International Journal for Multidisciplinary Research (IJFMR)
E-ISSN: 2582-2160 ● Website: www.ijfmr.com ● Email: editor@ijfmr.com

Artificial Intelligence and E-Resources in Modern Legal Research

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Abstract
Modern legal research now combines searchable electronic databases with tools that interpret natural-language questions and generate summaries or analytical answers. This paper examines that combination through SCC Online, Manupatra and Westlaw, with an Indian-law focus. It distinguishes curated e-resources and citation tools from generative artificial intelligence, compares the functions publicly described by each provider, and considers the limits of relying on automated outputs. The analysis uses provider documentation, official judicial and statutory material, and empirical research on legal AI. It does not claim to test the current products against one another. The central finding is that AI can improve discovery and assist synthesis, but it cannot establish the authority, current status or application of a legal proposition by itself. Indian Supreme Court decisions in 2026 make verification a concrete professional obligation: lawyers and adjudicators must check authorities rather than rely on plausible, machine-generated citations. The paper proposes a human-led workflow that uses databases and AI for discovery while grounding every final proposition in verified primary sources.[1]

Keywords artificial intelligence; legal research; e-resources; SCC Online; Manupatra; Westlaw; hallucinations; verification

1 Introduction

Legal research is the disciplined identification and interpretation of legal sources relevant to a defined issue. A researcher must find the source, establish whether it is binding or persuasive, determine whether it remains good law, understand its procedural and factual setting, and explain how it applies. Electronic legal resources have made the first stages faster by placing cases, statutes, regulations, commentary and citation links within searchable platforms. Artificial intelligence adds new ways to formulate searches and to summarise or synthesise material. These advances change the research process, but they do not change what counts as law.

The Supreme Court of India has itself described the Indian judiciary's use of digital and AI-supported systems, including research assistance, translation and transcription, while emphasising accuracy, human oversight, confidentiality and privacy. This paper applies that broader context to the researcher's day-to-day use of SCC Online, Manupatra and Westlaw. Its argument is that the platforms are best understood

[1] Supreme Court of India, Centre for Research and Planning, White Paper on Artificial Intelligence and Judiciary (Nov. 2025), especially chs. 3–5, pp. 46–69. The White Paper surveys Indian judicial AI initiatives and identifies accuracy, confidentiality, privacy and human oversight as issues for governance.

as research environments: they can help locate and organise authorities, and some now generate analysis, but the researcher must remain responsible for the source, the proposition and the final legal judgment.[2]

2. Scope and research method

The paper uses a doctrinal and descriptive method. It examines current public product materials for the named services, official Supreme Court material, statutory text and published empirical research. The descriptions of features are attributed to their providers; they are not independent findings about comparative accuracy, coverage or speed. No live subscription-based product testing was conducted. This qualification matters because product names can cover different jurisdictions, subscription tiers and feature releases, and those details can change.

The term "e-resource" is used here for a digital legal collection or research platform that makes legal materials searchable, retrievable or linkable. "Artificial intelligence" is used broadly for computational systems that perform language, classification, ranking or generation tasks. Within this broad category, a researcher should distinguish search and classification from generative AI. A database may rank documents or identify citing cases without generating a new legal answer. A generative system may produce a narrative answer, often by retrieving documents and then drafting a synthesis. Retrieval-augmented generation can connect an answer to a document set, but retrieval and generation are separate stages, and errors can arise at either stage.[3]

3. The principal e resources

3.1 SCC Online

SCC Online is a major Indian legal research service organised around reported decisions and other legal materials. Its SmartSearch feature illustrates AI-supported discovery rather than an answer-writing system: the provider describes it as a natural-language, semantic search that ranks relevant judgments, statutes and commentary from the SCC Online database. A researcher can therefore begin with a plain-language issue and use the results to identify documents for closer reading. This can reduce repeated keyword reformulation, especially where the researcher does not yet know the precise legal terminology.[4]

