

**WASHINGTON STATE BAR ASSOCIATION
LAW CLERK BOARD**

MINUTES
February 3, 2023

Law Clerk Board Members in Attendance

- | | |
|---|---|
| <input checked="" type="checkbox"/> Emily Mowrey, Chair | <input type="checkbox"/> Alexa Ritchie |
| <input checked="" type="checkbox"/> Tracy Finnegan | <input checked="" type="checkbox"/> Christell Casey |
| <input type="checkbox"/> Michelle Myers | <input checked="" type="checkbox"/> Paul Drutman |
| <input checked="" type="checkbox"/> John Meyers | <input checked="" type="checkbox"/> Jim Reinhart |
| <input checked="" type="checkbox"/> Leone Reinbold | <input checked="" type="checkbox"/> Gary Epperley |
| <input checked="" type="checkbox"/> Benjamin Phillabaum | |

Staff and others in attendance for some or all of the meeting

Renata Garcia, Director of Regulatory Services Department; Bobby Henry, Associate Director of Regulatory Services Department; Jon Burke, Innovative Licensing Counsel; Katherine Skinner, Law Clerk Program Lead and Anne Trent, RSD Paralegal

Public Session

Approval of December 2, 2022 Meeting Minutes

The December 2, 2022 Law Clerk Board (Board) meeting minutes were approved.

Outreach and Updates

Katherine updated the Board on an upcoming presentation with the Alaska Bar Association. Leone and Emily shared that they will each present about the program to their local bar associations (Whatcom County and Okanogan County). Christell informed the Board that she presents to the Spokane Community College Paralegal Program each year and will continue to do so.

Bar Licensure Task For Alternatives to the Bar Exam

Renata updated the Board on the Bar Licensure Task Force and how it could impact those completing the Law Clerk Program. Renata encouraged the Board to attend the next task force meeting. Renata asked the Board to provide a recommendation or delegate the topic to the task force by the end of February.

Board Policies

Ben inquired with the Board what they would like to see in a draft for liaison guidelines and Board policies. Some suggestions included standardizing responses, creating a form with checkboxes or a policy of language the Board agrees to. The Board agreed they would like to see guidelines for consistency among Board members and for onboarding new members. Katherine will work with Ben to draft guidelines to bring to the next Board meeting.



Jurisprudence Committee

Emily called for volunteers to form a committee to review the program's jurisprudence book. The goal of the committee would be to review, reduce and add new books to the list using a newly developed policy on approving jurisprudence book requests. Leone, Christell, Jim and Gary volunteered for the committee. Any current requests to add a book to the list will be tabled until the new list is approved.

Cost Savings for Travel

Jim asked the Board whether it is cost effective to travel to the WSBA for in-person meetings. Katherine provided the Board with budget information and general projections. The Board agreed that keeping in-person meetings is essential for Board morale and will be sure to maximize ways to be cost conscious.

Executive Session

Requests

- The Board reviewed and approved one fourth year proposal
- The Board deferred four jurisprudence book requests for review with the Jurisprudence Committee

Applications

The Board approved four applications for enrollment in the Law Clerk Program beginning when the final confirmation letter is sent.

Evaluations

- The Board conducted five first-year evaluations and approved continuation in the program upon completion of all remaining first year coursework and book reports.
- The Board conducted one fourth-year evaluations and approved successful completion of the program upon submission of all remaining coursework and book reports.

Respectfully Submitted,

Katherine Skinner, Law Clerk Program Lead



Proposed Guidelines for Approving Books

APR 6 Regulation 2-3 A

Every law clerk is required to take the Jurisprudence course, which is a four-year reading program, intended to familiarize the law clerk with legal history, philosophy, theory, and biography.

APR 6 Regulation 7-1

Jurisprudence Reading. A four-year course of reading consisting of three (3) books each year, to be selected from a list approved by the Board. The Board has discretion to select and require specific books which must be read to meet this requirement.

An enrolled law clerk may submit requests to add a publication(s) to the current reading list. The Law Clerk Board in its sole discretion will use the following criteria in evaluation of each request:

- 1) The publication must have a substantial relationship to legal history, legal philosophy, legal theory, legal biography, or legal practice and/or procedure
- 2) If the requested publication is currently being used at a Washington law school, the publication may be approved
- 3) Clerks may not have more than one request pending at a time, and each request may have no more than five publications, submitted for review
- 4) Each request must contain a description about every publication as to how it meets the criteria above, including the title, a brief description of the publication, which category on the jurisprudence list it belongs to, ISBN number or direct link to the publication, and publication date.

