

LIMITED LICENSE LEGAL TECHNICIAN (LLLT) BOARD
AGENDA for March 11, 2019

Washington State Bar Association
1325 Fourth Avenue – Suite 600
Seattle, Washington 98101
1:00 p.m. to 4:00 p.m.

1. **Call to Order/Preliminary Matters** (1:00 p.m.)
 - Introductions
 - Outreach Update
 - Approval of Meeting Minutes – **ACTION**
2. **Vice Chair Selection – ACTION** (Steve Crossland) (1:10 p.m.)
3. **LLLT Board Training** (Steve Crossland & Renata Garcia) (1:20 p.m.)
4. **Enhancement Workgroup** (Steve Crossland) (1:45 p.m.)
5. **Committee Reports** (Committee Chairs) (2:00 p.m.)
6. **Trust Account Recommendation Update** (Jeanne Dawes) (2:40 p.m.)
7. **Yakima College Update** (Stephanie and Nancy) (3:00 p.m.)

MEETING MATERIALS

1. Outreach Update
2. February 11, 2019 Draft Meeting Minutes
3. Trust Account Recommendation Update
4. Additional Comments Received by the Supreme Court



LIMITED LICENSE LEGAL TECHNICIAN (LLLT) BOARD

UPDATE: March 2019

| Outreach & Press |
|--|
| <p>Press:</p> <ul style="list-style-type: none">▪ No new articles since the last meeting <p>Recent Events:</p> <ul style="list-style-type: none">▪ February 25, 2019: LLLT Exam▪ February 27, 2019 – March 1, 2019: Washington School Counselor Association Conference (see photo below)▪ March 6, 2019 – Spring Career Panel at Showalter Middle School <p>Upcoming Events:</p> <ul style="list-style-type: none">▪ April 4, 2019: Career Day at Foster High School▪ May 8, 2019: Career and Employment Services Counsel spring meeting, Walla Walla Community College |
| Statistics & Other Events |
| <ul style="list-style-type: none">▪ Number of current LLLTs: 39▪ 4 LLLTs are inactive |
| Meetings |
| <p>Recent:</p> <ul style="list-style-type: none">▪ February 11, 2019: LLLT Board Meeting and New Practice Area Workgroup Meeting <p>Upcoming:</p> <ul style="list-style-type: none">▪ April 8, 2019: LLLT Board Meeting |





1325 4th Avenue | Suite 600 | Seattle, WA 98101-2539
206-733-5912 | renatag@wsba.org | LLLT@wsba.org | www.wsba.org

Trust Account Recommendation Update – NO ACTION REQUIRED

Background:

Per the July 31, 2017 Memorandum from the Committee on Professional Ethics to the LLLT Board, the Trust Account Signatory subcommittee recommendation included striking “admitted to practice law” from RPC 1.15A(h)(9). Please see attached CPE memo, Ex. 1. Removing “admitted to practice law” would make this rule consistent with ELC 14.2 which does not preclude a suspended or disbarred lawyer from disbursing trust account funds to clients.

At the February 11, 2019 LLLT Board meeting, the LLLT Board Trust Account Committee made the following recommendation which was approved by the LLLT Board:

LLLT RPC 1.15(h)(9) Revision “Only an LLLT or lawyer **admitted to practice law** may be an authorized signatory on the account. ~~If a lawyer is associated in a practice with one or more LLLT’s, any check or other instrument requiring a signature must be signed by a signatory lawyer in the firm.~~”

Update:

Noticing the discrepancy between CPE’s original recommendation and the LLLT Board approved version of the proposed amendment; staff contacted the committee to establish if a revision was necessary. In the meantime, it was brought to our attention that at its December 15, 2017 CPE meeting, a motion was made to adopt the recommendation to strike “admitted to practice law” but the motion failed. Please see item 10 of the attached meeting minutes, Ex. 2.

MEMORANDUM

To: Limited License Legal Technician Board
From: Committee on Professional Ethics
Date: July 31, 2017
Re: RPC 1.15A(h)(9) and LLLT RPC 1.15A(h)(9)

The Committee on Professional Ethics received an inquiry about whether a lawyer who is not on active status may sign trust account checks. In considering this inquiry, the subcommittee noticed what appears to be a mistake in the second sentence of RPC 1.15A(h)(9). That sentence states, "If a lawyer is associated in a practice with one or more LLLT's, any check or other instrument requiring a signature must be signed by a signatory lawyer in the firm." This means that if a law firm has an LLLT who is not part of the firm as a signatory on its trust account, the LLLT would be able to sign a check alone, while an LLLT who is part of that firm would not be permitted to do so. Although it would be uncommon for a firm to have an LLLT who is not part of the firm as a signatory on its trust account, it is conceivable that a sole practitioner might do so to have someone available to sign trust account checks in the event of death or disability. We were informed by Doug Ende that this was not the intent of that sentence.