SCC Online has also publicly presented AI Pro as a tool that can analyse a factual question, structure legal issues and provide an answer linked to cases and statutory provisions in its collection. The provider's own descriptions characterise the system as an aid to, rather than a substitute for, professional legal reasoning. That source linkage is useful because it makes checking possible; it does not establish that every relevant authority was retrieved, that a cited case supports the proposition attributed to it, or that the answer reflects the latest legal position. Availability and exact functionality should be confirmed against the user's subscription and the current product documentation.[5]

[2] Supreme Court of India, "White Paper on Artificial Intelligence and Judiciary" (Nov. 2025), chs. 4–5; see also Supreme Court of India, e-SCR, "About Us," describing the digital Supreme Court Reports as the official publication's digital version.

[3] Varun Magesh, Faiz Surani, Matthew Dahl, Mirac Suzgun, Christopher D. Manning & Daniel E. Ho, "Hallucination-Free? Assessing the Reliability of Leading AI Legal Research Tools" (2025) 22(2) Journal of Empirical Legal Studies 216, 216–242, doi:10.1111/jels.12413 (explaining retrieval-augmented generation and separating retrieval from generation).

[4] SCC Online, "SmartSearch on SCC Online: Redefining Legal Research with Natural Language Search," SCC Times (4 Feb. 2026), https://www.scconline.com/blog/post/2026/02/04/scc-online-smartsearch-natural-language-search/ (provider description; accessed 4 Nov. 2026).

[5] SCC Online, "Stop Trusting Random AI for Legal Research | Introducing SCC Online AI Pro" (30 July 2026), https://www.scconline.com/blog/post/2026/07/30/scc-online-ai-pro-smartest-way-to-legal-solutions/; see also SCC Online, "AI Pro" announcement (26 Jan. 2026). These are provider descriptions, not independent accuracy assessments (accessed 4 Nov. 2026).

3.2 Manupatra

Manupatra's public descriptions emphasise structured legal search. Manu Search supports keyword, phrase and Boolean queries; Legal Search permits fielded searching; Citation Search and Act Search help locate cases and statutory provisions. The platform also describes filters by court, judge, subject and date, case notes, result sorting and an Authority Check timeline showing later-citing decisions within its database. These features are valuable for controlled searching and citation tracing. A user must still open the decisions and assess the legal effect of later treatment. The number of citations shown is a lead for research, not a measure of binding force, correctness or continuing validity.[6]

3.3 Westlaw

Westlaw offers jurisdiction-specific collections and research tools. Thomson Reuters' materials for Westlaw Precision and CoCounsel describe AI-Assisted Research that accepts a legal question, searches the selected Westlaw content, returns an answer with linked citations and exposes supporting materials for review. Precision Research also enables case discovery by legal issue, fact pattern, material facts, cause of action and motion outcome. The tools can help a researcher move from an issue description to candidate authorities and then inspect the source documents.[7]

Westlaw is not a single uniform database. The cited help materials describe particular North American product configurations, including limits on jurisdiction selection and functions that may not be supported. A researcher working on Indian law must verify which jurisdiction and collection the subscribed product actually covers. The name "Westlaw" alone is not proof that an Indian legal question has been searched against Indian primary sources. Feature availability, coverage and terms must be checked for the specific account and product.[8]

Platform comparison and verification checks

- **SCC Online:** Indian law collection, natural-language SmartSearch and AI Pro answer synthesis as described by the provider. Separate search results from generated analysis; read the source and confirm currentness.
- **Manupatra:** Keyword, Boolean, fielded, citation and Act search; filters and later-citation tools. Treat citation counts and database treatment as research leads, not a substitute for legal analysis.
- **Westlaw:** Jurisdiction-specific case and legislation research; Precision Research and CoCounsel assistance in supported products. Check the selected jurisdiction, content collection, subscription and linked authority.

