



Seattle City Attorney

Peter S. Holmes

April 16, 2013

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

Re: Comments and suggested edits to proposed APR 6 amendments

Dear Clerk:

The Seattle City Attorney's Office is exploring the possibility of tutoring a law clerk under Washington State's Admission to Practice Rule (APR) 6 Law Clerk Program. Our office primarily comprises a criminal and a civil division. The former is our prosecutorial arm and the latter is made up of six departments: torts, land use, government affairs, environmental protection, labor and employment, and contracts/utilities. As our attorneys have exceptional knowledge in diverse practice areas, our office would be an ideal learning environment for a law clerk.

We note that the current proposed amendments to APR 6(b)(7) include an employment waiver. Our office has drafted proposed language to extend the employment waiver to legal departments of governmental agencies. In lieu of employment, the law clerk would be an unpaid intern for an average of 32 hours per week. This arrangement promotes public service, while maintaining the integrity and purpose of the law clerk program as an apprenticeship.

Attached please find our proposed amendments. If you have any questions, please feel free to contact me at (206) 684-8288 or peter.holmes@seattle.gov.

Very truly yours,

A handwritten signature in black ink that reads "Peter S. Holmes".

PETER S. HOLMES
Seattle City Attorney

(b)

(8) Governmental agency law clerk interns. In an effort to promote public service, the Board of Governors may also waive the employment requirement stated in section (a)(3) under the following circumstances:

- (i) When the primary tutor is an employee of, or an appointed or elected official of, the legal department of a governmental agency (hereafter "governmental agency"), the requirement that the primary tutor, or the primary tutor's employer, be the law clerk's employer may be waived.
- (ii) In lieu of paid employment, the law clerk shall intern without pay for an average of 32 hours per week with the governmental agency.
- (iii) The internship must include tasks and duties which contribute to the practical aspects of engaging in the practice of law.
- (iv) Besides the employment requirement, all other APR 6 requirements and Law Clerk Regulations shall apply to governmental agency law clerk interns.

If the governmental agency is unable to teach a particular curriculum subject, a law clerk may request an assistant tutor from outside of the governmental agency to teach that particular subject. An assistant tutor outside of the governmental agency will only be approved if the Board of Governors is satisfied that the governmental agency primary tutor has arranged a relationship with the law clerk's potential assistant tutor consistent with the purposes of the Program. While receiving personal supervision for an average of 3 hours per week from an assistant tutor outside of the governmental agency, the law clerk shall remain an intern at the governmental agency for an average of 32 hours per week.