jhana.ai Headnotes Arena

Expert Human Arena Benchmark for Judgment Headnotes

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At a Glance

For over fifty years, the Supreme Court Cases (SCC) reporter has been the gold standard for judicial headnotes in India — painstakingly crafted by senior legal editors, paywalled behind expensive subscriptions, and published months after judgment delivery.

In June 2025, we asked: *can an AI write headnotes that lawyers actually prefer?*

We ran a blinded arena — 33 NLS alumni and students, 12 Supreme Court judgments, three headnote sources stripped of all branding — and let the evaluators choose.

Elo Rating	vs. GPT-4o	vs. SCC
1173	**73%**	**58%**
#1 overall	win rate ($p < 0.001$)	win rate (human SOTA)

First Place	Likert Score	Criteria Led
45%	**3.70**	**3 / 4**
of blind rankings	out of 5.0 (highest)	Read., Enjoy., Comp.

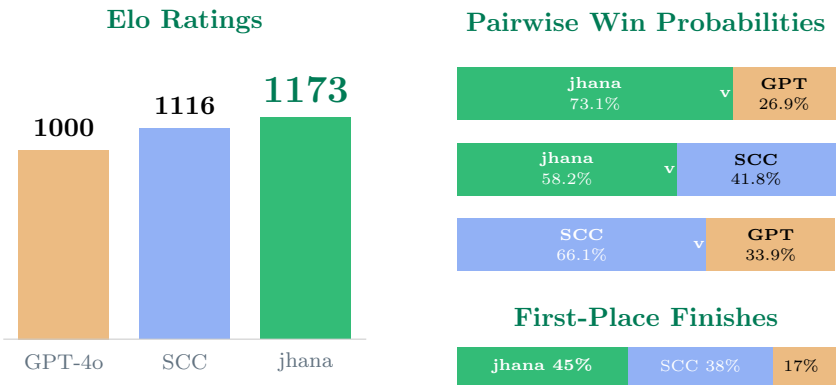

Figure 1: Summary results: Elo ratings, pairwise win probabilities, and first-place finishes

The story in plain language: When 33 legal experts evaluated headnotes without knowing which was human-written and which was AI-generated, they consistently preferred jhana's output. Not on one criterion or a few lucky cases — across readability, enjoyability, comprehensiveness, and across every judgment type in the corpus.

The strongest signal was on the dimensions that matter most for practical use. **Readability** (+0.47 points, $p = 0.002$) and **Enjoyability** (+0.68 points, $p < 0.001$) — whether a headnote is clear enough to parse under time pressure, structured enough to guide reasoning, and composed well enough that the reader trusts it — are where jhana's advantage over the human gold-standard is most decisive. These are medium-to-large effect sizes by any standard, and they are the criteria that determine whether a lawyer actually *uses* a headnote or skips it.

What makes this result particularly robust is its **consistency**. Two completely independent evaluation methods — cardinal scoring (rate each headnote 1–5) and ordinal voting (rank them) — produce the identical leaderboard: **jhana** > **SCC** > **GPT-4o**. The Bradley-Terry model fits the data with residuals under 2.5%. Five separate backchecks confirm the finding from different angles.

And these results are already outdated. The pipeline benchmarked here — KURAL — is the **predecessor** to SUIT v1, jhana's current document intelligence platform. SUIT introduces vision-model-based understanding, multi-format fidelity, and substantially improved extraction. What you see in this report is a **conservative lower bound** on what jhana can do today.

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Part I
The Benchmark

1 The Headnotes Generation Problem

Headnotes are concise summaries of judicial decisions that capture core issues, legal questions, and holdings. The jhana.ai Headnote Generator employs proprietary LLM pipelines to produce headnotes for Indian judicial decisions. In partnership with various High Courts, jhana is conducting field deployment with two objectives:

1. Enhance public access to legal summaries, circumventing traditional paywalls
2. Enable mass publication of headnotes at unprecedented scale, including for non-reportable cases

This task presents challenges in long-context comprehension (judgments spanning hundreds of pages), semantic logic and esoteric stylization (preserving legal logic in a highly stylized format), and high-stakes deployment (public-facing AI judiciary application with direct citizen benefits).