4 The contribution of AI to legal research

AI can make early-stage research more flexible. Natural-language search helps translate a researcher's description of a dispute into candidate documents. Semantic ranking may retrieve decisions that do not repeat the query's exact words. Document summarisation can help a researcher triage a large set of judgments, and an AI assistant can propose legal issues, counterarguments or follow-up questions. In

[6] Manupatra, "Key Features" (Manu Search, Legal Search, Citation Search, Act Search and Authority Check), https://www.manupatra.com/ipAccess.aspx; "Interactive Timeline / Authority Check," https://www.manupatra.com/iTimeLine/Whatsthis.aspx (provider help materials; accessed 4 Nov. 2026).

[7] Thomson Reuters, "Skill: AI-Assisted Research," CoCounsel Help, https://www.thomsonreuters.com/en-ca/help/cocounsel/legal/skills/understanding-cocounsel-skills/ai-assisted-research (describing linked citations and supporting content in the documented product; accessed 4 Nov. 2026).

[8] Thomson Reuters, "Understanding Precision Research," Westlaw Advantage Help, https://www.thomsonreuters.com/en-us/help/westlaw-advantage/searching/understanding-precision-research; "Generative AI," Westlaw Precision Help, https://www.thomsonreuters.com/en-us/help/westlaw-precision/tools/generative-ai (accessed 4 Nov. 2026).

multilingual work, machine translation and transcription can widen access to material that would otherwise require more time to process. These uses are most valuable when they shorten the route to authoritative documents and make the researcher's next question clearer.

The value of a platform still depends on its collection, editorial treatment, search design and update cycle. A result ranked first is not necessarily the most authoritative decision. A citator or timeline can show that a judgment has been cited, but the researcher must examine whether the later court followed, distinguished, questioned or overruled it. A model's synthesis may omit a procedural limitation, a conflicting line of authority or a subsequent statutory amendment. For that reason, e-resources and AI should support the same conventional tasks of source identification, treatment checking and legal analysis, rather than replace them.

5 Risks and limits

5.1 Hallucinated or misapplied authority

A generative system can produce an invented citation, attach a real citation to a proposition it does not support, misquote a judgment or rely on an authority from the wrong court or time period. A citation link does not eliminate these risks: the link may open a genuine decision while the generated summary misstates its holding. A preregistered 2025 empirical study of specific legal research products, using queries run in 2024, found that the tested Westlaw AI-Assisted Research responses contained hallucinations in about one third of cases. The study also found that retrieval-augmented legal tools performed better than a general-purpose model overall, while still producing substantial errors.[9]

Those figures should be used with care. The study tested particular products at a particular point in time on a research set focused on United States law. Its authors note that products change and that their results do not establish the accuracy of later versions, SCC Online AI Pro, Manupatra, or an Indian-law workflow. The study therefore supports a general conclusion about the need for verification, not a numerical ranking of the products discussed here. Even a correctly retrieved case can be inapplicable because the jurisdiction, procedural posture, statute or later treatment differs.[10]

5.2 Coverage, currency and bias

Electronic databases are bounded by the material they include and how they index it. Older, unreported, regional-language or lower-court decisions may be harder to locate; a platform's coverage statement does not ensure complete retrieval for every topic. Search algorithms may rank material differently, and a model may over-weight a headnote, digest or frequently cited decision. The researcher should search across relevant courts and years, test alternative formulations, check primary documents and look for contrary authority. Use of a second platform can help test the search, but it does not cure a shared omission or establish the legal status of a case.

5.3 Confidentiality and personal information

Uploading pleadings, client correspondence or evidence to an AI service raises a separate question from whether the answer is legally sound. Before use, a researcher should review the service's retention, training, access, security and deletion terms, along with applicable professional, contractual, court and data-protection requirements. Personal identifiers and confidential facts should be removed or minimised unless the tool and workflow have been approved for that use. The Digital Personal Data Protection Act,

[9] Magesh et al., "Hallucination-Free?" (2025) 22(2) Journal of Empirical Legal Studies 216, 235–236. The authors report hallucinations in about one third of tested Westlaw AI-Assisted Research responses; the tested queries were run in 2024 and evaluated specified products.