History

Final Draft March 24, 2023

A proposal for the future of WA State Bar Admissions

Mission/Purpose

The purpose of this proposal is to give the Washington Supreme Court and the Washington State Bar Association more responsibility for and control over entry into the legal profession in order to: protect the public and improve trust in the legal profession. advance the cause of diversity equity and inclusion, ensure lawyer competency, and reduce barriers to entry into the legal profession.

Executive Summary

The best available data indicates that the bar exam disproportionately blocks historically marginalized groups from entering the practice of law.¹ In addition to the racism and classism written into the test itself² the time and financial costs of the test reinforce historical inequities in our profession.³ Despite these issues data indicates that the bar exam is minimally effective at best for ensuring competent lawyers.⁴ Among the deficiencies and common complaints

¹ While most states do not report demographic data on bar passage, the ABA recently conducted a study of first time test takers which showed white graduates were almost 40% more likely to pass the bar exam than Black graduates. <https://www.americanbar.org/news/abanews/aba-news-archives/2022/05/new-aba-data-breaks-down-bar-pass-rates/?login>

Those statistics are consistent with reports from states that do publish demographic data.

<https://www.calbar.ca.gov/Admissions/Law-School-Regulation/Exam-Statistics>

² The creation of the bar exam coincided with the first Civil Rights Act in 1875. After three Black lawyers were unintentionally granted membership in the ABA in 1914, their membership was revoked and a meeting was convened to discuss keeping the profession “pure.” A mandatory bar exam was part of the proposed solution. George B. Shepherd, “No African-American Lawyers Allowed: The Inefficient Racism of the ABA’s Accreditation of Law Schools,” 53 J. of Legal Education 103 (2003)

South Carolina maintained diploma privilege until 1950 when the first class of students were set to graduate from a Black law school at which time the bar exam was made mandatory to prevent “negroes and some undesirable whites” from entering the profession. Michael Boylan, *The Ethics of Teaching* (2006).

Carl Brigham, creator of the SAT and leader of the American Eugenics Society, designed and used intelligence tests to argue that “[t]he decline of American intelligence will be more rapid than the decline of the intelligence of European national groups, owing to the presence here of the negro ... The deterioration of American intelligence is not inevitable, however, if public action can be aroused to prevent it.” As Wayne Au of the University of Washington put it, “the assumptive objectivity of standardized testing was thus used to ‘scientifically’ declare the poor, immigrants, women, and nonwhites in the U.S. as mentally inferior, and to justify educational systems that mainly reproduced extant socioeconomic inequalities.” <https://www.teenvogue.com/story/the-history-of-the-sat-is-mired-in-racism-and-elitism>.

³ “Factors Affecting Bar Passage Among Law Students: The REAL Connection Between Race And Bar Passage,” May 15, 2018, <https://aaattorneynetwork.com/factors-affectingbar-passage-among-law-students-the-realconnection-between-race-and-bar-passage/>.

⁴ Marjorie M. Shultz & Sheldon Zedeck, “Identification, Development, and Validation of Predictors for Successful Lawyering” <https://www.law.berkeley.edu/files/LSACREPORTfinal-12.pdf>; Kyle Rozema “Does the Bar Exam Protect the Public” 2021.

about the bar exam is that it bears little resemblance to actual practice and tends to simply restate the same results already provided by law school grades.⁵ For these reasons and others the WBLTF proposes creating new, experiential pathway to bar licensure that protects the public by improving lawyer skills while reducing the barriers for historically marginalized groups to enter the profession. This proposal would have a substantial positive impact⁶ on the profession with a comparatively small investment because it relies on existing infrastructure in law schools and WSBA.⁷ The following five pieces of this recommendation are outlined in detail below: 1) maintain the bar exam in its current form for those who chose to take it while advancing the cause of improvement to the bar exam; 2) create an experiential pathway to practice for law school graduates; 3) create an experiential pathway to practice for law school students; 4) create an experiential pathway to practice for APR6 clerks; 5) recommend that WSBA research with the goal of implementation assessments that identify strengths and growth areas for lawyers and specific training programs. These proposed alternatives relate only to the bar exam. Participants in each proposal would still be expected to complete all WA licensure requirements other than the bar exam.