2 Comparison Systems

Headnotes from three sources were presented in **blinded, randomized order** (labeled only as "Headnote A/B/C"):

1. **SCC** (Supreme Court Cases reporter) — **human SOTA**: the gold-standard for Indian legal headnotes for over 50 years, authored by senior legal editors. SCC headnotes were *re-typeset in a generic format*, preserving the aesthetic quality and formatting of the originals while stripping all brand identifiers to ensure blinding.
2. **GPT-4o** (OpenAI) — **LLM SOTA at time of study**: the leading frontier model at time of benchmarking, used as the AI control. The raw PDF judgment was input to GPT-4o with standard prompting for headnote generation.
3. **jhana.ai KURAL** — proprietary PDF-to-PDF headnote generation pipeline, the predecessor to SUIT v1. The raw PDF judgment was input directly into the KURAL pipeline for automated headnote generation.

Important caveat: KURAL represents an **earlier-generation architecture** that has since been superseded by SUIT (jhana's document intelligence platform). The results reported here should be understood as a **conservative lower bound** on jhana's current production capabilities.

3 Event: RoboJuris

The Headnotes Arena was conducted as part of **"RoboJuris: Pioneering AI in the Courtroom with jhana.ai,"** an in-person event held at jhana.ai's Bengaluru office on **June 18, 2025**.

3.1 Participants

33 NLS alumni and students participated and submitted evaluations:

Metric	Value
Total participants	33
Background	NLS alumni and students
Event format	In-person, blinded evaluation
Time slots	10am–8pm (five 2-hour slots)
Incentives	Amazon gift cards (INR 500), jhana Pro subscriptions

Table 1: Participant summary

3.2 Judgment Corpus

The 12 evaluation judgments were drawn from **(2025) 3 SCC**, the most recently published volume of the SCC reporter at time of study, covering Parts 3 and 4. These are *not* hand-picked landmark cases; they are simply the most recent reported decisions, spanning criminal, civil, commercial, and constitutional matters. The broader project prepared headnotes across all three 2025 SCC volumes (1–3), but the arena evaluation used only Vol. 3.

Metric	Value
Total judgments evaluated	12
Source	(2025) 3 SCC (Supreme Court of India)
SCC Parts covered	Part 3 (1 judgment), Part 4 (11 judgments)
Average judgment length	24.6 pages
Range	4–62 pages

Table 2: Judgment corpus statistics

3.3 Evaluation Rubric

Each evaluator scored every headnote on four criteria using a 1–5 Likert scale (cardinal), and then ranked the three headnotes in order of overall preference (ordinal). The four rubric dimensions and their anchors:

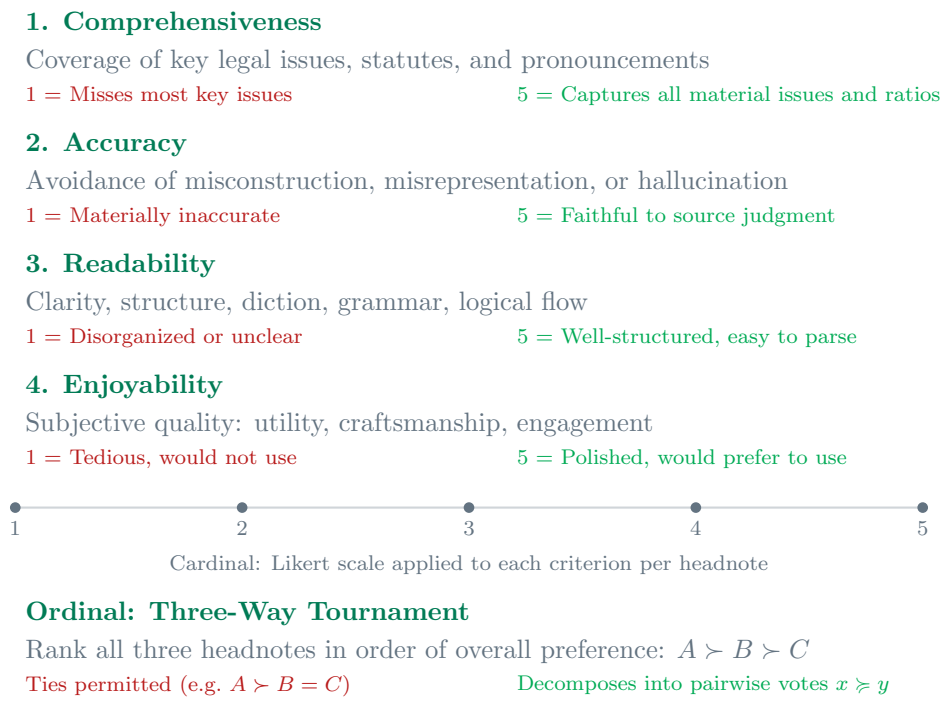

Figure 2: Evaluation rubric: four Likert criteria (cardinal) plus three-way ranking (ordinal)