Because fixing that sentence affects LLLTs, we would like to obtain feedback from the LLLT Board. The subcommittee has recommended that the sentence be stricken for the reasons noted in the attached memo. We welcome your comments on that proposal.

Attachment: Trust Account Signatory Subcommittee Memo dated April 14, 2017

FROM Trust Account Signatory Subcommittee (Colin Folawn, Anne Seidel, Ted Stiles)
TO: CPE
RE: Retired lawyer signing trust account checks (proposed rule change)
DATE: April 14, 2017

As discussed in our August 18, 2016 memo, our subcommittee concluded that the RPCs are not clear about whether a lawyer who is not on active status can sign a trust account check. We are therefore proposing a rule change to clarify this. We are also proposing a rule change to address an incongruity in the second sentence of RPC 1.15A(h)(9) regarding LLLTs.

Background of RPC 1.15A(h)(9)

RPC 1.15A(h)(9) states:

(h) A lawyer must comply with the following for all trust accounts:

...

(9) Only a lawyer admitted to practice law or an LLLT may be an authorized signatory on the account. If a lawyer is associated in a practice with one or more LLLT's, any check or other instrument requiring a signature must be signed by a signatory lawyer in the firm.

Before the 2006 RPC amendments, anyone could be a signatory on a trust account and law firms frequently had bookkeepers or other nonlawyer staff as signatories. Ethics 2003 proposed that RPC 1.15A restrict signatories to lawyers to protect against theft by nonlawyers employed at a law firm. There is no discussion in the legislative history of what is meant by "lawyer admitted to practice."

Proposed rule change regarding lawyers as signatories on trust accounts

The following proposal simply removes the requirement that a lawyer be "admitted to practice law" to be a signatory on a trust account. The proposal would make RPC 1.15A consistent with ELC 14.2. That rule prohibits suspended and disbarred lawyers, as well as those who have resigned in lieu or been transferred to disability inactive status, from continuing to practice law. However, ELC 14.2(b) states that the prohibition "does not preclude [such a lawyer] from disbursing assets held by the lawyer to clients." If the ELC does not preclude a suspended or disbarred lawyer from disbursing trust account funds to clients, RPC 1.15A should similarly permit lawyers not on active status to sign trust account checks.

This change would mean that lawyers and LLLTs are treated the same as far as their ability to be signatories on a trust account. As currently written, an LLLT does not need to be "admitted" to be a signatory on a trust account.

The proposed change is as follows:

(h) A lawyer must comply with the following for all trust accounts:

...

(9) Only a lawyer ~~admitted to practice law~~ or an LLLT may be an authorized signatory on the account. . . .

Additional comment:

Only a lawyer or LLLT on active status may open a trust account. A lawyer or LLLT may continue to be an authorized signatory on a trust account even if no longer on active status. However, a lawyer who is not on active status may not engage in the unauthorized practice of law and may not use the trust account if under the particular circumstances doing so would imply that the lawyer is authorized to practice law. *See* RPC 5.5(a), (b)(2).

Ted has the following concerns about the second sentence of the proposed comment, which he would like the full committee to discuss at the next meeting:

As drafted, the comment would appear to permit an inactive lawyer to maintain a trust account for an indefinite period of time. In the case of an L&I attorney who collects contingent fees from periodic payments, and who retires while the payment stream is running, the comment would allow the inactive lawyer to continue to maintain the account for years, if not a decade or more, considering that a pension award may run for the life of the pensioner, and in some circumstances for the life of the pensioner's spouse. The Association apparently is not set up to monitor or audit trust accounts after a lawyer becomes inactive. Should we endorse the type of situation in which an inactive lawyer is handling funds belonging to others, but is free from Association audit oversight? Also questions regarding the IOLTA requirements—applicable to inactive lawyers? Will banks agree to let inactive lawyers maintain IOLTA accounts?