1) The Bar Exam

While race-equity and effectiveness concerns regarding the Uniform Bar Exam (UBE) abound, Washington should continue to offer the UBE as a pathway to licensure, and when the National Conference of Bar Examiners (NCBE) releases its Next Gen Exam⁸, which is scheduled for first administration in July 2026, Washington should adopt it.

Providing the UBE as a licensure pathway preserves opportunities for reciprocity and could provide a control sample for later study into the effectiveness of both the bar exam and the proposed alternatives. Information the Task Force has received from the NCBE so far suggests that the Next Gen Exam will address some, though not all, of the race-equity concerns with the current version of the UBE. The Next Gen Exam is better positioned to assess the competencies practitioners are looking for in newly licensed lawyers. The Next Gen Exam will cut back on the number of topics tested, and within the topics, it will cut back on the amount of highly detailed information that graduates will need to memorize. In a departure from the current emphasis on multiple-choice questions, the Next Gen Exam will utilize an integrated question format that includes a range of question formats, including essay, short answer, and multiple-choice

⁵ Lorenzo A. Trujillo, "The Relationship between Law School and the Bar Exam: A Look at Assessment and Student Success," 78 University of Colorado Law Review 69 (2007); Nicholas L. Georgakopoulos, "Bar Passage: GPA and LSAT, not Bar Reviews," draft 2013; Katherine A. Austin, Catherine Martin Christopher & Darby Dickerson, "Will I Pass the Bar Exam?: Predicting Student Success Using LSAT Scores and Law School Performance," 45 Hofstra Law Review 753 (2017).

⁶ In an LSAC commissioned study it was shown that assessments of practical skills were highly effective at predicting effective lawyering. *Supra* fn.4 Schultz.

⁷ See rules and requirements in WA APR6, APR9, and ABA Standards and Rules of Procedure for Approval of Law Schools

⁸ <https://www.ncbex.org/about/nextgen-bar-exam/>

questions on related areas of law. On some topics, the Next Gen Exam will provide legal material to the candidate and ask the candidate to synthesize the information and apply it to a novel fact situation. The Next Gen Exam will assess some of the skills newly licensed lawyers should possess, such as the ability to engage in legal research. And the NCBE has stated that the Next Gen Exam will not be a “speeded” exam, which requires candidates to rapidly move through questions.

These changes will not only make the Next Gen Exam a better tool for assessing candidates’ competency to practice, but the changes will also make the Next Gen Exam a fairer exam than the current UBE. Limiting the number of topics tested, reducing the amount of legal information candidates must memorize, shifting the focus of the exam to an integrated and skills oriented format, and deemphasizing speed of performance, will change the way that candidates prepare for the exam, potentially reducing the post-graduation prep time, allowing candidates who have work or family obligations to meet them and enabling the students to move through the exam in a more thoughtful and less “speeded” manner.

2) Graduate Apprenticeship

The WBLTF recommends the adoption of an apprenticeship program by which law school graduates may become licensed. The program would draw on the tutoring and licensing requirements already codified in APR 6 and APR 9 to allow those who satisfactorily complete a six month program to waive out of the bar exam.

APR6⁹ creates Washington’s law clerk program, by which an individual may gain qualification to sit for the bar exam without attending law school. Applicants must (among other requirements) “be of good moral character and fitness,”¹⁰ be a full-time employee of an approved tutor in a “(i) law office, (ii) legal department, or (iii) court of general, limited, or appellate jurisdiction in Washington State, and complete four years of coursework at a rate of six courses per year. Tutors must be approved by WSBA and must be a member in good standing with no disciplinary sanctions in the last five years and must have practiced for at least ten of the last twelve years with at least two of those years taking place in Washington.

APR 9¹¹ creates Washington’s licensed legal intern program, by which an individual can be authorized to practice law in a limited and supervised capacity prior to obtaining a full license. Applicants must (among other requirements) be a student or graduate in good standing who has completed at least two-thirds of their coursework and who has permission from the Dean of their law school. Supervising attorneys must be active members in good standing who have practiced for at least three years and who have no disciplinary sanctions at all in the last three years and no suspensions or disbarments in the last ten years.

