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From: Cindy Stewart <cindykstewart@gmail.com>
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To: OFFICE RECEPTIONIST, CLERK
Subject: Comments on LLLT RPC 7.5: Firm Names and Letterhead

Received
Washington State Supreme Court

OCT 31 2014

Ronald R. Carpenter
Clerk

Re: Comments on **LLLT RPC 7.5: Firm Names and Letterhead**

Dear Justices of the Washington State Supreme Court:

I am currently enrolled in the UW School of Law LLLT Family Law 2014-2015 program. I am very excited to have the opportunity to be a pioneer in this new and exciting endeavor. The success of this program ultimately depends on the ability of the Limited License Legal Technicians to adequately and effectively market themselves to the public. One of the most difficult tasks looming will be to make the public aware of services offered by LLLTs. I believe it would be most helpful to allow a variation of more common, layperson terms in naming the firms and use of terms in trade names. Limitation to the term of "Legal Technician" seems unreasonable.

Many attorneys who have been in practice for years have great difficulty in determining what is or is not acceptable with regard to marketing. Perhaps it could be made clearer for legal practitioners if certain terms were set out as excluded: attorney, lawyer, counselor, and so on. There are currently businesses in the legal arena that implement the term "legal services." For example, ABC Legal Services, Inc. (formerly "Messengers") provides non-lawyer legal services to the public as well as attorneys. I believe it is the intent of this Court that LLLTs will eventually be licensed in several practice areas. A broader approach to marketing and making the public aware of the services offered by LLLTs is most definitely needed. LLLTs will be providing legal services. LLLTs have a duty to communicate that he or she has a limited license to practice law. Scope of practice is required to be (and very well should be) included in fee agreements and other client communication. Not allowing the use of a generic term such as "legal services" in a firm name would undermine the goals of APR 28.

My proposed changes are underlined below.

Proposed change to LLLT RPC 7.5(a)

That LLLT RPC 7.5(a) require that LLLTs in private practice use some form of the following terms:

"Legal Technician,"

"Legal Practitioner", "LLLT", or "Legal Services" in their firm name. If no lawyers are in the firm the following terms

are specifically prohibited: lawyer, attorney, counselor...

In the alternative, because there are a fairly small number of LLLTs in the program, it would not be unreasonable to allow proposed firm/trade names to go through an approval process if the LLLT Board feels that stricter limits need to be in place.

The LLLT Board has done a superb job thus far in implementing this one of a kind program. I am investing a great deal of time and expense toward making my practice as a Limited License Legal Technician a reality. My livelihood will depend on a successful practice. It is my hope that this Court and the LLLT Board will implement my proposed changes, or a form thereof, in order that the general public can better be made aware that more affordable access to legal services will be available to lower income people by utilizing the services of Limited License Legal Technicians.

Consideration of my comments on proposed changes to LLLT RPC 7.5 is appreciated.

Sincerely,

Cindy Stewart