Proposed rule change regarding LLLTs as signatories on trust accounts

The second sentence of RPC 1.15A(h)(9) reads, "If a lawyer is associated in a practice with one or more LLLT's, any check or other instrument requiring a signature must be signed by a signatory lawyer in the firm." This means that an LLLT who is not part of a law firm would be able to sign a check alone, while an LLLT who is part of that firm would not be permitted to do so. According to Doug Ende, this was not the intent of that sentence.

Our subcommittee considered whether to propose rewording this provision to prevent all LLLTs from signing trust account checks without a lawyer's additional signature. We do not believe that is necessary. LLLTs are licensed law professionals, so an LLLT who stole from a trust account would be subject to discipline. We therefore do not believe permitting LLLTs to sign trust account checks presents the same risk as permitting nonlawyers to do so.

In addition, banks process checks electronically, so it is extremely unlikely that a bank would be able to enforce a two-signature requirement. So if an LLLT is listed as a signatory, the bank would process a check signed by the LLLT alone. The two signature requirement is only an internal control. As such, it would not prevent an LLLT from stealing from the trust account.

Our subcommittee considered whether to limit an LLLT's authority to sign trust account checks to those relating to cases within the LLLT's license. We do not believe such a limitation would be helpful. First, as mentioned above, a bank would not be able to enforce such a restriction so it would not prevent theft from the account. Second, if the LLLT did not handle the trust account appropriately, the LLLT could be subject to discipline (although the current LLLT RPCs could be clearer in that regard if the misconduct is merely recordkeeping). Third, permitting LLLTs to be signatories on lawyer trust accounts will make LLLTs more attractive to law firms and help integrate them into the profession. Finally, allowing LLLTs to issue trust account checks for all matters is consistent with RPC 5.9(a)(1), which permits LLLTs to share fees from cases that are outside their limited licenses.

We recommend that the second sentence of RPC 1.15A(h)(9) be struck. With the two proposed changes, that subsection would read as follows:

(9) Only a lawyer admitted to practice law or an LLLT may be an authorized signatory on the account. ~~If a lawyer is associated in a practice with one or more LLLTs, any check or other instrument requiring a signature must be signed by a signatory lawyer in the firm.~~

WASHINGTON STATE

BAR ASSOCIATION

Committee on Professional Ethics

Meeting Minutes

December 15, 2017

The committee met at the offices of the Washington State Bar Association, 1325 4th Avenue, Suite 600, Seattle, WA 98101.

Members Present: Don Curran (chair), Tom Andrews, Natalie Cain, Colin Folawn, Brooks Holland, Anne Seidel, Callie Castillo, Lucinda Fernald, and Jeanne Marie Clavere (staff liaison). Mark Fucile and Kyle Sciuchetti (BOG) were excused.

Also in attendance: Doug Ende (Chief Disciplinary Counsel), Peter Jarvis (Holland Knight), Art Lachman (Attorney at Law), Renata de Carvalho (RSD Manager Innovative Licensing Programs), Jean McElroy (Chief Regulatory Counsel), Cheryl Heuett (Senior Auditor), and Darlene Neumann (paralegal).

The meeting was called to order at 10:02 a.m.

The minutes were approved as amended.

1. Announcements/Updates

- Three positions will open on the committee next year due to term limits (of which 1 position may be re-appointed). Members were encouraged to reach out to those who might be interested in applying.
- Kyle Sciuchetti, Governor of District 3, is the committee's new BOG liaison.
- Amendments to RPC 1.0A, 1.10, and 1.11 proposed by the CPE regarding public defender imputation of conflicts were recently adopted by the Court and will become effective September 1, 2018.
- Suggested amendments to RPC 1.6, 1.7, 1.15A, 4.2, 7.3, and 8.4 recommended by the CPE and approved by the BOG were recently published for comment by the Court with the comment period ending April 30, 2018.
- Natalie Cain and Lucinda Fernald will represent the CPE at the WSBA's MentorMixer event on Jan. 25, 2018.

2. Quadripartite Subcommittee

The subcommittee sought clarification from the committee on specific industries where the opinion could be applied and agreed to include several generic fact scenarios that may be helpful to readers in interpreting the opinion. The subcommittee will prepare a revised draft for the next meeting.

3. Advisory Opinion 2223 Subcommittee

The subcommittee discussed their opinions on AO 2223, how it might be clarified or allowed to remain. The subcommittee conceded they have been unable to reach a consensus on any singular approach thus far. The committee suggested the subcommittee put together a memo of options for consideration at the next meeting.