⁹ https://www.courts.wa.gov/court_rules/pdf/APR/GA_APR_06_00_00.pdf

¹⁰ https://www.courts.wa.gov/court_rules/pdf/APR/GA_APR_20_00_00.pdf

¹¹ https://www.courts.wa.gov/court_rules/pdf/APR/GA_APR_09_00_00.pdf

Under this proposal law school graduates who wished to become licensed through an apprenticeship and their supervising tutors would be required to meet the requirements of both APR6 and APR9. This would allow graduates to gain practical skills through the experience of actually practicing for six months under the guidance and supervision of a qualified attorney. Graduates would also be required to complete six months of the APR6 coursework or three courses.

This proposal would give WSBA more control over the admission of its lawyers while reducing the costs to admission and creating a less-biased path to entry. The proposal would simultaneously ensure that licensed lawyers have the practical skills and training needed to practice. Though historically the APR6 law clerk program has struggled to find tutors, this proposal would likely not face the same barriers because it is a shorter program and it would enable law firms to hire recent graduates without the fear of bar study and passage being a barrier to those graduates being productive employees.¹²

3) Law School Experiential Pathway

In addition to the apprenticeship program the WBLTF recommends an experiential pathway to licensure that would allow students to graduate law school ready to practice. This experiential pathway would draw upon existing law school courses as well as APR 9 to ensure that students have both training and experience in practical lawyering skills at graduation. Students who wish to graduate practice ready would be required to complete twelve credits (what does that mean in terms of actual time (likely 3 hours a week)) of experiential learning courses (or equivalent) and complete five hundred hours of supervised work as a “Licensed Legal Intern” or equivalent.

LLM students? Included. Include rules on GPA in a certain set of courses similar to Wisconsin that would ensure LLM students have the requisite skills. Law schools clearly have a strong interest in a viable pathway for LLM students. What will be different if it was denied for LLM and APR 6 students when diploma privilege was mentioned before. 2 types of LLM for bar or for specific practice area. Common Law v. Civil law LLM students. Common law can just sit for the bar without an LLM. How will VISAs impact this program (perhaps \$60K/year minimum). LLM students need to have a way to do it in law school through clerkships.

4) APR6 Apprenticeship

Similar to the graduate apprenticeship program the WBLTF recommends the creation of an apprenticeship pathway whereby law clerks may get licensed without taking the bar exam. This program would be identical to the apprenticeship program for law school graduates.

Add requirements to apprenticeship program to make it more like law school experiential path. Audit law school classes? Some certificate from law schools? Would SU, UW, and G be open to

¹² I want some member survey data about this.

that? Could CLE programs fill that void? APR 6 already take exams, could we just increase the requirements of the program to cover any gaps we feel exist?

Notes from talk with Mary, there isn't the level of oversight from WSBA that she would like to see as a check on the program. She feels like if they aren't going to go to law school they need some baseline to get them there. We talked about increasing work on WSBA to oversee those in the program. Like interviewing lawyers that know them and random audit of clients. If we did that questions would have to be well tailored. You can be a rule 9 in the APR 6 program. So perhaps that makes a difference.

I need the APR6 board to help me answer what's fair?

5) Alternative Assessments

The WBLTF recommends that WSBA with the support of the Supreme Court begins the task of investigating and implementing the alternative assessments that were previously studied by LSAC and found to be predictive of effective lawyers. WSBA could begin by working with the LSAC researchers to offer CLE credit for lawyers to take these assessments. The data from these assessments could be analyzed in conjunction with existing data on lawyer discipline to measure their effectiveness.

6) Reciprocity

Based on the above alternative paths to admission, the WBLTF additionally recommends that the timeline for out-of-state licensed attorneys to be eligible for admission by motion be reduced to one year. For the same reason the WBLTF believes that a six-month post-law-school apprenticeship program is sufficient to qualify a lawyer to practice in WA, the WBLTF believes that actively practicing in another state for one year or more qualifies an attorney to waive out of taking a second bar exam to practice in Washington.