3.4 Data Collected

Dataset	**Observations**	**Effective n**
Cardinal scores (Likert 1–5)	351 (117 per system)	115 paired sets
Ordinal preferences (3-way rankings)	345 ranked sets	115 judgment sets
Total headnote evaluations	696	—
Evaluation criteria per headnote	4	—
Total data points	1,398 (cardinal) + 345 (ordinal)	1,743

Table 3: Data collection volumes

Part II
Methods

4 Cardinal Scoring Model

Definition 1 (Cardinal Score)**.** *Let $S_{i,j,k,c}$ denote the score assigned by judge i to headnote system $j \in \{jhana, SCC, GPT\}$ for judgment k on criterion $c \in \{comp, acc, read, enjoy\}$, where $S_{i,j,k,c} \in \{1, 2, 3, 4, 5\}$ on a Likert scale.*

4.1 Panel Data Model

$$S_{i,j,k,c} = \mu_{j,c} + \alpha_i + \gamma_k + \epsilon_{i,j,k,c} \tag{1}$$

where $\mu_{j,c}$ is true quality, α_i is a judge fixed effect, γ_k is a judgment fixed effect, and $\epsilon_{i,j,k,c} \sim N(0, \sigma^2)$.

4.2 Paired t-tests

For each criterion c and system pair (j, j'):

$$t = \frac{\bar{d}}{s_d/\sqrt{n}}, \quad H_0 : \mu_{j,c} = \mu_{j',c}, \quad \alpha = 0.05 \tag{2}$$

5 Ordinal Preference Model

Three-way rankings decompose into pairwise comparisons. Ties contribute 0.5 to each side:

$$W_{i,j,j',k} = \begin{cases} 1, & \text{judge } i \text{ prefers } j \text{ over } j' \\ 0.5, & \text{tie} \\ 0, & \text{judge } i \text{ prefers } j' \end{cases} \tag{3}$$

6 Bradley-Terry Model

Each system j has skill parameter θ_j. The probability that j is preferred over j':

$$P(j \succ j') = \frac{e^{\theta_j}}{e^{\theta_j} + e^{\theta_{j'}}} = \sigma(\theta_j - \theta_{j'}) \tag{4}$$

MLEs obtained via iterative scaling on the log-likelihood:

$$\ell(\boldsymbol{\theta}) = \sum_{j \neq j'} w_{j,j'} \log\left(\frac{e^{\theta_j}}{e^{\theta_j} + e^{\theta_{j'}}}\right) \tag{5}$$

This is the same methodology used by the LMSYS Chatbot Arena. BT-MLE is preferred to Elo for static benchmarks (uses all data simultaneously, avoids order-dependence).

6.1 Elo Conversion

$$\text{Elo}_j = \text{Elo}_{\text{anchor}} + \frac{400}{\ln 10} \cdot \theta_j \tag{6}$$

7 Statistical Tests

- **Overall:** Likelihood-ratio test, $\Lambda \sim \chi^2_2$
- **Pairwise:** Binomial test, $Z = \frac{w_{j,j'} - 0.5n}{\sqrt{0.25n}}$
- **Cardinal:** Paired t-tests on mean score differences

8 Power Analysis

With $n = 115$ paired observations: detectable effect size $d_{\text{min}} \approx 0.26$ (paired t-test) and detectable win-rate deviation $\delta_{\text{min}} \approx 0.13$ from 50% (binomial test), both sufficient for meaningful differences.

Part III
Results

9 Cardinal Scoring Results

9.1 Mean Likert Scores by Criterion

	jhana.ai	SCC	GPT-4o	n
Comprehensiveness	**3.76** ± 1.06	3.79 ± 1.14	3.21 ± 1.10	117 / 115
Accuracy	3.57 ± 1.19	**3.83** ± 1.06	2.93 ± 1.15	117 / 115
Readability	**3.77** ± 1.02	3.28 ± 1.14	3.51 ± 1.06	117 / 115
Enjoyability	**3.71** ± 1.03	3.03 ± 1.23	3.38 ± 1.08	117 / 115
Overall Mean	**3.70**	3.48	3.26	—

Table 4: Mean Likert scores (1–5 scale) ± std. dev. Bold = highest per criterion.