4. RPC 4.2 Communication with Government Employee Client

The subcommittee reported only a few comments were received from sections to their request for feedback. The committee discussed approaching the issue from a different angle, such as offering a concrete proposal or information memo that section members could focus and provide comment on. The subcommittee will consider various alternatives, including working with bar staff on supplemental outreach to sections.

5. Amendments to Lawyer RPC due to proposed changes to LLLT RPC

Jean McElroy, Chief Regulatory Counsel, and Renata de Carvalho Garcia, Innovative Licensing Programs Manager, addressed the committee on specific changes to the lawyer RPC they plan to bring to the BOG in January because of the expansion in scope of practice for LLLTs. The changes would coordinate the lawyer RPC and the LLLT RPC.

The committee reviewed the lawyer RPC changes in detail. The most significant proposed change to the LLLT RPC, prompted by proposed changes to APR 28, would allow LLLTs to negotiate on behalf of their clients with lawyers representing parties, including limited court appearances by LLLTs. The committee discussed LLLT purchase of a law practice and suggested additional revisions to Comment [19] of RPC 1.17 to include general language regarding restrictions on the lawyer's ability to sell a law practice to a LLLT and references to see specific LLLT rules. The committee discussed the effect of the LLLT changes on the obligation of lawyers and the need to revisit Title 4 in the future to correct imbalances between the two sets of RPCs. Ms. McElroy and Ms. Garcia returned to the committee with revised Comment [19] and presented the draft. Following discussion, the committee voted to approve the proposed amendments to the lawyer RPC, including the revised draft of Comment [19] of RPC 1.17 suggested by the committee. The motion passed 7-1.

6. Lawyer Advertising Rules

The subcommittee discussed additional proposed changes to RPC 7.1, 7.3, and 5.5 following the committee's input at the October meeting. Comments to RPC 7.3 were simplified to remove inconsistencies between the comments and the revised rule regarding in-person and real-time

solicitations. Changes to RPC 5.5 and 7.1 addressed the issue of multijurisdictional practice, UPL, and lawyers working in branch offices. The committee discussed a recommendation that Washington adopt the APRL proposal to move the referral rule from RPC 7.2 to RPC 7.3(b).

Following discussion, the committee voted unanimously to approve the additional changes to RPC 7.1, 7.3, and 5.5, including a friendly amendment to approve any technical/formatting changes by staff in the final version submitted to the BOG, and delete “in such circumstances” in revised Comment [2] of RPC 7.3. Staff will submit the committee’s memo and proposed rule amendments to the BOG for their January 18-19, 2018 meeting. The chair thanked the members of the subcommittee for their efforts and hard work.

7. Arlene’s Flowers

The subcommittee presented several options to amend RPC 8.4(g) that included adopting the Model Rule and/or comments with changes to reflect Washington’s rule, or revising Washington’s rule, or adding a comment to clarify the last sentence in 8.4(g). Discussion followed on whether a rule change was necessary (e.g., a member confronting a specific situation), the long rule amendment process, and the likelihood of controversy that would follow. It was noted the adoption of the MR would not necessarily bridge the gap between (g) and (h) because the MR also includes the same reference to Rule 1.16. Further discussion followed on the ABA comments and two alternative comments drafted by members of the subcommittee.

Following discussion, the committee voted on the options presented.

- (a) The motion in favor of amending RPC 8.4(g) and to delete “solely” in the proposed language failed by a vote of 2-6.
- (b) The motion in favor of adding a comment to RPC 8.4(g) to address/clarify Rule 1.16 failed by a vote of 2-6.
- (c) The motion in favor of adopting Model Rule 8.4(g) and/or its comments with revisions to reflect WA specific rules failed by a vote of 3 to 5.
- (d) The committee expressed no inclination to issue an advisory opinion as an alternative option to proposing a rule change.

The staff liaison will inform the inquirer that the committee will take no further action.

8. Small Batch Subcommittee

The committee voted unanimously to withdraw a number of old trust account advisory opinions recommended by the subcommittee. The subcommittee will also return to the full committee with recommendations to modify or revise other older trust account opinions as time permits.

