

Margaret Gouveia
The State Bar of California
Legal Services Trust Fund
180 Howard Street
San Francisco, CA 94105

RECEIVED

DEC 10 2008

LEGAL SERVICES
TRUST FUND PROGRAM

Sent via facsimile to (415) 538-2529

Re: Proposed Supreme Court Rule authorizing "Eligible Institutions" under Business and Professions Code section 6213(k) – Support

Dear Ms. Gouveia:

I am writing in support of the proposed Supreme Court Rule authorizing "Eligible Institutions" under Business and Professions Code section 6213(k).

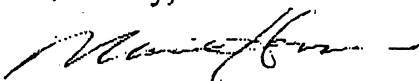
The Legal Services Trust Fund Program has proposed a new Rule of Court to clarify the types of financial institutions that are eligible to hold IOLTA accounts. Currently, B&P Code § 6213(k) defines "eligible institution" as a "bank or any other type of financial institution authorized by the Supreme Court." The Code does not explicitly authorize any financial institution except banks to hold IOLTA accounts. Moreover, it does not require financial institutions that hold IOLTA accounts to carry federal deposit insurance.

Before IOLTA comparability was enacted, other financial institutions besides banks were qualified to hold IOLTA accounts. The new proposed Rule will clarify that financial institutions such as savings & loans, savings banks, and credit unions remain eligible to hold IOLTA accounts.

In addition, the new proposed Rule will require that all IOLTA accounts be held at a financial institution that carries federal insurance for its deposit accounts. The new Rule will also refer to "interest or dividends," to reflect the fact that cash-management overnight "sweep" accounts earn dividends rather than interest.

These proposed changes to the Code will help protect and enhance the IOLTA Program, which provides essential funding for legal services programs. Therefore, I support the adoption of the proposed Rule.

Sincerely,



Maria Herrera



California's protection and advocacy system

JAN 112
Interest on Lawyers' Trust Accounts (IOLTA) Proposed Rule of Court
and/or Legislative Amendment to IOLTA Statute – Return following
Public Comment on Proposed Rule of Court

ADMINISTRATION
Jan 112 Supplement A-1, Public Comment Letters
100 Howe Avenue, Suite 185N
Sacramento, CA 95825
Tel: (916) 488-9955
TTY: (800) 719-5798
Fax: (916) 488-2635
www.disabilityrightsca.org

December 17, 2008

RECEIVED

DEC 18 2008

LEGAL SERVICES
TRUST FUND PROGRAM

Margaret Gouveia
The State Bar of California
Legal Services Trust Fund
180 Howard Street
San Francisco, CA 94105

Sent via facsimile to (415) 538-2529

Re: Proposed Supreme Court Rule authorizing "Eligible Institutions"
under Business and Professions Code section 6213(k) – Support

Dear Ms. Gouveia:

Disability Rights California is writing in support of the proposed Supreme Court Rule authorizing "Eligible Institutions" under Business and Professions Code section 6213(k).

Disability Rights California began protecting the rights of Californians with disabilities in 1978. We are a nonprofit agency that works with people with disabilities to protect, advocate for and advance their human and legal rights. We strive to create a barrier free, inclusive society that values diversity and each individual.

The Legal Services Trust Fund Program has proposed a new Rule of Court to clarify the types of financial institutions that are eligible to hold IOLTA accounts. Currently, B&P Code § 6213(k) defines "eligible institution" as a "bank or any other type of financial institution authorized by the Supreme Court." The Code does not explicitly authorize any financial institution except banks to hold IOLTA accounts. Moreover, it does not require

JAN 112
Interest on Lawyers' Trust Accounts (IOLTA) Proposed Rule of Court
and/or Legislative Amendment to IOLTA Statute – Return following
Public Comment on Proposed Rule of Court

Jan 112 Supplement A-1, Public Comment Letters

financial institutions that hold IOLTA accounts to carry federal deposit insurance.

Before IOLTA comparability was enacted, other financial institutions besides banks were qualified to hold IOLTA accounts. The new proposed Rule will clarify that financial institutions such as savings & loans, savings banks, and credit unions remain eligible to hold IOLTA accounts.