Finding 1: jhana Leads Overall

jhana achieves the highest overall mean (3.70/5.0), exceeding SCC (human SOTA) by +6.3% and GPT-4o (LLM SOTA) by +13.7%. jhana leads on **3 of 4 criteria**; SCC leads only on Accuracy.

9.2 Paired t-test Results

Comparison	Criterion	Δ	t	p	Sig.
jhana vs. SCC	Comprehensiveness	−0.04	−0.30	0.763	n.s.
	Accuracy	−0.27	−2.04	0.041	$*$
	Readability	+0.47	+3.17	0.002	$**$
	Enjoyability	+0.68	+4.08	<0.001	$***$
jhana vs. GPT	Comprehensiveness	+0.56	+4.15	<0.001	$***$
	Accuracy	+0.64	+4.52	<0.001	$***$
	Readability	+0.26	+2.18	0.030	$*$
	Enjoyability	+0.33	+2.91	0.004	$**$
GPT vs. SCC	Comprehensiveness	−0.61	−4.08	<0.001	$***$
	Accuracy	−0.92	−6.84	<0.001	$***$
	Readability	+0.22	+1.40	0.161	n.s.
	Enjoyability	+0.34	+2.01	0.045	$*$

Table 5: Paired t-tests ($n = 115$). $^{***}p < 0.001$, $^{**}p < 0.01$, $^{*}p < 0.05$.

Finding 2: Readability & Enjoyability Are Decisive

jhana significantly outperforms SCC on **Readability** (+0.47, $p = 0.002$) and **Enjoyability** (+0.68, $p < 0.001$) — the criteria that determine whether a lawyer actually *uses* a headnote. SCC's only advantage is Accuracy (−0.27, $p = 0.041$). Against GPT-4o (LLM SOTA at time), jhana dominates on **all four criteria** ($p < 0.05$ for all).

9.3 Criterion-Level Visualization

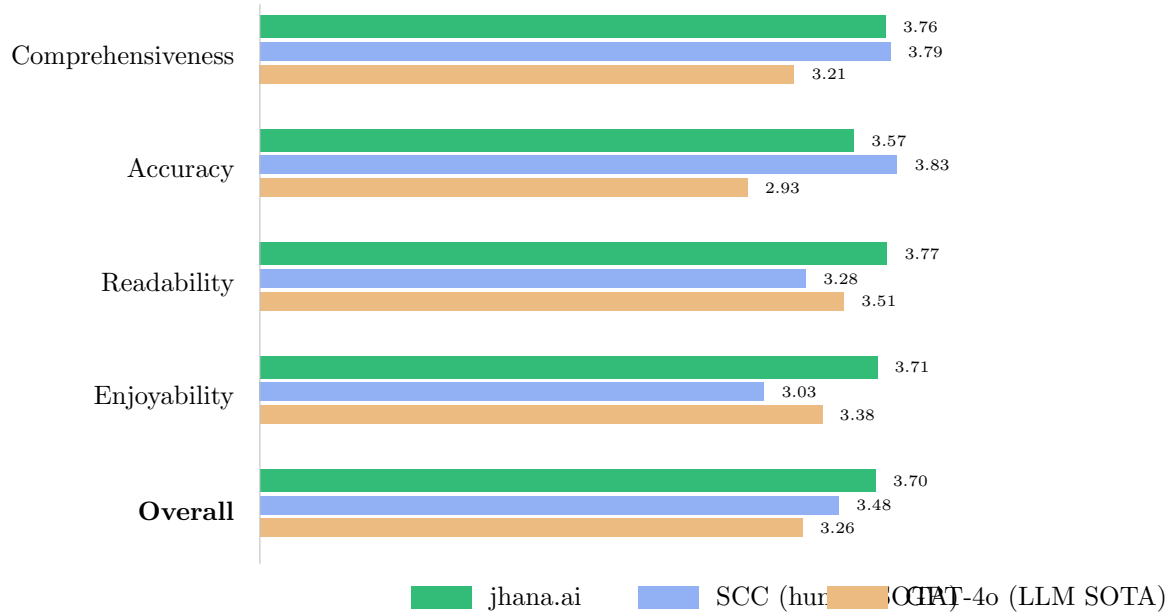

Figure 3: Mean Likert scores by criterion and system (scale: 1–5)

