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April 10, 2025

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 Yu:

Re: Proposed Changes to GR 24

The Superior Court Judges' Association's (SCJA) Family and Juvenile Law Committee reviewed the proposed changes to General Rule (GR) 24. This proposed rule change would conform GR 24 to RCW 7.105 to expand the pool of individuals that may provide assistance to those seeking civil protection orders.

In Section (b)(6) of the proposed rule change, the language "when no fee is charged to do so" has been stricken, along with the references to RCW chapters 10.14 and 26.50. While the SCJA takes no position on the update to the statute references, we have a concern about the proposed amendment's elimination of the language pertaining to fees. Removing this language from the rule may encourage a proliferation of poor and unregulated legal practices by unscrupulous actors, and result in individuals paying for services they do not need, are available for free, or provided elsewhere at a discount. Those most likely to be adversely impacted are those individuals with limited English proficiency or of limited means. While sometimes courthouse facilitators charge fees for their assistance, they do not practice law or give legal advice, and GR 24 Section (b)(2) and RCW 7.105 makes this clarification plain.

Thank you for your consideration of our comments.

Sincerely,

Kristin Ferrera, President
Superior Court Judges' Association

cc: SCJA Board of Trustees
Allison Lee Muller, AOC

From: [OFFICE RECEPTIONIST, CLERK](#)
To: [Tracy, Mary](#)
Subject: FW: Court Rule Public Comment Letters
Date: Thursday, April 10, 2025 2:08:55 PM
Attachments: [CR 12 SCJA Public Comment.pdf](#)
[CR 68 SCJA Public Comment.pdf](#)
[Family Law Defense Standards SCJA Public Comment.pdf](#)
[CrR 3.2 SCJA Public Comment.pdf](#)
[CrR 4.1 CrRLJ4.1 CrRLJ 3.2.1 SCJA Public Comment.pdf](#)
[CrR 8.3 SCJA Public Comment.pdf](#)
[GR 24 SCJA Public Comment.pdf](#)
[GR 27 SCJA Public Comment.pdf](#)
[RPC 6.1 SCJA Public Comment.pdf](#)

From: Valdez, Andrea <Andrea.Valdez@courts.wa.gov>
Sent: Thursday, April 10, 2025 11:48 AM
To: OFFICE RECEPTIONIST, CLERK <SUPREME@COURTS.WA.GOV>
Cc: Kristin Ferrera <Kristin.Ferrera@CO.CHELAN.WA.US>; Lee Muller, Allison <Allison.LeeMuller@courts.wa.gov>; Ireland, Shelley <Shelley.Ireland@courts.wa.gov>; Green, Heidi <Heidi.Green@courts.wa.gov>
Subject: Court Rule Public Comment Letters

Good morning,

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

- CR 12
- CR 68
- CrR 3.1/CrRLJ 3.1/JuCR 9.2 (family defense cases)
- CrR 3.2
- CrR 4.1/CrRLJ 4.1/CrRLJ 3.2
- CrR 8.3
- GR 24
- GR 27
- RPC 6.1

Thank you,
Andrea Valdez, MPA (she/her/hers)
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Superior Court Judges' Association
Administrative Office of the Courts
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