



# Superior Court Judges' Association

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April 15, 2024

Honorable Charles W. Johnson, Chair

Honorable Mary I. Yu, Chair

Supreme Court Rules Committee

c/o Clerk of the Supreme Court

Temple of Justice

P.O. Box 40929

Olympia, WA 98504-0929

Dear Justice Johnson and Justice Yu:

Re: Suggested Changes to APR 11

The Superior Court Judges' Association's (SCJA) Equality and Fairness Committee reviewed the proposed changes to Admission and Practice Rule (APR) 11. This proposed rule change would require licensed legal professionals to earn legal education credits in the subjects of mental health and technology security each reporting period, among other technical changes.

In section (f)(10), mental health is defined to include substance use, addictive behaviors, and work-life balance, among other things that we more traditionally associate with mental health like anxiety disorders, depression, etc. While the SCJA takes no position on the merits of the proposed changes, we would like to express a concern that defining "mental health" this broadly could offend or marginalize people who have diagnosed mental health disorders. Defining this requirement simply as "health" may better encompass all of the important subjects referenced without unintentionally creating offense.

Thank you for consideration of our comments.

Sincerely,

A handwritten signature in blue ink that reads "Samuel S. Chung".

Samuel Chung, President  
Superior Court Judges' Association

cc: SCJA Board of Trustees  
Allison Lee Muller, AOC

**From:** [OFFICE RECEPTIONIST, CLERK](#)  
**To:** [Martinez, Jacquelynn](#)  
**Subject:** FW: SCJA Public Comment Letters  
**Date:** Monday, April 15, 2024 3:36:16 PM  
**Attachments:** [SCJA Public Comment APR 11.pdf](#)  
[SCJA Public Comment GALRs.pdf](#)  
[SCJA Public Comment RAP 18.25.pdf](#)  
[SCJA Public Comment CrR 4.7.pdf](#)  
[SCJA Public Comment CrR 8.3.pdf](#)  
[SCJA Public Comment CR 26.pdf](#)  
[SCJA Public Comment CR 28 CR 30.pdf](#)  
[SCJA Public Comment BJA Remote Proceedings WG Rules.pdf](#)

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**From:** Valdez, Andrea <Andrea.Valdez@courts.wa.gov>  
**Sent:** Monday, April 15, 2024 3:22 PM  
**To:** OFFICE RECEPTIONIST, CLERK <SUPREME@COURTS.WA.GOV>  
**Cc:** 'Chung, Samuel' <Samuel.Chung@kingcounty.gov>; Lee Muller, Allison <Allison.LeeMuller@courts.wa.gov>; Ireland, Shelley <Shelley.Ireland@courts.wa.gov>; Green, Heidi <Heidi.Green@courts.wa.gov>  
**Subject:** SCJA Public Comment Letters

Good afternoon.

Please see the attached comment letters on behalf of the Superior Court Judges' Association. The proposed rules we are commenting at this time are:

- APR 11
- GALR 1, 2, 4, 5, 6, and 7
- RAP 18.25
- CrR 4.7
- CrR 8.3
- CR 26
- CR 28 & 30
- CrR 3.4, CR 1, CR 7, CR 26, CR 30, CR 39, CR 43, CR 45, GR 11.3, and JuCR 11.23 (Remote Proceedings)

Thank you,  
Andrea Valdez, MPA (she/her/hers)  
Senior Policy Analyst  
Superior Court Judges' Association  
Administrative Office of the Courts  
[Andrea.valdez@courts.wa.gov](mailto:Andrea.valdez@courts.wa.gov)