[10] Magesh et al., ibid., 237–239 (identifying product-version, point-in-time and evaluation limitations; the study is not a benchmark of current Indian platforms).

2023 permits phased commencement by notification; its application to a particular workflow should therefore be checked against the relevant commencement notifications and rules, rather than assumed from the Act's enactment alone.[11]

6. Indian judicial guidance

The Supreme Court's 2026 decision in Pooja Ramesh Singh v. Jammu and Kashmir Bank Ltd. is a direct warning about unverified AI-generated legal material. The NCLT had relied on six citations that were either non-existent or contained paragraphs that could not be found in the cited judgments; the NCLAT did not detect the problem. The Supreme Court set aside both orders, declared zero tolerance for citing or using AI-generated precedents without verification, and stated that reliance on fake or hallucinated material taints adjudication. It also directed the Bar Council of India to consider guiding principles and disciplinary consequences. The Court clarified that the decision did not prohibit the rightful use of AI; it addressed presenting or relying on fabricated material as precedent.[12]

In September 2026, Vijay Ghanshyam Gadiya v. Union of India applied the same concern to an administrative adjudication. The Supreme Court found that a customs order relied on non-existent or mis-cited cases and on propositions not supported by the genuine judgments. It set aside the order and the High Court judgment, while recognising that AI may assist decision-making if it does not substitute for adjudication. The case shows that verification is required even when AI-generated authorities appear in an official order rather than a lawyer's submission.[13]

The Supreme Court's AI Committee also published draft Regulations for Use of Artificial Intelligence in Courts, 2026, inviting comments. The draft lists legal research, precedent retrieval, citation verification and document summarisation among possible court uses, while proposing human review, disclosure and safeguards for sensitive judicial data. These are proposals, not rules that became binding merely upon publication. In September 2026, the Supreme Court in Gadiya expressly noted that the regulations had not yet been finalised. The draft is nevertheless a useful statement of the governance principles under discussion: AI may assist, but human beings remain responsible for the decision and for checking the material used.[14]

7. A responsible research workflow

A sound workflow begins by stating the issue, relevant dates, jurisdiction and type of authority required. Search more than one way: combine precise statutory language and citations with broader natural-language or semantic queries. Use each platform for the task it performs well. For example, use SCC SmartSearch for issue-led discovery, Manupatra's citation and fielded search when the citation, court or statute is known, and Westlaw only after confirming that the selected database covers the jurisdiction in question. Treat the generated answer as a provisional map of sources, not as a conclusion.

[11] Digital Personal Data Protection Act, 2023, No. 22 of 2023, ss. 1(2), 4 and 8. Section 1(2) permits different commencement dates for different provisions; check applicable commencement notifications and rules for a specific workflow.

[12] Pooja Ramesh Singh v. Jammu and Kashmir Bank Ltd. & Anr., 2026 INSC 668, Civil Appeal No. 11950 of 2025, ¶¶ 1, 7–9, 16–18 (Supreme Court of India, 2 July 2026), official judgment: https://api.sci.gov.in/supremecourt/2025/11950/11950_2025_1_1501_668_Judgement_02-Jul-2026.pdf.

[13] Vijay Ghanshyam Gadiya v. Union of India & Anr., 2026 INSC 947, Civil Appeal No. 12155 of 2026, ¶¶ 4–8 (Supreme Court of India, 2 Sept. 2026), official judgment: https://api.sci.gov.in/supremecourt/2026/21991/21991_2026_7_1501_73957_Judgement_02-Sep-2026.pdf.

[14] Supreme Court of India, AI Committee, Draft Regulations for Use of Artificial Intelligence in Courts, 2026 (3 June 2026), regs. 19–20, 43, 48; Supreme Court of India, notice inviting comments on the draft (3 June 2026). In Vijay Ghanshyam Gadiya, 2026 INSC 947, ¶ 6, the Court recorded that the draft regulations were yet to be finalised.

