



April 24, 2021

Honorable Justices of the  
Washington State Supreme Court  
P.O. Box 40929  
Olympia, WA 98504-0929

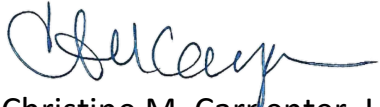
***RE: Public comments regarding sunseting of LLLT license submitted prior to onset of official public comment period; ADDENDUM TO APRIL 17, 2021 LETTER***

Dear Honorable Justices:

I write to submit eight additional public comments, as an addendum to my April 17, 2021 letter, that were submitted to the Court after its letter decision of June 5, 2020 to sunset the LLLT license, and ***before*** the official public comment period opened in January 2021. They are summarized in the table below and are attached as pp. 1 – 16 of this letter.

Date of submission	Name of commenter	Pg #
<b>ATTORNEYS</b>		
6/9/2020	Ann Vetter-Hansen	1
6/22/2020	Nancy Ivarinen	2
7/6/2020	Meredith L. Lehr	5
<b>LLLT STUDENTS AND LLLTs</b>		
6/10/2020	Samantha Bates	6
6/11/2020	Vanessa Shaughnessy	7
<b>LLLT CLIENTS</b>		
6/15/2020	Mary Bickford	10
<b>LEGAL ORGANIZATIONS</b>		
6/16/2020	National Federation of Paralegal Associations	11
<b>WASHINGTON CITIZENS</b>		
6/12/2020	Emma Jepson	15

Sincerely,

A handwritten signature in blue ink, appearing to read "Christine M. Carpenter". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Christine M. Carpenter, LLLT

## Dawson, Seth

---

**From:** Ann Vetter-Hansen <ann@vetterhansen.com>  
**Sent:** Tuesday, June 9, 2020 12:50 PM  
**To:** Carlson, Susan  
**Subject:** LLLT Program Should be a Priority

Dear Justices:

I am writing today as a family law attorney and as someone who has been part of my local community college's Paralegal Program Advisory Committee for years while the LLLT was getting up to speed. Terminating the LLLT program in 2021 is, in effect, terminating it immediately for a vast number of students in the program. Furthermore, this is an absolute blow to access to justice in our state.

I have personally met many students who have actively been working towards a LLLT license. It is unjust to financially penalize students who have typically incurred student loan debt for this unique education and opportunity to serve their communities. These students deserve the opportunity to finish the program that they have committed time and money to.

Whatcom Community College has invested a huge amount of personnel and money into changing their curriculum to become an approved core curriculum provider and accommodate the LLLT program. Many of these students are actively targeting their goals to serve their communities of origin, which are often immigrant populations. The LLLT is one of the most effective ways to deliver access to justice to these communities. The legal aid infrastructure is limited, and private attorneys cannot contribute enough pro bono and low bono hours to meet existing needs.

The LLLT program is still in its infancy and it is short-sighted to terminate it based on an assessment of current cost-to-value. The Washington courts and the WSBA have many larger expenses, and I contend that the LLLT program should be a *priority*.

As a family law attorney, I have seen the work of local LLLTs. It has been excellent, and I am so happy that there are professionals serving a population that I cannot hope to serve sufficiently. Most citizens cannot afford attorneys, and most citizens move through the system so much more easily when they have the assistance of a LLLT. We need vast quantities of LLLTs, not the protection of a professional monopoly that is uneasy about ceding ground and sharing a fraction of their budget.

Ann Vetter-Hansen  
Bellingham, Washington

**From:** [Stephens, Justice Debra L.](#)  
**To:** [Vandervort, Judy](#)  
**Subject:** FW: Note from Nancy Ivarinen re LLLT program  
**Date:** Monday, June 22, 2020 2:13:57 PM

---

Please save this also with LLLT emails. Already went to all justices from RML.

