Frances Waldmann

Partner

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Los Angeles London



Frances Waldmann is a partner in Gibson Dunn's Los Angeles and London offices, Co-Chair of the Robotics Practice Group, and a member of the firm's Artificial Intelligence practice. She advises global companies on regulatory strategy, enforcement, and complex disputes involving technology and digital transformation, with a particular focus on AI.

Drawing on her cross-disciplinary, international perspective and technical fluency, Frances helps leading technology companies, fast-growth start-ups, and multinational businesses navigate novel legal and commercial risks that arise as AI and other emerging technologies reshape global frameworks governing data, content, competition, and online safety. Her practice spans regulatory counseling, product advisory, litigation defense, and enforcement before the FTC, DOJ, state attorneys general, and the European Commission, among other global regulators.

Frances is a go-to advisor for AI developers and digital platforms, with extensive experience in technical product counseling. She counsels clients across industries on the most challenging policy and compliance issues at the intersection of generative AI, child safety, and content moderation, shaping implementation strategies for CSAM obligations and evolving global liability frameworks.

Regulatory Counseling & Compliance. Advising on compliance requirements across global AI and digital regulatory frameworks—including the EU AI Act, DSA, GDPR, UK OSA, CCPA, and emerging U.S. state AI laws. Her focus areas include advising frontier AI labs and companies in highly-regulated industries on EU AI Act readiness, system classification, agentic AI governance, and open-source strategy.

Product Advisory. Advising on the design, governance, deployment, and commercialization of AI systems—from state-of-the-art foundation models and generative tools to high-autonomy agentic systems and complex decision-making architectures—including system-level accountability and liability frameworks, content and data licensing, and the development of safety classification and risk disclosure regimes.

Litigation, Investigations, and Enforcement. Representing technology companies and digital platforms in complex disputes, enforcement actions, and transnational investigations related to AI and platform functionality, including claims related to algorithmic fairness, content moderation, antitrust & competition, model transparency, and data privacy.

Corporate Governance & Transactions. Counseling boards and senior executives on AI governance, risk oversight, and disclosure obligations—including emerging expectations around transparency, accountability, and "AI-washing"—and managing technical and regulatory due diligence for high-value M&A and strategic investments, assessing risks associated with training data provenance, IP rights, and compliance readiness under global AI regulatory frameworks.

Capabilities

Artificial Intelligence
Anti-Corruption & FCPA
Antitrust and Competition
Consumer Protection
Privacy, Cybersecurity, and Data Innovation
Robotics
State Attorneys General
Tech and Innovation
Technology Litigation
White Collar Defense and Investigations

Credentials

Education

Worcester College - University of Oxford - 2009 Masters
Magdalen College - University of Oxford - 2008 BA (Hons) Jurisprudence

Admissions

California Bar
New York Bar
England & Wales - Barrister

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Representative Matters

- Advising frontier AI developer on EU AI Act classification and compliance strategy, including training data transparency and engagement with the European AI Office.
- Counseling a leading AI developer on strategy, governance, and regulatory compliance for agentic AI systems, including evolving legal frameworks for accountability, safety, and liability.
- Represented a digital platform in landmark class action litigation alleging algorithmic-driven harms to minors.
- Advising major AI developers on compliance with child-safety and CSAM obligations under U.S. federal, state, and global laws, including emerging regulatory expectations around AI-generated CSAM.
- Advising high profile AI lab on the development and release of open-source training datasets and models.
- Counseling companies across industries on emerging global AI transparency and governance requirements, including to develop unified training data transparency strategies to satisfy both the EU AI Act's General-Purpose AI obligations and emerging U.S. state laws like California's AB 2013.
- Advising leading generative AI company on privacy and product liability frameworks for voice, speech, and translation technologies.
- Represented a technology company in a non-public FTC investigation related to disclosures regarding the use of consumers' personal information.
- Represented a major technology company in a Sherman Act Section 2 monopolization case.

Thought Leadership & Pro Bono

A recognized thought leader in AI law and governance, Frances regularly presents on developments in AI regulation, ethics, and compliance at major industry events and academic forums. She has been quoted by *Law360* and *The American Lawyer* and is a frequent panelist on topics including AI regulation, algorithmic accountability, and the future of AI liability.

Frances devotes substantial time to pro bono matters, including related to AI and privacy. She was awarded Gibson Dunn's Frank Wheat Memorial Award for her contributions to the firm's efforts related to policing accountability, including a collaboration with the Leadership Conference Education Fund on a comprehensive report and toolkit on police reform in the United States.

Before joining Gibson Dunn, Frances practiced at a leading set of barristers' chambers in London. She is a native German speaker.

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