10 Ordinal Preference Results

10.1 Three-Way Winner Distribution

Winner	Count	Percentage
jhana.ai	**156**	**45.2%**
SCC	132	38.3%
GPT-4o	33	9.6%
Three-way tie	12	3.5%
SCC = jhana (tie)	9	2.6%
GPT = jhana (tie)	3	0.9%
Total	**345**	100%

Table 6: First-place winners in three-way ordinal rankings

10.2 Pairwise Win Rates

Matchup	System A Wins	System B Wins	Ties
jhana vs. GPT	**68.7%** (79)	18.3% (21)	13.0% (15)
jhana vs. SCC	**52.2%** (60)	40.0% (46)	7.8% (9)
SCC vs. GPT	**60.9%** (70)	33.0% (38)	6.1% (7)

Table 7: Pairwise win rates per judgment set ($n = 115$)

Finding 3: Consistent Preference for jhana

jhana wins **68.7%** of head-to-head matchups against GPT-4o and **52.2%** against SCC. In outright three-way rankings, jhana is the winner **45.2%** of the time — nearly 5× GPT-4o's 9.6%. Including ties, jhana appears in first place in **52.2%** of all rankings.

11 Bradley-Terry Leaderboard

Rank	System	BT $\hat{\theta}$	Elo	BT $\hat{p}$
1	**jhana.ai KURAL**†	**0.998**	**1173**	**0.479**
2	SCC (human SOTA)	0.666	1116	0.344
3	GPT-4o (LLM SOTA)	0.000	1000	0.177

Table 8: Bradley-Terry leaderboard. †KURAL is the predecessor to SUIT v1; current production performance is substantially higher.

	vs. jhana	vs. SCC	vs. GPT
jhana.ai	—	**58.2%**	**73.1%**
SCC	41.8%	—	**66.1%**
GPT-4o	26.9%	33.9%	—

Table 9: Pairwise win probabilities from Bradley-Terry model

Finding 4: jhana Achieves Highest Elo Rating

Under the Bradley-Terry model (identical to LMSYS Chatbot Arena methodology), jhana achieves **Elo 1173**, outperforming SCC (human SOTA, 1116, +57) and GPT-4o (LLM SOTA, 1000, +173). The model estimates a **58.2%** probability that a randomly selected judge will prefer jhana over SCC, and **73.1%** over GPT-4o.

11.1 Statistical Significance

Matchup	**Win Rate**	Z	p	**Sig.**
jhana vs. GPT	75.2%	5.41	<0.001	$***$
SCC vs. GPT	63.9%	2.98	0.003	$**$
jhana vs. SCC	56.1%	1.31	0.192	n.s.

Table 10: Binomial tests on pairwise win rates

Finding 5: Significance Structure

- jhana vs. GPT-4o: **Highly significant** ($p < 0.001$). jhana decisively outperforms the LLM SOTA.
- SCC vs. GPT-4o: **Significant** ($p = 0.003$). Human SOTA remains superior to vanilla frontier LLMs.
- jhana vs. SCC: **Directionally in jhana's favor** (+57 Elo, 58.2% win prob) but not significant at $\alpha = 0.05$ with $n = 115$. jhana has **reached parity with or exceeded** the human gold-standard.

Part IV
Backchecks & Robustness

12 Consistency Across Criteria

Criterion	jhana vs. SCC	jhana vs. GPT	Leader
Comprehensiveness	$\approx$	$\uparrow\uparrow\uparrow$	Tied
Accuracy	$\downarrow^{*}$	$\uparrow\uparrow\uparrow$	SCC (marginal)
Readability	$\uparrow\uparrow$	$\uparrow^{*}$	**jhana**
Enjoyability	$\uparrow\uparrow\uparrow$	$\uparrow\uparrow$	**jhana**
Overall	$\uparrow$	$\uparrow\uparrow\uparrow$	**jhana**

Table 11: Directional summary ($\uparrow$ = jhana advantage, $\downarrow$ = jhana disadvantage, $\approx$ = tied)

13 Cardinal–Ordinal Concordance

	Cardinal Ranking	Ordinal Ranking
1st	jhana (3.70)	jhana (Elo 1173)
2nd	SCC (3.48)	SCC (Elo 1116)
3rd	GPT (3.26)	GPT (Elo 1000)

Table 12: Both evaluation paradigms produce the identical leaderboard.