*Chief Justice Debra L. Stephens*

Washington State Supreme Court

PO Box 40929

Olympia, WA 98504

[Debra.Stephens@courts.wa.gov](mailto:Debra.Stephens@courts.wa.gov)

360-357-2050

---

**From:** Montoya-Lewis, Justice Raquel  
**Sent:** Monday, June 22, 2020 2:12 PM  
**To:** SUP DL - JUSTICES <[SUPDL-Justices@courts.wa.gov](mailto:SUPDL-Justices@courts.wa.gov)>  
**Subject:** Fwd: Note from Nancy Ivarinen re LLLT program

Just FYI

Begin forwarded message:

**From:** Nancy Ivarinen <[nancy@ncilegal.com](mailto:nancy@ncilegal.com)>  
**Date:** June 22, 2020 at 2:02:29 PM PDT  
**To:** "Montoya-Lewis, Justice Raquel" <[Raquel.Montoya-Lewis@courts.wa.gov](mailto:Raquel.Montoya-Lewis@courts.wa.gov)>  
**Subject:** Note from Nancy Ivarinen re LLLT program

This is my personal note to you regarding the LLLT license. I had hoped that you and I could discuss the LLLT program before you made any decisions. But distance, time and COVID-19 have probably limited any in-person meetings. If you would like to discuss this issue, please feel free to call my personal cell 360.421.7004 or my office 360.527.3525.

My biggest struggle with the court's decision is how to explain to one of my paralegal students at Whatcom Community College – a single mom, first generation college, Latina, who has to drive to an internet hotspot so she can do her online homework in her car at 9:00 at night after her kids are in bed. She enrolled in the paralegal program because she wants to be a LLLT, run her own business and provide family law services to the ESL Latinx community. I am ashamed of the system and my part in it which so summarily deprives her of her dream.

A letter from the LLLT Board dated 6-19-2020 has been sent to the court. Besides all of the reasons in that letter, there are concerns which are personal to me. As a bit of history, I was on the Practice of Law Board from 2002 until 2010. I was on the Disciplinary Board for three years starting in 2010. Although I was not on the first LLLT Board, I was appointed to the board in 2014. I volunteered hundreds of hours of service on Supreme Court Boards from 2002 to now. In my 30+ years as an attorney, I have worked for legal aid programs and provided many hours of pro bono work. In addition to my private practice, I am an adjunct instructor at Whatcom Community College and coordinate the paralegal studies program.



The origins of the LLLT concept were with the Practice of Law Board which was created by GR 25 in 2001. I can tell you the POLB did not hop right on that issue, much preferring to examine how to address the unauthorized practice of law. The Board was prodded by Justice Alexander and Justice Chambers, who made several appearances at our meetings in Seattle and encouraged us to get going. It took the POLB three years to come to a consensus about the concept of a legal technician. After several years and various incarnations, the proposal went to the Supreme Court where it was tabled for two years until the court issued APR 28 in 2012.

While my colleagues on the POLB were not initially enthusiastic about independent limited license practitioners, after much study, research and many long meetings we came to consensus that someone in the law, like a nurse practitioner in medicine, could provide valuable services at a lower cost to the public.

I was not on the initially appointed LLLT Board, so once APR 28 was implemented I set my sights on getting Whatcom Community College approved to offer the core curriculum. (WCC is not ABA approved and quite frankly I thought the ABA process was too expensive and cumbersome.) When APR 28 changed to allow LLLT Board certification of the core curriculum, I encouraged WCC to support the process. We assembled reams of documents, changed our curriculum (not an easy process), and enlisted faculty and administrators to embrace this wonderful new profession. After several years and with countless hours of work, WCC presented our program for approval to offer the LLLT core curriculum. That process consisted of a review of the paralegal program on paper and also a two-day site visit from a committee consisting of law professors, educators from ABA approved programs, and WSBA personnel. The UW paralegal program went through that same process. We also started the process to have students at Yakima Community College or other interested schools to have their students obtain the LLLT core education through synchronous learning with WCC classes.

I promoted offering the education for the LLLT license to Whatcom Community College. They believed in it. WCC invested untold hours developing LLLT focused curriculum. WCC as an institution promoted the degree. WCC, including other instructors and administrators, engaged in outreach to community groups, high schools, WWU, and gatherings of other professional and educational groups. Now I feel partially responsible for the loss of time and money. The college has responsibilities to their current students which will be difficult to accomplish.

I hope you will reconsider the sunseting of the program until the scheduled study by the National Center for State Courts is finished. At a minimum, please give the current students sufficient time to complete their coursework and other license requirements.

I appreciate and support having your voice on the court. Thank you for your consideration of my comments.

