

# BAILEY, DUSKIN, PEIFFLE & CANFIELD

A PROFESSIONAL SERVICE CORPORATION  
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June 22, 2007

The Justices of the Supreme Court  
P.O. Box 40929  
Olympia, Washington 98504

RE: Proposed Change To RPC 1.15A  
*Comment On Recommended Change*

Dear Justices:

Our law firm is strongly in favor of the proposed change to RPC 1.15A. This change will limit annual attorney reporting requirements to only "funds" versus all "property", i.e. original wills, original estate planning documents, original recorded documents, etc.

For the past fifty years, our firm has offered clients safekeeping of these important documents, pursuant to the clients request, at no additional charge. Our files contain thousands of original documents and duplicate original documents. Without this service, our clients might misplace or lose these documents. In many estate planning situations, particularly involving elderly clients, our clients seek our advice and have concerns that their original estate planning documents might be altered or tampered with. Retaining these documents for the client is a valuable service and the annual reporting requirement will either make this service unattractive to lawyers or add to the expense for clients. Neither is in the best interests of the public.

Reviewing the client files accumulated over the past fifty years, notifying each client of each original document and/or returning each original document will be an incredibly burdensome process that will require significant administrative cost and our clients will gain no certain advantage from the process. If required to annually notify clients of each original document we have on file, we would be forced to rescind our complimentary safe-keeping services to our clients due to the administrative cost. Most significantly, should the Court adopt the proposed change to RPC 1.15A, the general obligation to safeguard all client property in our firm's possession will not be affected.

We believe, as provided in the April 2007 notice of the proposed rule change, "the annual accounting requirement is over broad and unduly burdensome...The benefits of periodically providing such information to clients are outweighed by the burdens involved in compliance."

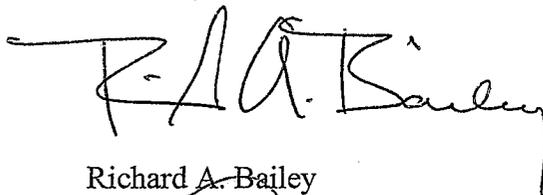
We respectfully request the Court adopt the proposed RPC 1.15A(e) revision.

RECEIVED  
SUPREME COURT  
STATE OF WASHINGTON  
07 JUN 25 AM 8:17  
BY RONALD R. CARPENTER  
CLERK

June 22, 2007  
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Thank you.

Sincerely,

A handwritten signature in black ink that reads "Richard A. Bailey". The signature is written in a cursive style with a long horizontal line extending to the left.

Richard A. Bailey

A handwritten signature in black ink that reads "David E. Duskin". The signature is written in a cursive style with a large, circular initial.

David E. Duskin

A handwritten signature in black ink that reads "Steven J. Peiffle". The signature is written in a cursive style with a large, circular initial.

Steven J. Peiffle

A handwritten signature in black ink that reads "Laura Hoskins". The signature is written in a cursive style with a large, circular initial.

Laura Hoskins