



March 27, 2021

VIA EMAIL TO [supreme@courts.wa.gov](mailto:supreme@courts.wa.gov)

**For Publication and Inclusion**

Washington State Supreme Court

Attn: Hon. Charles W. Johnson

Supreme Court Rules Committee Chair

RE: Sunsetting of the Washington State LLLT Program

Justice Johnson:

I've worked in the legal field for more than twenty years. I'm a licensed private investigator and work as a paralegal in a family law firm.

I write in support of the proposed amendments to APR 4, 5, 25.1, 25.2, 25.3, 28, and Appendix 28.

The LLLT program has not successfully addressed the access to justice gap that generated the program. In many cases, the LLLT program has proven to be nothing more than a momentary diversion from traditional legal practice until the point that the LLLT practitioner hands the client back off to established, competent attorneys after over-charging clients for form production.

I've now had direct professional experience with several LLLT practitioners. In each case, my office has had to clean up the mess made by LLLTs, after they completed the anemic requirements for licensure established by the court.

The established licensing requirements allowed LLLTs to offer family law services to clients in crisis without ever having spent one of their requisite practice hours working in that area of practice. This should never have been allowed to happen and has hurt members of our community, who wrongly believed they were working with experienced legal practitioners who understood the particularities of family law practice.

Washington legal clients deserve competent, consistent legal services across licenses. If the court should determine that some version of this program is appropriate in the future, practice hours in family law should be mandated for LLLTs who elect to offer family law services.

11804 SE 317<sup>TH</sup> PL  
Auburn, Washington 98092  
253-266-4415 t  
253-409-2485 f  
[lew@southkingcountypa.com](mailto:lew@southkingcountypa.com)

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Traditional law firms have been leveraging paralegal participation in case management to reduce costs to clients for years. Many LLLT practitioners finding they could not successfully market their licenses directly to the public have connected with established legal practices as the preferred method to offer their services. Many LLLTs who loudly assert the necessity of maintaining their independence, claiming access to justice will be harmed without this program's existence, have already coupled with attorneys.

Those in need of legal counsel should be more than a commodity to leverage. The creation of the LLLT license, while failing to address access to justice gaps in any meaningful way, has certainly created another opportunity through this license to drain the pocketbooks of those needing help. We already have enough of that in our profession.

Very truly yours,

A handwritten signature in purple ink, consisting of a large, stylized 'L' followed by a horizontal line extending to the right.

Lew L. Humiston, IV

Cc: file

11804 SE 317<sup>TH</sup> PL  
Auburn, Washington 98092  
253-266-4415 t  
253-409-2485 f  
lew@southkingcountypa.com

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Attached, please find my comments for inclusion in the public comments related to the sunseting of the LLLT program.

Lewis L. Humiston, IV  
Private Investigator License: 4025  
253-266-4415 t  
253-409-2485 f  
[www.southkingcountypi.com](http://www.southkingcountypi.com)

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