Nancy Ivarinen

--

**Nancy C. Ivarinen, Attorney**

[nancy@ncilegal.com](mailto:nancy@ncilegal.com)

**1504 Broadway St.  
Bellingham, WA 98225**

**360.527.3525**



**From:** [Meredith Lehr](#)  
**To:** [barleaders@wsba.org](mailto:barleaders@wsba.org); [OFFICE RECEPTIONIST, CLERK](#); [Vandervort, Judy](#); [Zeis, Lynda](#); [Yu, Justice Mary](#)  
**Subject:** LLLT Program  
**Date:** Monday, July 6, 2020 11:23:42 AM

---

Dear Leaders of the Bar and Members of the Court:

As a longtime member of the Bar, I am dismayed by and profoundly disagree with the Bar's request for and the state Supreme Court's recent decision to end the LLLT program. I am astounded that there was no request by the Court for hearings or comment to allow the public a chance to weigh in. I am embarrassed as a member of the Bar at this course of action, and the result. Frankly, this smacks of job protection for lawyers at the expense of affordable access to the law for the public.

Please reconsider this decision.

Very truly yours,

Meredith Lehr

Meredith L. Lehr, Esq.  
*Attorney at Law*  
Bar # 11,886  
7785 Westwood Lane  
Mercer Island, WA 98040  
Cell: 206-459-8322

## Dawson, Seth

---

**From:** OFFICE RECEPTIONIST, CLERK  
**Sent:** Wednesday, June 10, 2020 2:45 PM  
**To:** Carlson, Susan; Lennon, Erin  
**Subject:** FW: LLLT Sunset

**From:** Samantha Bates [mailto: ]  
**Sent:** Wednesday, June 10, 2020 2:30 PM  
**To:** OFFICE RECEPTIONIST, CLERK <SUPREME@COURTS.WA.GOV>  
**Subject:** LLLT Sunset

Good afternoon,

My name is Samantha Snodderly. I am a thirty four year old mother of four and I am currently studying at Highline College to become a LLLT. I have also hired and used a LLLT for my personal family law matters for an extended period of time.

I am reaching out begging the Courts to reconsider shutting down the LLLT license. I understand why after five years it may not yet be as successful as anticipated but lets review why:

It is five years old, and it takes nearly four years to become licensed. A little over two years of school followed by a required 3,000 hours, nearly twenty months, of intern before the exam. Only three schools in the entire state offered the required education, recently a fourth joined. It received little to no advertisement to encourage use or entice others to join the team. Plus it is limited to a single area of law.

At the moment there are not many LLLT in practice, but I know there is a significant number of students currently enrolled in varying degrees of completion whose dreams were just crushed. I know mine were. What does that mean for me and my fellow students now? I left my job after fifteen years to pursue this dream to help families and children as well as give my family a better life. The Washington Court System is suffocating under the overwhelming load of demand. People are suffering without help because they can't afford legal representation.

This rash decision was made without the input of LLLTs, students, the public, or the legal community. I am BEGGING the Courts to reconsider their decision of killing this license during its infancy before it has a real chance to help Washingtonians in need.

Highest Respects,  
Samantha Snodderly

## Dawson, Seth

---

**From:** OFFICE RECEPTIONIST, CLERK  
**Sent:** Thursday, June 11, 2020 3:33 PM  
**To:** Carlson, Susan; Lennon, Erin  
**Subject:** FW: Please Reconsider LLLT Decision

**From:** Vanessa [mailto: ]  
**Sent:** Thursday, June 11, 2020 2:27 PM  
**To:** OFFICE RECEPTIONIST, CLERK <SUPREME@COURTS.WA.GOV>  
**Subject:** Please Reconsider LLLT Decision

I'm writing to strongly condemn the Court's intention to "sunset" the LLLT license and ask for your reconsideration. You mention "the small number of interested individuals" in your letter. In fact, there are a huge number of people who would love to do this work, and a vast sea of people who need access to them as a resource.

The primary reason that there are not more licensed LLLTs is that the requirements are both onerous and unpredictable. The previous scope was so constrained that it was debatable whether it was worth going through the program to attain the license, and many people have been waiting to see a more robust balance of benefits to the significant investment required to navigate to licensure. Many have also been, apparently correctly, uncertain about the momentum and ongoing support of the license. Many more are interested in the license, but not the particular practice area of family law, and have been hoping and waiting for the expected practice area expansions before they commit.