Next, open each case or statutory provision in the database and read the relevant passage in its full context. Confirm the case name, court, date, citation, paragraph number, material facts, ratio, subsequent treatment and any appeal or overruling. Where possible, compare the database text with the court's official record. The Supreme Court's e-SCR portal describes itself as the digital version of the official Supreme Court Reports; India Code provides the official central legislative text. These sources help verify the primary text, while commercial databases may assist with discovery, editorial notes and citation links.[15]

For AI-assisted synthesis, constrain the prompt to the verified documents and require pinpoint references for each proposition. Ask the system to identify contrary authorities, uncertainty and questions it could not resolve. Then check every citation and quotation independently, including whether the cited paragraph actually says what the draft claims. Keep a short research log recording the query, platform, date, source documents and any corrections made. Do not cite an AI answer as authority; cite the judgment, statute, rule or other source that supports the proposition.[16]

Finally, protect the research record. Use only an approved account for client material, minimise personal information, and retain the final human-reviewed source list and draft. Where a court, client or institutional policy requires disclosure of AI use, follow that requirement. A verification record improves reproducibility and lets another lawyer see how the conclusion was reached.

8. Conclusion

SCC Online, Manupatra and Westlaw show that modern legal research is becoming a combination of database retrieval, citation analysis and AI-supported interpretation. Their search and organisational features can expand access to relevant material and reduce routine time. Generative answers can help a researcher organise issues and navigate a body of sources, but they remain vulnerable to false citations, incomplete retrieval, jurisdictional error and misstatement of a holding. The Indian Supreme Court's 2026 decisions make clear that those risks carry legal and professional consequences when unverified material is used as authority. Modern legal research should therefore be AI-assisted and source-led: the researcher frames the issue, uses digital tools to find and organise materials, verifies the primary law, and owns the final analysis.

Selected authorities and materials

The following list identifies the principal legal, institutional, empirical and provider materials cited in the footnotes. Provider feature descriptions were checked on 4 November 2026 and should be rechecked before publication or professional reliance.[17]

- Pooja Ramesh Singh v. Jammu and Kashmir Bank Ltd. & Anr., 2026 INSC 668 (Supreme Court of India, 2 July 2026).
- Vijay Ghanshyam Gadiya v. Union of India & Anr., 2026 INSC 947 (Supreme Court of India, 2 September 2026).
- Supreme Court of India, Centre for Research and Planning, White Paper on Artificial Intelligence and Judiciary (November 2025).

[15] Supreme Court of India, e-SCR, "About Us," https://scr.sci.gov.in/scrsearch/; India Code, Digital Personal Data Protection Act, 2023, https://www.indiacode.nic.in/bitstream/123456789/22037/1/a2023-22.pdf (accessed 4 Nov. 2026).

[16] For professional filings, see also Pooja Ramesh Singh, 2026 INSC 668, ¶¶ 7–9. The Court stated that AI-generated precedent must not be produced, cited or used without verification, while clarifying that rightful use of AI was not prohibited.

[17] The public product descriptions cited above were reviewed on 4 November 2026. Feature names, jurisdictions, subscriptions and product availability may change; the paper does not independently test those services.

- Supreme Court of India, AI Committee, Draft Regulations for Use of Artificial Intelligence in Courts, 2026 (3 June 2026).
- Digital Personal Data Protection Act, 2023, No. 22 of 2023.
- Varun Magesh et al., "Hallucination-Free? Assessing the Reliability of Leading AI Legal Research Tools" (2025) 22(2) Journal of Empirical Legal Studies 216–242, doi:10.1111/jels.12413.
- SCC Online, "SmartSearch on SCC Online: Redefining Legal Research with Natural Language Search" (4 February 2026); "Introducing SCC Online AI Pro" (30 July 2026).
- Manupatra, "Key Features" and "Interactive Timeline / Authority Check" (provider help materials).
- Thomson Reuters, CoCounsel "AI-Assisted Research" help materials for Westlaw Precision; "Understanding Precision Research" help materials for Westlaw Advantage.
- Supreme Court Reports, e-SCR, "About Us" (Supreme Court of India); India Code, Digital Personal Data Protection Act, 2023.