9. Lawyer Mobility Subcommittee

The subcommittee presented a revised draft opinion following comments received at the October meeting. Members discussed additional situations such as more than one primary lawyer or “principal handling attorney” working on a case; the leaving attorney or firm not wanting to continue representation of the client; the timing of notice to the firm and the clients; obtaining a client list for purposes of conflicts checking; and the issue of client files. Lucinda Fernald volunteered to help assist the subcommittee, which will prepare a revised draft.

10. Retired Lawyer Trust Account

The committee was joined by Cheryl Heuett, WSBA Senior Auditor, to discuss the proposed changes to RPC 1.15A(h)(9). Both Ms. Heuett and the Chief Disciplinary Counsel expressed concerns about amending the rule to remove “admitted to practice law”, which if adopted, would permit inactive lawyers to maintain trust accounts while not being subject to random audits. The subcommittee noted the changes are not applicable to L&I practice lawyers who must be active in order to receive L&I funds on behalf of their clients. The committee heard a suggestion that a comment could be added to the rule stating that a retiring lawyer should act within a reasonable amount of time to disburse trust account funds.

Following discussion, a motion was made to adopt the recommendation to remove “admitted to practice law” from RPC 1.15A(h)(9). The motion failed 3-4.

The committee discussed the second issue of LLLTs in a law firm being prohibited from signing trust account checks alone. The subcommittee had proposed removing the last sentence in RPC 1.15A(h)(9). The subcommittee had sent the proposal to the LLLT Board for feedback several months ago, but did not receive a substantive response. In an effort to engage the Board again, the subcommittee volunteered to send one of its members to address the Board in person. The committee chair agreed to contact the LLLT Board chair to request time before the Board to discuss the CPE concerns regarding the LLLT trust account issue.

11. Discretionary Matters

- Conflicts and Shelter Care Representation: Following discussion of the issue, the committee agreed to take on the inquiry. Don Curran volunteered to chair the subcommittee. Other volunteers were Lucinda Fernald and Brooks Holland. Mr. Curran will contact the inquirer to get additional details on the inquiry. *Update: Following the meeting, the chair learned from the inquirer that the situation had been resolved and an advisory opinion was no longer needed.*
- Negative Online Reviews: The committee decided to defer action pending a review of existing information on the topic published online by the Bar association.

The meeting adjourned at 2:18 p.m.

MEMORANDUM

TO: Committee on Professional Ethics
FROM: Limited License Legal Technician Board
RE: LLLT RPC 1.15A(h)(9)
DATE: March 11, 2019

At its February 11, 2019 meeting, the LLLT Board approved proposing the following change to LLLT RPC 1.15(h)(9):

~~"Only an LLLT or lawyer admitted to practice law may be an authorized signatory on the account. If a lawyer is associated in a practice with one or more LLLT's, any check or other instrument requiring a signature must be signed by a signatory lawyer in the firm."~~

Aside from not removing "admitted to practice law", the LLLT Board's proposed rule change essentially mirrors the recommendation made by the CPE Trust Account Signatory Subcommittee. See attached memo dated April 14, 2017.

MEMORANDUM

To: Limited License Legal Technician Board
From: Committee on Professional Ethics
Date: July 31, 2017
Re: RPC 1.15A(h)(9) and LLLT RPC 1.15A(h)(9)

The Committee on Professional Ethics received an inquiry about whether a lawyer who is not on active status may sign trust account checks. In considering this inquiry, the subcommittee noticed what appears to be a mistake in the second sentence of RPC 1.15A(h)(9). That sentence states, "If a lawyer is associated in a practice with one or more LLLT's, any check or other instrument requiring a signature must be signed by a signatory lawyer in the firm." This means that if a law firm has an LLLT who is not part of the firm as a signatory on its trust account, the LLLT would be able to sign a check alone, while an LLLT who is part of that firm would not be permitted to do so. Although it would be uncommon for a firm to have an LLLT who is not part of the firm as a signatory on its trust account, it is conceivable that a sole practitioner might do so to have someone available to sign trust account checks in the event of death or disability. We were informed by Doug Ende that this was not the intent of that sentence.

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Ted has the following concerns about the second sentence of the proposed comment, which he would like the full committee to discuss at the next meeting:

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We recommend that the second sentence of RPC 1.15A(h)(9) be struck. With the two proposed changes, that subsection would read as follows:

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SENT BY EMAIL

Clerk of the Supreme Court
P.O. Box 40929
Olympia, WA 98504-0929
supreme@courts.wa.gov

RECEIVED
FEB 13 2019

Washington State
Supreme Court

January 31, 2019

Dear Chief Justice Fairhurst,

I am writing to offer comments on the proposed amendments to APR 28, the admission to practice rule that creates the LLLT in Washington State.