So, instead of taking this backwards step and throwing away the years of hard work, consider taking a step towards true Access to Justice: expand the practice areas and simplify the path to licensure. Particularly, this should include reducing the work hour requirement and removal of unnecessary third-party exams. A pathway that is predictably attainable within a 3-year timeframe is reasonable for the scope of a LLLT practice. As it stands now, if everything goes just right, I may be able to secure my license after over 4.5 years of diligent work. Or, just as likely, everything won't go just right before the newly abbreviated timeline, and I will have done all this for nothing.

I have been working towards my Limited License Legal Technician license since 2016 and am currently enrolled in the first class of the practice area curriculum. I specifically pursued the LLLT, because it would afford me a level of independence and autonomy, while allowing me to help people who need it. I have never wanted to be a paralegal. I contacted WSBA as soon as I found out about the license, and enrolled in the core curriculum at Highline College for the following fall quarter. With continuous effort, completing the core requirements took 2 years. It's important to understand that, although the total number of credits is modest, the availability of the specific classes can be irregular, which extends the timeline. I was privileged enough that I could take both evening and day classes. However, if I'd been, for example, a single working parent, who was only able to take classes outside of work hours, it would have taken even longer. It may take 1.5-2.5+ years to complete the core classes, followed by 9 months of the practice area classes, which have been offered erratically, at best. Realistically, that's at least 3 academic years of time spent on necessary coursework.

I was unusually lucky, and got employment directly following my core classes, at the same organization where I completed my internship. However, both the total number of hours required and the necessitated timeframe are hugely problematic. Three thousand hours is at least a year and a half of full-time employment. Even if you are able to get that employment straight out of a paralegal program, which many people can't, you need to get employment with both an attorney willing to sign-off on your hours and a high enough percentage of the necessary substantive legal work to accumulate those hours at a reasonable rate. It is not reasonable to expect that most people will be able to get that kind

of employment directly out of school. People may need to work for 6 months or a year before they're even able to secure the kind of employment that they can use towards licensure. So, then you may have a more realistic necessary timeframe of 3-4 years to accumulate all of your required hours. To be reasonable and more predictable, the requirement should be closer to 1 year of full-time employment in a legal job, or 1,500 total substantive legal work hours.

We are also required to take an initial Core Competency test, which has its own set of detailed requirements for eligibility. It was recently put on pause for several months and then the process was "streamlined," adding additional CLE and work experience requirements for people with my education background—a BA and a paralegal certificate. Just sitting for this particular test alone requires a stack of documents and significant coordination. I would propose to you that people with the amount of education and work experience we are required to have, who are going to be required to pass a bar exam, should not need to jump through this additional, unnecessary, and time-consuming hoop on their way to licensure.

If you start without legal education or experience, this path takes a lot of time, even if some aspects can overlap. If you discontinue the license, at an absolute minimum, you need to give people in the practice area curriculum the same amount of time that they were planning on to complete the requirements before the license is terminated. A bare minimum would be the full 40 months of time to accumulate the hours after passing the LLLT test, or 42 months after completing the practice area curriculum. More desirably, the people who have invested their time, money, and hopes in this path should all be able to navigate it accordance with the established requirements, giving at least 3-5 years, and 1-2 more cohorts of the practice area curriculum, for those people currently working on the core curriculum to navigate the requirements to licensure.

While extending the timeline to reasonably accommodate those impacted by the decision to terminate the license is essential, you should actually not terminate the license at all. What you should do instead is aggressively reform and renew the program, removing the onerous requirements and expanding to the badly needed practice areas of Landlord Tenant, and Debt and Finance. I work in an office that does legal aid, serving people who are facing eviction and those who have past debt that is keeping them from securing stable housing. Legal aid is only able to assist those in the most dire of circumstances—we serve people who are currently homeless, or those with income below 50% of the area AMI. There is a huge pool of people who cannot navigate these issues themselves, do not qualify for free legal aid, and would never, in a million years, afford an attorney. I talk to people every single day who badly need help and have exhausted available resources, and these issues impact the stability and wellbeing of whole households of low-to -moderate income families. The need is there, and it is big.

The problem is that you have been unwilling to make this program robust enough to address that need. The primary concern seems to have always been imposing the most restriction and maintaining the client pool of practicing attorneys. I would propose to you that, essentially:

The LLLT is for people who cannot afford to become attorneys to help people who cannot afford to hire attorneys

Attorneys will lose little if people who could never afford them anyway get the kind of help they need from someone else.