Law Clerk Board Calendar – FY24

Date	Event
October 6, 2023	Regular Full-Day In-Person 9am – 3pm
December 1, 2023	Half-Day Virtual 9am – 12pm
February 2, 2024	Regular Full-Day In-Person 9am – 3pm
April 5, 2024	Half-Day Virtual 9am – 12pm
June 7, 2024	Regular Full-Day In-Person 9am – 3pm
August 2, 2024	Half-Day Virtual 9am – 12pm

Full-day meetings

Board business 9am – 10:30 am

Half-day meetings

Board business 9am – 10:00 am



Outreach and Updates

Program Data as of 3.30.2023
Enrolled: 101 Current Number of Applications: 2 under review Next application review: 3
Updates
APR 11 – Comment period ends April 30 th Volunteer applications open – Application deadline April 21 st
Outreach
March 1 st – Whatcom County Bar Association Lunch Presentation (Emily) Date pending – Okanogan County Bar Association Presentation (Leone) Date pending – Small Town and Rural Practice (STAR) Committee Presentation (Leone)



From: [OFFICE RECEPTIONIST, CLERK](#)
To: [Martinez, Jacquelynn](#)
Subject: FW: APR 11 _ MCLE Re Order No. 25700-A-1494
Date: Wednesday, March 8, 2023 1:14:07 PM

From: Brandon Casey <brandon@spokanelawcenter.com>
Sent: Wednesday, March 8, 2023 12:45 PM
To: OFFICE RECEPTIONIST, CLERK <SUPREME@COURTS.WA.GOV>
Subject: APR 11 _ MCLE Re Order No. 25700-A-1494

External Email Warning! This email has originated from outside of the Washington State Courts Network. Do not click links or open attachments unless you recognize the sender, are expecting the email, and know the content is safe. If a link sends you to a website where you are asked to validate using your Account and Password, **DO NOT DO SO!** Instead, report the incident.

I am currently a mentor to a Rule 6 law clerk. I do not think it is generally known what kind of work a mentor does while mentoring a Rule 6 law clerk. A part of every class we teach, we must go back through the law school approved casebook, spend three hours a week specifically teaching our law clerk, and at the end of the month develop a test that tests the law clerk's knowledge of the issues, rules and analysis from that month's course (i.e.: torts, evidence, civil procedure, etc.). I have both participated in chairing and speaking at CLEs, for which I have received credit because of that participation. I can genuinely say that mentoring a law clerk is far more work and engaging and more work than preparing CLE's for other attorneys. I am requesting that the rule be amended to allow attorneys who mentor clerks, to received CLE credits for the time that put into mentoring.

Brandon R. Casey
Casey Law Offices, P.S.
421 W. Riverside, Suite 1030
Spokane, WA 99201
Phone: (509) 252-9700
Fax: (509) 252-9703

"I see in the near future a crisis approaching that unnerves me and causes me to tremble for the safety of my country... Corporations have been enthroned and an era of corruption in high places will follow, and the money power of the country will endeavor to prolong its reign by working upon the prejudices of the people until all wealth is aggregated in a few hands and the Republic is destroyed."

Abraham Lincoln - Nov 21, 1864

PROTECT THE SEVENTH AMENDMENT: ***"TRIAL BY JURY IN CIVIL CASES. In suits at common law, where the value in controversy shall exceed twenty dollars, the right of trial by jury shall be preserved, and no fact tried by a jury shall be reexamined in any court of the United States, than according to the rules of the common law."***

Attention! Casey Law Offices P.S. does not accept service of any pleadings or documents otherwise

without a signed stipulation by all parties.

From: [OFFICE RECEPTIONIST, CLERK](#)
To: [Martinez, Jacquelynn](#)
Subject: FW: [Suspicious URL] Public Comment: APR 11 Suggested Amendment - Open For Comment
Date: Friday, January 13, 2023 11:23:57 AM
Attachments: [image001.png](#)

From: Chris Williams <chris@cedarlawpllc.com>
Sent: Friday, January 13, 2023 11:17 AM
To: OFFICE RECEPTIONIST, CLERK <SUPREME@COURTS.WA.GOV>
Subject: [Suspicious URL] Public Comment: APR 11 Suggested Amendment - Open For Comment

External Email Warning! This email has originated from outside of the Washington State Courts Network. Do not click links or open attachments unless you recognize the sender, are expecting the email, and know the content is safe. If a link sends you to a website where you are asked to validate using your Account and Password, **DO NOT DO SO!** Instead, report the incident.