I engaged a LLLT to help me with my own family law matter this year and was very disappointed that she was not able to participate in my mediation with me. Also, it was terrible that she was unable to speak to my opposing party because I felt had she been able to, **she could have helped us enormously**. I'm not sure why the LLLT has been so constrained but it seems like they could be more helpful with greater authority.

I encourage the Washington State Supreme Court to expedite the proposed amendments to APR 28 as soon as possible and to add as much authority as possible to the license for the benefit of the public.

Sincerely,

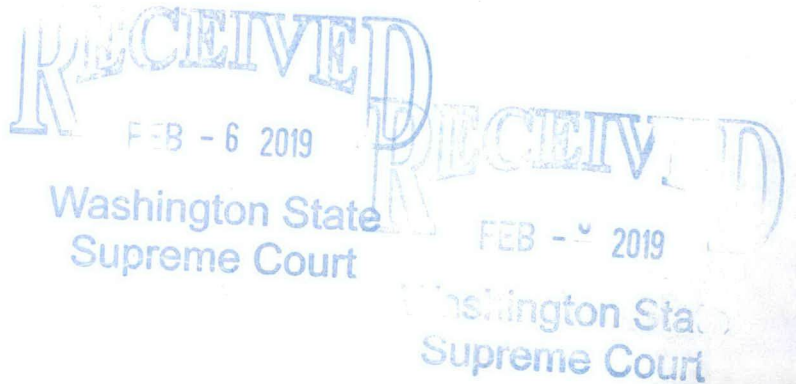
Azucena

Azucena Cisneros Pimentel
425-905-4508
Mukilteo, WA

SENT BY EMAIL

Clerk of the Supreme Court
P.O. Box 40929
Olympia, WA 98504-0929
supreme@courts.wa.gov

January 31, 2019



Dear Chief Justice Fairhurst,

I am writing to offer comments on the proposed amendments to APR 28, the admission to practice rule that creates the LLLT in Washington State.

I have sought the help of a LLLT firm recently and been very glad that help of that nature was available at that price and level of care. I have been grateful that the rules have been changed in time for me and my children to have benefitted.

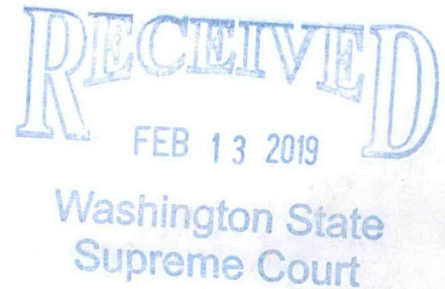
I strongly encourage the Supreme Court to expedite the implementation of its proposed amendments to APR 28 for the benefit of the people like me.

Sincerely,

Donna Chen
206-335-8456

SENT BY EMAIL

Clerk of the Supreme Court
P.O. Box 40929
Olympia, WA 98504-0929
supreme@courts.wa.gov



January 31, 2019

Dear Chief Justice Fairhurst,

I am writing to offer comments on the proposed amendments to APR 28, the admission to practice rule that creates the LLLT in Washington State.

I have engaged as an attorney with the LLLT firm My Legal Pit Stop, Legal Technicians over the last six months on behalf of their clients. I can tell you that the people I met through that collaboration have been especially grateful for the help they received.

I can also tell you that as a new attorney, I understand and can even sympathize with some of the resistance to LLLTs coming from within the legal industry. I do not believe however that the people I served would not have had any access to legal help without APR 28.

I strongly encourage the Washington State Supreme Court to expedite the implementation of its proposed amendments to APR 28.

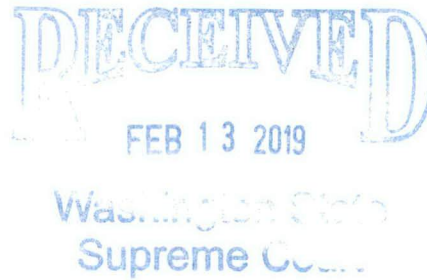
Sincerely,

A handwritten signature in black ink, appearing to read "Ian Booth", written over a horizontal line.