During my 4 years (and counting) of pursuing this license, and continually trying to explain it, I have often been told that I should just go to law school. In some ways that's absolutely true—you go to law school, take the bar, and predictably end up a lawyer, which people understand and respect. What I've committed to has taken longer and leads to much less predictable results. The advantage is purely about limited financial resources. By the time I knew I wanted to go into legal work, I was in my late 30s with three children, all of whom will be going to college in the next decade. I would have been entirely capable of going to law school, but my family could not afford the enormous costs. Given that I wanted to help people of limited means, and taking on huge debt would make that impossible, the LLLT was the ideal solution.

In addition to being a prospective LLLT, my family has often been in need of this approximate level of legal assistance. I will give you three contrasting examples:

1) When I was pregnant with my first child, my husband had not secured a custody arrangement for his then 8-year-old daughter. Our income was not sufficient to care for our family and hire an attorney, although we were not low income enough for legal aid. He got his documents drafted by a father's rights clinic that, in retrospect, was engaged in UPL. When we tried to explain that the bio-mom was a dangerous addict who was doing her children harm, they laughed and said that a father would be lucky to get every other weekend if he tried to contest her primary custody. We were able to get the documents filed before the mother moved out of state, and we spent the next several years doing pro se modifications to eventually get primary custody and supervised visitations for the other parent, using only the original paperwork as a reference. This was a dire situation that desperately needed competent legal help, which we did not have access to.

2) When we were buying our home, it came to light that my husband had an unpaid judgement from an old credit card debt that risked losing our financing and our only chance at home ownership. On the recommendation of our real estate agent, we paid a \$2000 fee for an attorney to negotiate the debt and file a satisfaction of judgment. For this straightforward service, he billed us an additional \$8,000 without notifying us about additional costs. The huge and unpredictable legal cost almost ruined our family's life and took a long time to recover from.

3) At the age of 14, my husband's daughter had been living with us full-time for years, and I wanted to do a step-parent adoption to make her my own. There were no forms online and the facilitator at the court gave me outdated photocopies that were all written up for the opposite gender step-parent. I lovingly crossed out all the "he's" with "she's" on the paperwork, and when we got to court, the judge said: "you really need to get a lawyer." So, we got a lawyer, and paid him \$10,000, because we did need a lawyer, and we were able to pay for one at that time. It was a complicated situation, he was a veteran attorney, and we were grateful to have his necessary representation.

There is a place for all of us. Discontinuing the LLLT hurts real people—real people who have committed to this path, real people who intended to commit to this path once it expanded, and many, many real people who desperately need the kind of assistance a LLLT should be able to provide.

Thank you for your consideration,

Vanessa Shaughnessy

Seattle, WA

## Dawson, Seth

---

**From:** OFFICE RECEPTIONIST, CLERK  
**Sent:** Monday, June 15, 2020 9:30 AM  
**To:** Carlson, Susan; Lennon, Erin  
**Subject:** FW: Please keep LLLT services

-----Original Message-----

From: mamakatt N [mailto: ]  
Sent: Friday, June 12, 2020 8:26 PM  
To: OFFICE RECEPTIONIST, CLERK <SUPREME@COURTS.WA.GOV>  
Subject: Please keep LLLT services

Dear Honorable Justices,

My name is Mary Bickford and I am a client of Christy Carpenter, LLLT. It is my understanding that you wish to end funding and future licensing for LLLT's in the future and let me tell you that based upon my own experiences this would be a grievous mistake.

I was going through a divorce and my ex husband and I agreed that we would do this ourselves to save ourselves money as these proceedings are very costly. I kept my end of the bargain and did not have an attorney until my ex husband showed up to our pre trial conference with an attorney, and I felt intimidated and very much alone. I could not afford an attorney and sought help through a student attorney who referred me to an LLLT list, explaining to me that an LLLT would be my best option. Christy was the first number I called and I will never regret doing so. She did most of the legwork that an attorney would have charged much more than I could ever afford. She was professional and compassionate, she helped me to understand the legal system using terms I could understand, and without her I would either have been 1.-stuck in an untenable and hostile marriage, 2-represented myself against a practiced attorney and lost EVERYTHING including my parents home that was willed to me, or 3-been forced to hire an attorney for the year it took to get my divorce, in which the cost would have ALSO cost me my parents home and left me with nothing at all. Because of the lower cost to get my divorce I only needed an attorney for the final hearing, and while the cost was extremely high just for that, it could have been disastrous without Christy.

