

Faulk, Camilla

From: Kirkland, Kelly [kelly.kirkland@howrey.com]
Sent: Monday, January 14, 2008 3:38 PM
To: Faulk, Camilla
Subject: Comment re Proposed New APR 11 Regulation 104

Ms. Faulk,

I practice law in the Houston office of a multi-national law firm based in Washington D.C. I have been a proud member of the Washington State Bar Association since 1981, although I have not actively practiced in the state for many years.

For years - nay, decades - I have satisfied my MCLE credit requirements by attending CLE seminars put on by the State Bar of Texas, the Houston Bar Association, and (to a much lesser degree) my law firm. All such seminars involve legal skills and topics that would be as relevant to an attorney practicing in, say, Seattle as one practicing here in Houston. I fill out the Form 1's for each seminar after I attend them and submit them to the WSBA for credit. It is a hassle but I don't mind doing it to keep up my Washington State Bar membership. I have never been denied credit for any seminar.

Now it seems that all that is going to end. The proposed amendments make it likely that I will have to give up my membership in the WSBA after all these years. Neither the Texas State Bar nor the Houston Bar Association is going to meet all the new requirements, e.g., register with the WSBA in advance all of its seminars, keep copies of all its attendance records for years, etc. Neither is my law firm going to, e.g., file a Form 1 14 days in advance of its seminars (as well as meet all the other new requirements).

I respectfully suggest that the new amendments leave those of us not based in Washington state no practical way of meeting the new MCLE requirements. That may be the purpose of the new rules. In any event, I urge you to re-read the proposed amendments with a view towards those of us who have to practice law as best we can many miles from the Great Northwest.

Thank you.

(Mr.) Kelly J. Kirkland
WSBA #11876
Houston, Texas

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