researchers depend on their fast, easy, effective results.[75] Proprietary case-finding tools, like Headnotes and Key Numbers, make it simple to skim cases and identify other relevant ones quickly. Researchers may believe that Wikipedia could never touch these tools. However, Wikipedia has two systems that could function similarly: Categories and WikiProjects. Categories are identified at the bottoms of articles, which can connect researchers with other relevant topics.[76] The categories for the "revenge porn" article are pornography, Internet culture, sex and the law, and human rights abuses, which guide readers to indexes of other articles tagged with those categories.[77] Further, articles' Talk pages often include WikiProjects, which unite editors working on certain topics and connect readers to related articles and other WikiProjects.[78] WikiProjects affiliated with "revenge porn" are Feminism, Pornography, Gender Studies, Law, and Crime.[79] These systems are currently blunter than those of Westlaw and Lexis, but editors can propose new ones. Over time, law student editors could coordinate on best practices for Categories and WikiProjects to increase their usability as means to find the law, not just stumble across it.

In the digital town square, the public is constantly engaged by reporting that relies on sophisticated legal communication like memoranda, motions, briefs, contracts, legislation, testimony, and judicial opinions. Due to the expensive, exclusionary nature of data cartels, however, the public often cannot access the underlying documents, let alone contextualize the legal information within

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[75] F. Allan Hanson, *From Key Numbers to Keywords: How Automation Has Transformed the Law*, 94 L. LIBR. J. 563, 599–600(2002) (critiquing impact of consolidated, algorithmicized legal research); Katrina Fischer Kuh, *Electronically Manufactured Law*, 22 HARV. J.L. & TECH. 223, 228–29 (2008) (critiquing outsized, disturbing influence of Westlaw and Lexis); Nicholas F. Stump, *Following New Lights: Critical Legal Research Strategies as a Spark for Law Reform in Appalachia*, 23 AM. U. J. GENDER SOC. POL'Y & L. 573, 603–04 (2014) (critiquing uniformity of thought cultivated through algorithmicized research).

[76] *Help: Category*, WIKIPEDIA, https://en.wikipedia.org/wiki/Help:Category (last visited May 23, 2023).

[77] *Revenge Porn,* WIKIPEDIA (Feb. 21, 2023), https://en.wikipedia.org/w/index.php?title=Revenge_porn&oldid=599174738.

[78] *Wikipedia: WikiProject*, WIKIPEDIA https://en.wikipedia.org/wiki/Wikipedia:WikiProject (last visited May 23, 2023). Talk pages are accessed by clicking "Talk" next to the word "Article" in the upper left of an article's page.

[79] *Revenge Porn: Talk,* WIKIPEDIA https://en.wikipedia.org/wiki/Talk:Revenge_porn (last visited May 23, 2023).

them. [80] While free, public resources and websites do provide legal information, the public rarely knows how to navigate websites like SCOTUSBlog, Justia or Congressional websites—they may not even know such websites exist.[81] But the public does know how to fall down rabbit holes on Wikipedia.[82] With the help of law students, Wikipedia can meet the public where they're at and become a powerful conduit for improving access to legal information. By learning how to edit Wikipedia, students apply their legal practice skills to serve the public, who are the intended beneficiaries of the law.

As we've seen in our classrooms, Wikipedia works. Students engage in genre discovery, including creating and strengthening legal texts for lay audiences. They explore legal research and writing, putting hard-earned skills into practice. And they embrace promoting access to knowledge, bringing them into further alignment with their legal ethics obligations. Most of our students report that they wish to continue editing beyond the course—they simply wished they'd learned how to edit Wikipedia sooner. Our hope is that you will join us in teaching them how.[83]

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[80] Amanda is working on the Legal Information Pledge (LIP), which would pledge journalists to providing free, public version of all underlying legal documents used in reporting stories.

[81] PACER users can create free, public copies of downloaded documents using the Free Law Project's RECAP tool. RECAP is PACER backwards. *See Advanced RECAP Search*, RECAP, https://www.courtlistener.com/recap/ (last visited May 23, 2023); *RECAP Project: Turning PACER Around*, FREE LAW PROJECT, https://free.law/recap (last visited May 23, 2023). For a deeper dive into just citation methods that rely on free, public legal research resources, see Amanda Levendowski, *Just Citation*, 39 BERKELEY J. GENDER, L. & JUST. (forthcoming 2024).

[82] Cecily Mauran, *10 Wikipedia Rabbit Holes to Fall Down Instead of Doom Scrolling*, MASHABLE (Feb. 5, 2022), https://mashable.com/article/best-wikipedia-rabbit-holes; *See* Burn 'Em Up Kids, RABBIT HOLE: A WIKIPEDIA PODCAST (Oct. 1 2017), https://www.podchaser.com/podcasts/rabbit-hole-a-wikipedia-podcas-63863.

[83] The Wikimedia Foundation provides an entire project dedicating to helping professors introduce Wikipedia into their classrooms. *See Wiki Education Dashboard*, WIKIPEDIA (Jan. 13, 2023), https://dashboard.wikiedu.org/. We are also always available by email to discuss editing.