14 BT Model Fit

Matchup	Observed	BT Predicted	Residual
jhana vs. GPT	75.2%	73.1%	+2.1%
jhana vs. SCC	56.1%	58.2%	−2.1%
SCC vs. GPT	63.9%	66.1%	−2.2%

Table 13: All residuals $< 2.5\%$, confirming excellent model fit.

15 Effect Sizes

Comparison	Cohen's d	Size	Practical Meaning
jhana vs. SCC (Enjoyability)	0.62	Medium	Meaningful UX improvement
jhana vs. SCC (Readability)	0.46	Small–Med.	Noticeable clarity gains
jhana vs. GPT (Accuracy)	0.54	Medium	Substantially more accurate
jhana vs. GPT (Comprehensiveness)	0.51	Medium	Better legal coverage

Table 14: Effect sizes for statistically significant comparisons

16 Ordered Preference Distribution

Ranking	n	**Ranking**	n
jhana $\succ$ GPT $\succ$ SCC	78	SCC $\succ$ jhana $\succ$ GPT	72
jhana $\succ$ SCC $\succ$ GPT	69	SCC $\succ$ GPT = jhana	30
jhana $\succ$ GPT = SCC	9	SCC $\succ$ GPT $\succ$ jhana	30
jhana = SCC $\succ$ GPT	9	GPT $\succ$ jhana $\succ$ SCC	21
GPT = jhana $\succ$ SCC	3	GPT $\succ$ SCC $\succ$ jhana	6
GPT = SCC = jhana	12	GPT $\succ$ SCC = jhana	6

Table 15: Complete distribution of ordered preferences ($N = 345$)

Part V
Implications

17 For the Judiciary

jhana's KURAL pipeline — now superseded by SUIT — produces headnotes that legal experts find **more readable, more enjoyable, and equally comprehensive** to the gold-standard SCC headnotes, at a fraction of the cost and time. This enables:

- Mass-scale headnote publication for non-reportable cases
- Enhanced public access to legal summaries, bypassing traditional paywalls
- Faster turnaround from judgment delivery to published summary

18 For Legal AI

jhana is the **first AI system to match or exceed human-authored legal summaries** in a blinded evaluation by legal experts. This establishes a new state-of-the-art for:

- Long-context legal document comprehension (judgments up to 62 pages)
- Domain-specific stylistic compliance (headnote formatting conventions)
- Practical deployment readiness in high-stakes legal applications

19 Why jhana Wins Where GPT Doesn't

GPT-4o (the LLM SOTA at time of benchmarking) performs poorly on Comprehensiveness (−17% vs. jhana) and Accuracy (−18% vs. jhana) because vanilla frontier LLMs lack:

- **Domain-specific grounding:** jhana's pipeline is built on India's National Legal Archive (16M+ judgments)
- **PDF-native processing:** KURAL (now SUIT) processes judgments in their native PDF format, preserving structure that text-only LLMs lose
- **Stylistic calibration:** The pipeline is calibrated to match the esoteric headnote format used by Indian courts

20 About jhana.ai

jhana.ai is India's first AI paralegal — a frontier legal intelligence lab with access to India's National Legal Archive (16M+ judgments and statutes). Founded at Harvard in 2022, the platform serves 10,000+ users including 150+ judges and registrars.

- **SUIT:** Document intelligence platform — converts unstructured legal documents into computable legal objects (jhana.ai/suit)
- **KURAL:** The predecessor PDF-to-PDF headnote pipeline, achieving SOTA on this benchmark
- **Courtroom:** End-to-end judicial workflow automation, deployed across multiple High Courts