I am in full support of this proposal to allow mentors to the APR 6 Law Clerk Program to receive MCLE credits for their work with the participants. It involves a significant amount of time that has clearly benefited my learning as a practitioner. It also recognizes this work and eliminates the redundancy in obtaining CLE credits in other ways, which is also onerous for a busy professional. Thank you.

Chris Williams

Partner - Cedar Law PLLC
Email: chris@cedarlawpllc.com **Website:** cedarlawpllc.com

Address: 113 Cherry Street, PMB 96563, Seattle, WA 98104-2205
(mailing only); 911 E. Pike St, Suite 310 (office)

Office: [206-607-8277](tel:206-607-8277) **Fax:** [206-237-9101](tel:206-237-9101)

Confidentiality Notice: This message is being sent by or on behalf of an attorney. It is intended exclusively for the individual or entity to which it is addressed. This communication may contain information that is proprietary, privileged or confidential or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please (and the law may require this) notify chris@cedarlawpllc.com immediately and delete all copies of the message.

----- Forwarded message -----

From: lawclerks <lawclerks@wsba.org>
Date: Fri, Jan 13, 2023 at 10:40 AM
Subject: APR 11 Suggested Amendment - Open For Comment
To: lawclerks <lawclerks@wsba.org>
Cc: lawclerks <lawclerks@wsba.org>

Good morning,

The [suggested amendment to APR 11](#) is now open for comment and will close April 30th. The suggested amendment would allow tutors in the Law Clerk Program to receive MCLE teaching credit for their "personal supervision" of law clerks. Please let me know if you have any questions about this.

Kindly,



Katherine Skinner (she/her) | Law Clerk Program Lead

Washington State Bar Association | 206.727.8326 | katherines@wsba.org

1325 Fourth Avenue, Suite 600 | Seattle, WA 98101-2539 | www.wsba.org

The WSBA is committed to full access and participation by persons with disabilities. If you have questions about accessibility or require accommodation please contact admissions@wsba.org.

From: [OFFICE RECEPTIONIST, CLERK](#)
To: [Martinez, Jacquelynn](#)
Subject: FW: APR11 MCLE Amendment
Date: Tuesday, January 17, 2023 8:36:27 AM

-----Original Message-----

From: Daniel Hess <dan@hesslawoffice.com>
Sent: Saturday, January 14, 2023 2:15 PM
To: OFFICE RECEPTIONIST, CLERK <SUPREME@COURTS.WA.GOV>
Subject: APR11 MCLE Amendment

External Email Warning! This email has originated from outside of the Washington State Courts Network. Do not click links or open attachments unless you recognize the sender, are expecting the email, and know the content is safe. If a link sends you to a website where you are asked to validate using your Account and Password, DO NOT DO SO! Instead, report the incident.

APR 11 mentors put in many hours each month both studying and teaching all areas of the law. Receiving MCLE hours for this work only makes sense. Dan Hess WSBA #12033 Sent from my iPhone

From: [OFFICE RECEPTIONIST, CLERK](#)
To: [Martinez, Jacquelynn](#)
Subject: FW: Amendment to APR 11 comment
Date: Friday, January 13, 2023 11:22:22 AM

From: Dennis Beemer <dennis@beemer-mumma.com>
Sent: Friday, January 13, 2023 11:01 AM
To: OFFICE RECEPTIONIST, CLERK <SUPREME@COURTS.WA.GOV>
Subject: Amendment to APR 11 comment

External Email Warning! This email has originated from outside of the Washington State Courts Network. Do not click links or open attachments unless you recognize the sender, are expecting the email, and know the content is safe. If a link sends you to a website where you are asked to validate using your Account and Password, **DO NOT DO SO!** Instead, report the incident.

I support the amendment to APR 11 which will provide MCLE credit for APR 6 Law Clerk Supervision/Mentoring. Having been involved in the program for 2 years, I have read every textbook cover to cover. I have prepared for class and lectures, and drafted examination questions. This process has allowed me to both refresh and expand my knowledge of the law, to the benefit of my clients. Participation in the APR 6 program as a Mentor has far exceeded knowledge gained in a standard CLE format. Therefore, I encourage the Court to approve the requested APR 11 amendment. Dennis Beemer 15222