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April 21, 2022

Sent via Electronic Mail

Erin L. Lennon, Clerk
Washington State Supreme Court
Temple of Justice
P.O. Box 40929
Olympia, WA 98504-0929
Email: supreme@courts.wa.gov

**RE: Order Number 25700-A-1410: Proposed Changes to Admission and Practice Rule 9
Licensed Legal Interns**

Dear Ms. Lennon:

Thank you for the opportunity to comment on the proposed amendments to the Admission and Practice Rule (APR) 9 regarding licensed legal interns. We support the proposal. Currently, only law students who have completed two years of law school may become licensed legal interns, meaning they can practice law under the supervision of a clinical law teacher or attorney. This proposal would allow law students who have completed one year of law school to become licensed legal interns so long as they are enrolled in a clinic and are supervised by a clinical law teacher. Further, it would bring Washington in-line with national legal training practice norms as well as current trends in legal education, which support more practical training.

We support the amendment for two reasons. First, working as a licensed legal intern prepares students for the practice of law, including learning critical lawyering skills which can only be developed through practice. This includes client interaction and court appearances. Clinics prepare students to be lawyers because the cases and clients are no longer hypotheticals in doctrinal courses—they are real and so are the consequences.

The second reason we support this amendment is that law students in clinics and other supervised settings provide meaningful and necessary services to the people of the state, most often to the benefit of diverse communities with limited resources. Clinics are accessible to those unable to afford private counsel and are often clients of color, experiencing poverty or other significant challenges. By allowing more students to engage in clinics, we are also expanding the

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next generation of lawyers' exposure to working with diverse populations and often on some of the most pressing issues society faces including environmental justice, the school-to-prison pipeline, immigration, and worker's rights. Students that have this experience will be better prepared to take on these issues in their careers. Thus, expanding access to becoming a licensed legal intern also expands access to justice.

As with a number of the rule changes under current consideration, we support efforts to make the legal profession more inclusive with the goal of providing justice in its truest sense for all. These proposed amendments provide future lawyers with valuable training and members of our community needed legal services – both of which benefit all Washingtonians.

Thank you for considering our comments.

Sincerely,



BOB FERGUSON
Attorney General

RWF/eg

From: [OFFICE RECEPTIONIST, CLERK](#)
To: [Linford, Tera](#); [Tracy, Mary](#)
Subject: FW: Proposed Rules Published for Comment
Date: Thursday, April 21, 2022 3:06:23 PM
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[No. 2 Code of Judicial Conduct 2.3 Bias Prejudice and Harassment.pdf](#)
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[No. 8 GR 11 Purpose and Scope of Interpreter Commission.pdf](#)
[No. 9 Courts of Limited Jurisdiction Proposed Repeal of Criminal Rule.pdf](#)
[No. 10 APR 9 Licensed Legal Intern.pdf](#)

From: Ganga, Elaine L (ATG) [<mailto:elaine.ganga@atg.wa.gov>]
Sent: Thursday, April 21, 2022 2:21 PM
To: OFFICE RECEPTIONIST, CLERK <SUPREME@COURTS.WA.GOV>
Cc: Mitchell, Kristen (ATG) <kristen.mitchell@atg.wa.gov>
Subject: Proposed Rules Published for Comment

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Ms. Lennon,

Attached are ten letters regarding the various proposed rules published for comment.

Thank you,

Elaine Ganga

Executive Assistant

Office of the Attorney General

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