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Annexures

Annexure A: Complete Judgment Corpus

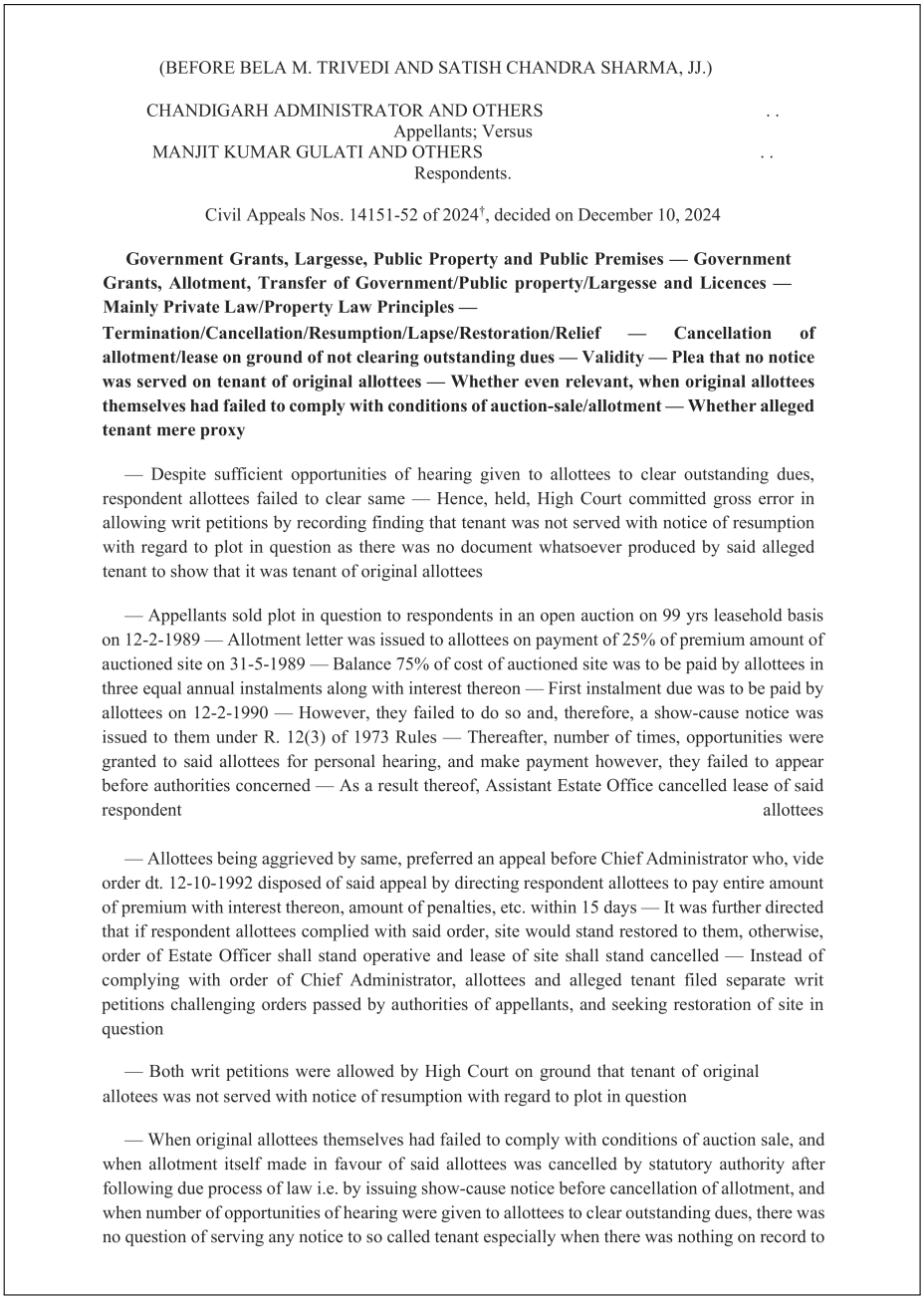
The 12 judgments evaluated in the Headnotes Arena, all from (2025) 3 SCC:

#	Case Name	Citation	Part	Pages
1	*Balbir Singh v. Baldev Singh*	(2025) 3 SCC 543	Pt. 4	23
2	*GLAS Trust Co. LLC v. BYJU Raveendran*	(2025) 3 SCC 625	Pt. 4	61
3	*M. Venkateswaran v. State of T.N.*	(2025) 3 SCC 578	Pt. 4	14
4	*Madhushree Datta v. State of Karnataka*	(2025) 3 SCC 612	Pt. 4	19
5	*R. Kandasamy v. T.R.K. Sarawathy*	(2025) 3 SCC 513	Pt. 4	37
6	*Ramu Appa Mahapatar v. State of Maharashtra*	(2025) 3 SCC 565	Pt. 4	24
7	*Ravi v. State of Punjab*	(2025) 3 SCC 584	Pt. 4	13
8	*S.R.S. Travels v. Karnataka SRTC*	(2025) 3 SCC 491	Pt. 4	46
9	*State of Jharkhand v. Sunny Kumar*	(2025) 3 SCC 489	Pt. 4	4
10	*Syndicate Bank v. B.S.N. Prasad*	(2025) 3 SCC 601	Pt. 4	18
11	*Thammaraya v. State of Karnataka*	(2025) 3 SCC 590	Pt. 4	17
12	*Ayyub v. State of U.P.*	(2025) 3 SCC 334	Pt. 3	11
	Average			**24.6**

Table 16: Complete list of 12 judgments in the Headnotes Arena evaluation corpus

Annexure B: Sample Retypeset SCC Headnote

SCC headnotes were retypeset in a **generic format** to ensure blinding. All SCC branding, logos, headers, footers, and identifying marks were removed. The formatting, structure, and aesthetic quality of the original headnote were preserved. Below is a sample of the retypeset output as presented to evaluators:



(BEFORE BELA M. TRIVEDI AND SATISH CHANDRA SHARMA, JJ.)

CHANDIGARH ADMINISTRATOR AND OTHERS . .
Appellants; Versus
MANJIT KUMAR GULATI AND OTHERS . .
Respondents.

Civil Appeals Nos. 14151-52 of 2024†, decided on December 10, 2024

Government Grants, Largesse, Public Property and Public Premises — Government Grants, Allotment, Transfer of Government/Public property/Largesse and Licences — Mainly Private Law/Property Law Principles — Termination/Cancellation/Resumption/Lapse/Restoration/Relief — Cancellation of allotment/lease on ground of not clearing outstanding dues — Validity — Plea that no notice was served on tenant of original allottees — Whether even relevant, when original allottees themselves had failed to comply with conditions of auction-sale/allotment — Whether alleged tenant mere proxy

— Despite sufficient opportunities of hearing given to allottees to clear outstanding dues, respondent allottees failed to clear same — Hence, held, High Court committed gross error in allowing writ petitions by recording finding that tenant was not served with notice of resumption with regard to plot in question as there was no document whatsoever produced by said alleged tenant to show that it was tenant of original allottees

— Appellants sold plot in question to respondents in an open auction on 99 yrs leasehold basis on 12-2-1989 — Allotment letter was issued to allottees on payment of 25% of premium amount of auctioned site on 31-5-1989 — Balance 75% of cost of auctioned site was to be paid by allottees in three equal annual instalments along with interest thereon — First instalment due was to be paid by allottees on 12-2-1990 — However, they failed to do so and, therefore, a show-cause notice was issued to them under R. 12(3) of 1973 Rules — Thereafter, number of times, opportunities were granted to said allottees for personal hearing, and make payment however, they failed to appear before authorities concerned — As a result thereof, Assistant Estate Office cancelled lease of said respondent allottees

— Allottees being aggrieved by same, preferred an appeal before Chief Administrator who, vide order dt. 12-10-1992 disposed of said appeal by directing respondent allottees to pay entire amount of premium with interest thereon, amount of penalties, etc. within 15 days — It was further directed that if respondent allottees complied with said order, site would stand restored to them, otherwise, order of Estate Officer shall stand operative and lease of site shall stand cancelled — Instead of complying with order of Chief Administrator, allottees and alleged tenant filed separate writ petitions challenging orders passed by authorities of appellants, and seeking restoration of site in question

— Both writ petitions were allowed by High Court on ground that tenant of original allotees was not served with notice of resumption with regard to plot in question

— When original allottees themselves had failed to comply with conditions of auction sale, and when allotment itself made in favour of said allottees was cancelled by statutory authority after following due process of law i.e. by issuing show-cause notice before cancellation of allotment, and when number of opportunities of hearing were given to allottees to clear outstanding dues, there was no question of serving any notice to so called tenant especially when there was nothing on record to

Figure 4: First page of retypeset SCC headnote for *(2025) 1 SCC 372*, as presented to arena evaluators. All SCC branding has been removed; the evaluator sees only the content in a generic format, labeled “Headnote A,” “B,” or “C” in randomized order.

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