There are more of us out there who need out of bad marriages but don't get out due to the costs, and while there is "legal aid" available to lower income people, it is insufficient and there is no representation, it is merely tidbits of advice and one is still left floundering on their own.

The cost of this program is a mere 1% to the Bar Association, and I would ask you if 1% is really so much considering the alternative. Justice and representation should be available to everyone despite their financial standing. One has to wonder what the statistics of domestic violence would be if affordable legal help was unavailable?

I implore you to reconsider ending the LLLT program, and, truth be told, you should be encouraging MORE people to enter into this field, and more funding be made available. Representation should not only be exclusive to the wealthy.

Respectfully,  
Mary Bickford

Sent from my iPhone





June 16, 2020

**VIA EMAIL**

The Honorable Debra L. Stevens  
Chief Justice  
Supreme Court of Washington State  
415 – 12<sup>th</sup> Avenue SW  
Olympia, WA 98504

Re: NFPA Position Statement in Opposition to Washington State Supreme Court  
Sunsetting Limited License Legal Technician (LLLT) Program

Dear Chief Justice Stevens:

The National Federation of Paralegal Associations, Inc. (NFPA), a professional organization founded in 1974 as the first national paralegal association, is an issues-driven, policy-oriented professional association directed by its membership, comprised of nearly 50 paralegal associations and representing approximately 8,000 individual members. NFPA promotes a global presence for the paralegal profession and leadership in the legal community. Its core purpose is to advance the paralegal profession.

**Sunsetting LLLT Program.**

NFPA was disappointed to learn recently that the Washington State Supreme Court had voted to “sunset” the Limited License Legal Technician (“LLLT”) Program. NFPA is a strong advocate of the regulation of paralegals to expand access to justice, and it is our opinion that the State of Washington Supreme Court’s action to sunset the LLLT program takes a step backwards in the provision of quality affordable legal services to those who need them. We strongly urge you to reconsider.

**NFPA’s Contributions to the LLLT.**

In 2005, when the Washington State Bar Association Practice of Law Board (POLB) was beginning to explore the idea of a limited license for non-lawyers, NFPA provided input regarding its preferred qualifications for limited licensing, including

400 South 4th Street  
Suite 754e  
Minneapolis, MN  
55415  
  
info@paralegals.org  
www.paralegals.org

post-secondary education standards, continuing education requirements, attestation by a supervising attorney of experience and work history, and character and fitness standards. At that time NFPA believed, and still does, that paralegals providing services directly to the public must meet stringent education and experience requirements. NFPA believes that protection of the public is of utmost importance to the delivery of legal services to underserved populations. In addition, NFPA participated in “town hall” style meetings sponsored by the POLB to provide input and support to the idea of a limited license. In 2006, NFPA provided input to the POLB request for pilot project ideas for potential non-lawyer practice areas, scope of practice, and licensing requirements.

More recently, when the LLLT Board was developing educational standards for the core/basic learning requirements, it chose NFPA’s Paralegal CORE Competency Exam® (PCCE®) as the standard to demonstrate preparation for entry into the profession. Utilizing the PCCE® as a standardized test for those in the LLLT program served a dual purpose. First, it saved the Washington State Bar Association (WSBA) thousands of dollars in costs to develop and administer an exam that would test core educational knowledge. Second, those that had already taken the PCCE® would start their LLLT careers with a professional certification from a nationally-recognized organization.

NFPA has a long-standing commitment to pro bono and access to justice and is the only national paralegal association with a seat on the American Bar Association (ABA) Standing Committee on Pro Bono and Public Service. In this capacity, NFPA partners with local and national pro bono agencies and associations throughout the United States on volunteer opportunities. NFPA has worked tirelessly throughout the years to identify and facilitate paralegal and non-lawyer legal professional opportunities in the interest of advancing access to justice. In addition, our local associations have worked to collaborate and expand on ideas on innovative approaches for paralegals to assist in the ever-growing need for affordable legal services. This very issue was recently addressed by the American Bar Association at their 2020 Midyear Meeting. In fact, on February 27, 2020, the Board of Governors passed ABA Resolution 115 encouraging U.S. jurisdictions to consider innovative approaches to the access to justice crisis.