Ian Booth
WSBA # 53994

Clerk of the Supreme Court
P.O. Box 40929
Olympia, WA 98504-0929

January 31, 2019



Dear Chief Justice Fairhurst,

I am writing to offer comments on the proposed amendments to APR 28, the admission to practice rule that creates the LLLT in Washington State.

I'm a career technologist with a law degree who's spent much of the last few years watching LLLTs engage practical problems for real people under the regulations we have. I feel strongly that the top areas of continued development for the "movement" include (a) enabling greater Attorney-LLLT collaboration, much like nurses and doctors form care teams on behalf of patients, and (b) unlocking more negotiation and communication with opposing parties and counsel.

I encourage the Washington State Supreme Court to expedite the proposed amendments to APR 28 as soon as possible and to add as much authority as possible to the license for the benefit of the public.

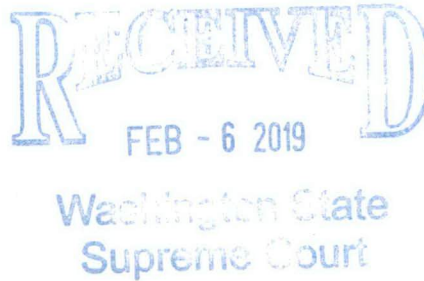
Sincerely,



Keith Vowell
920-268-7643
Everett, WA

SENT BY EMAIL

Clerk of the Supreme Court
P.O. Box 40929
Olympia, WA 98504-0929
supreme@courts.wa.gov



January 31, 2019

Dear Chief Justice Fairhurst,

I am writing to offer comments on the proposed amendments to APR 28, the admission to practice rule that creates the LLLT in Washington State.

I worked side by side over the last year with a LLLT firm that originally developed inside of a law firm I worked for. I can tell you that I have personally heard clients express enormous gratitude for the help they received. I have and will continue to refer people who otherwise may not have access to the legal help they need.

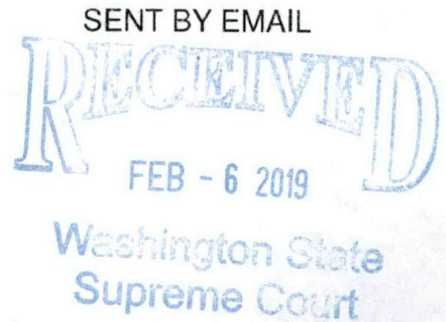
I encourage the Supreme Court to expedite the implementation of its proposed amendments to APR 28 for the benefit of the public.

Sincerely,

Oksana Salo

Oksana Salo
425-578-4409

Clerk of the Supreme Court
P.O. Box 40929
Olympia, WA 98504-0929
supreme@courts.wa.gov



January 31, 2019

Dear Chief Justice Fairhurst,

I am writing to offer comments on the proposed amendments to APR 28, the admission to practice rule that creates the LLLT in Washington State.

I found and worked with a LLLT over the last year to help me protect my grandchild. But if I had a nickel for every time my LLLT said to me, "I'm sorry but that exceeds the current scope of my license, we'll have to find some funding to get an attorney" I bet I'd not have had any legal fees at all. I was very frustrated that she was not allowed to speak for me in court, even though she was usually there, listening and quietly supporting me.

In my experience having had access to a LLLT who cared about me and my family was light years better than not having any help at all while we passed through a very stressful life experience. I encourage the Washington State Supreme Court to expedite the proposed amendments to APR 28 as soon as possible and to add as much authority to the license as it can for the benefit of families like mine.

Sincerely,

Staci Murrain

Staci Murrain
425-698-0388
Kent, WA

RECEIVED
FEB 13 2019

Washington State
Supreme Court

SENT BY EMAIL

Clerk of the Supreme Court
P.O. Box 40929
Olympia, WA 98504-0929
supreme@courts.wa.gov

January 31, 2019

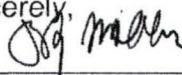
Dear Chief Justice Fairhurst,

I am writing to offer comments on the proposed amendments to APR 28, the admission to practice rule that creates the LLLT in Washington State.

I worked with a LLLT over the last year who is a friend of my family. **She made a difference for me.** There were times when I just couldn't see my way through what I was supposed to do to get divorced or protect my assets. She made an otherwise totally confusing process easier and less frustrating.

I encourage the Washington State Supreme Court to expedite the proposed amendments to APR 28 as soon as possible and to add as much authority to the license as it can for the benefit of families like mine.

Sincerely,



Tyler Miller
206-948-3844
Kent, WA