### **Access to Justice.**

Individuals throughout the United States struggle to afford legal assistance. Legal aid clinics nationwide are overwhelmed and struggle with proper funding, leaving many pro se litigants to face their legal issues without competent affordable legal assistance. The LLLT was created to offer affordable options for legal services, particularly in certain practice areas with high demand. The LLLT program allowed well-trained, experienced, and competent legal professionals to meet the needs of those unable to afford a lawyer. NFPA supported, promoted and highlighted the LLLT program nationally via conferences, webinars and presentations, including the ABA/National Legal Aid and Defender Association (“NLADA”) Equal Justice Conference. Other states and jurisdictions noticed and recognized the importance of developing innovative programs similar to the LLLT to address the shortfall in the growing demand of the access to justice. It was hoped that the LLLT program would be expended to other areas of law to allow LLLTs to continue to serve individuals (in both urban and rural areas).

Instead, the Washington State Supreme Court now seeks to sunset the very program that served as a lifeline for many individuals. Instead of seeking to expand and support this program, both financially and by marketing the LLLT program within the legal profession, the Washington Supreme Court seeks to “close the door” on this program, with no insight or comment, at a crucial time in our country’s history. Civil Legal Needs and Access to Justice surveys have repeatedly indicated a lack of quality, affordable legal services for low to middle income individuals. NFPA has been, and continues to be, committed to increasing the availability of affordable, quality legal services through the expansion of paralegal roles and responsibilities into the “non-traditional” realm. Having paralegals qualified through education and training available to provide limited legal services directly to the public would facilitate improved access to the legal system.

NFPA strongly encourages the Washington State Supreme Court to reconsider its decision. We cannot stand by and allow the significant access to justice gap to grow even larger. Now is certainly not the time to dismantle the LLLT program; rather, we extend our hand to Washington State to collaborate with the lawyers, local and state bar associations, legal aid providers and the judiciary to not only sustain the LLLT program, but to grow the volume of LLLTs and expand the program to encompass other practice areas. By working together to sustain this program, we believe LLLTs can address and assist with the unmet legal needs of the public in order to narrow the access to justice gap with affordable legal services.

In closing, the time for leadership is now. There is substantially more support for the LLLT than there is opposition, and a significant amount of time and money have been spent and resources allocated to establish this program. The LLLT program is a testament of the outstanding leadership from those who developed the LLLT, creating an innovative framework for offering limited scope legal services for the unmet needs of Washingtonians, and their example has been an inspiration to multiple states for exploring their own programs.

NFPA stands in support of continuing the fight for providing equal access to justice.

Sincerely,

NFPA - The Leader of the Paralegal Profession™

A handwritten signature in black ink that reads "Nita Serrano". The signature is fluid and cursive, with the first name "Nita" and last name "Serrano" clearly distinguishable.

Nita Serrano, RP®, FRP, AACP

NFPA President

[President@paralegals.org](mailto:President@paralegals.org)

Chief Justice Stevens

June 16, 2020

Page 4



Lori J. Boris, RP®, MnCP

NFPA Vice President & Director of Positions and Issues

[VPPI@paralegals.org](mailto:VPPI@paralegals.org)



Brenda Cothary

NFPA Region I Director



Christine Flynn

NFPA Pro Bono Coordinator

NFPA/ABA Liaison- Standing Committee on Pro Bono & Public Service



Cynthia Bynum, MBA

NFPA Regulation Coordinator

NFPA Diversity, Inclusion & Equity Committee Member

## Dawson, Seth

---

**From:** OFFICE RECEPTIONIST, CLERK  
**Sent:** Friday, June 12, 2020 4:07 PM  
**To:** Carlson, Susan  
**Subject:** FW: LLLT Termination Decision

**From:** Emma Jepson [mailto: ]  
**Sent:** Friday, June 12, 2020 3:43 PM  
**To:** OFFICE RECEPTIONIST, CLERK <SUPREME@COURTS.WA.GOV>  
**Subject:** LLLT Termination Decision

To the Honorable Justices of the Supreme Court and To Whom it May Concern:

I write with great disappointment after learning of the recent Supreme Court decision to sunset the LLLT licensure. I had the privilege to work at one of the most robust volunteer lawyer programs in Washington state, Whatcom County's LAW Advocates, in some capacity from 2011 to 2016, including as the Programs Manager. Access to justice was, of course, at the root of our mission. Beyond the daily work of providing free civil legal aid, at LAW Advocates I was proud to facilitate focus groups with our clients as part of the the family law plain language forms overhaul process, and was hopeful and optimistic when the LLLT licensure finally got off the ground in our state. As someone working on the front lines of the access to justice efforts in our state at the time, this development was such an obvious step in the right direction toward increasing access to justice. I even considered pursuing the licensure myself, but at the time the local community college was not affiliated with the ABA, and therefore not eligible to offer the required LLLT curriculum.

I now work as a legal assistant in a law office in Bellingham. I am beyond proud to work in an office with one of the first licensed LLLTs. I am constantly in awe of the exceptional level of service she provides to her clients, and I echo the sentiments of appreciation and gratitude I have heard from our local judiciary after having her well-prepared clients come before them.

I am baffled by the decision to sunset the program and find it to be a giant step backward for access to justice in our state. I cannot fathom any possible good outcome from the decision to sunset the program.

Without getting into the rationale for this decision, or the toxic forces that have been at work to destroy the LLLT licensure since its inception, my plea to the Supreme Court is to reverse the decision. Short of that action, at the very least, I implore the Court to revise the proposed timeline for licensing for students who are currently in the LLLT pipeline. The proposed timeline is arbitrary and would be a tragic and irresponsible waste of resources for our state. As a legal assistant, I am well aware it is near impossible to achieve hour-for-hour substantive legal work within a full-time work week. I request the timeline be revised in accordance with APR 28 and consistent with discontinuation policies of the SBCTC, allowing 3 years plus 40 months for students currently in the pipeline to complete their licensure, so they may move forward in their efforts to increase access to justice in Washington state.

Thank you for your consideration.

Respectfully,

Emma Jepson  
Bellingham, WA

**From:** [OFFICE RECEPTIONIST, CLERK](#)  
**To:** [Linford, Tera](#)  
**Subject:** FW: Public comments in opposition to sunseting of LLLT license  
**Date:** Monday, April 26, 2021 8:09:37 AM  
**Attachments:** [2021-04-24 Ltr to Supreme Court with prior public comments re LLLT program.pdf](#)  
[2021-04-24 Ltr to Supreme Court with prior public comments re LLLT program.pdf](#)

---

---

**From:** Christy Carpenter [mailto:[christy@mylllt.com](mailto:christy@mylllt.com)]  
**Sent:** Saturday, April 24, 2021 2:42 PM  
**To:** OFFICE RECEPTIONIST, CLERK <[SUPREME@COURTS.WA.GOV](mailto:SUPREME@COURTS.WA.GOV)>  
**Subject:** Public comments in opposition to sunseting of LLLT license

**External Email Warning!** This email has originated from outside of the Washington State Courts Network. Do not click links or open attachments unless you recognize the sender, are expecting the email, and know the content is safe. If a link sends you to a website where you are asked to validate using your Account and Password, **DO NOT DO SO!** Instead, report the incident.

Good afternoon,

Attached is a letter within which I submit eight public comments to the Supreme Court that were transmitted to the Supreme Court prior to the opening of the official public comment period in January 2021.

Sincerely,

**Christy Carpenter**  
***Limited License Legal Technician***



2367 Tacoma Ave S, Tacoma, WA 98402  
(253) 457-0967  
[christy@myLLLT.com](mailto:christy@myLLLT.com)  
[www.myLLLT.com](http://www.myLLLT.com)

NOTICE: The information contained in this transmission is **CONFIDENTIAL** and may also be protected by LLLT/CLIENT PRIVILEGE. The information is intended only for the use of the individual or entity to whom it is addressed. If you are not the intended recipient, or the employee or agent responsible for delivering it to the intended recipient, you are hereby notified that unauthorized viewing, dissemination, distribution or copying of this transmission is in violation of the Electronic Communications Privacy Act of 1986 (18 U.S.C. § 2700 et seq.) as well as Domestic and International Laws and Treaties. If you have received the communication in error, please immediately notify the office of myLLLT.com by reply email or by telephone at (253) 457-0967, and delete the email from your inbox and from your recycle/trash folder(s).