In addition, the new proposed Rule will require that all IOLTA accounts be held at a financial institution that carries federal insurance for its deposit accounts. The new Rule will also refer to "interest or dividends," to reflect the fact that cash-management overnight "sweep" accounts earn dividends rather than interest.

These proposed changes to the Code will help protect and enhance the IOLTA Program, which provides essential funding for legal services programs. Therefore, I support the adoption of the proposed Rule.

Sincerely,



Catherine Blakemore
Executive Director

cc: Leslie Alexander, Legal Aid Association of California, via fax to 415-834-0202

RECEIVED

JAN 112

Interest on Lawyers' Trust Accounts (IOLTA) Proposed Rule of Court
and/or Legislative Amendment to IOLTA Statute – Return following

LEGAL SERVICES

TRUST FUND JAN 12 2009 Supplement A-1, Public Comment Letters

"The Unified Voice of Legal Services"



December 19, 2008

Margaret Gouveia
The State Bar of California
Legal Services Trust Fund
180 Howard Street
San Francisco, CA 94105

Re: Proposed Supreme Court Rule authorizing "Eligible Institutions" under Business
and Professions Code section 6213(k) – Support

Dear Ms. Gouveia:

I am writing on behalf of the Legal Aid Association of California (LAAC) and its legal services member organizations in support of the proposed Supreme Court Rule authorizing "Eligible Institutions" under Business and Professions Code section 6213(k).

LAAC is a non-profit organization founded in 1984 for the purpose of ensuring the effective delivery of legal services to low-income people throughout California. LAAC is the statewide membership organization for legal services programs. Our 2008 membership represents over 80 legal services nonprofits, as well as many individual attorneys working at such programs.

Our members provide high-quality legal services to our state's most vulnerable populations. These services to low-income and other underrepresented individuals form an essential safety net in California and often ensure that the programs' clients have access to life's basic necessities, such as food, safe and affordable housing, freedom from violence, health care, employment, economic self-sufficiency, and access to the legal system.

The Legal Services Trust Fund Program has proposed a new Rule of Court to clarify the types of financial institutions that are eligible to hold IOLTA accounts. Currently, B&P Code § 6213(k) defines "eligible institution" as a "bank or any other type of financial institution authorized by the Supreme Court." The Code does not explicitly authorize any financial institution except banks to hold IOLTA accounts. Moreover, it does not require financial institutions that hold IOLTA accounts to carry federal deposit insurance.

47 Kearny Street, Suite 705 | San Francisco, CA 94108 | (415) 834-0100 | (415) 834-0202 (Fax)

www.CALegalAdvocates.org

Before IOLTA comparability was enacted, other financial institutions besides banks were qualified to hold IOLTA accounts. The new proposed Rule will clarify that financial institutions such as savings & loans, savings banks, and credit unions remain eligible to hold IOLTA accounts.

In addition, the new proposed Rule will require that all IOLTA accounts be held at a financial institution that carries federal insurance for its deposit accounts. The new Rule will also refer to “interest or dividends,” to reflect the fact that cash-management overnight “sweep” accounts earn dividends rather than interest.

These proposed changes to the Code will help protect and enhance the IOLTA Program, which provides essential funding for legal services programs. Therefore, LAAC supports the adoption of the proposed Rule.

Sincerely yours,



Leslie Alexander
Staff Attorney & Program Manager



Interest on Lawyers' Trust Accounts (IOLTA) Proposed Rule of Court
and/or Legislative Amendment to IOLTA Statute – Return following
Public Comment Period
December 29, 2008

Jan 112 Supplement A-1, Public Comment Letters

Executive Director
CAROLE SHAUFFER

Staff Attorneys
SUSAN L. BURRELL
ALICE BUSSIÈRE
DEBORAH ESCOBEDO
CORENE KENDRICK
MARIA F. RAMÍU

Paralegal
MAMIE YEE

Administrator
MEHRZAD KHAJENOORI

Administrative Assistant
ROBIN BISHOP

Margaret Gouveia
The State Bar of California
Legal Services Trust Fund
180 Howard Street
San Francisco, CA 94105
Via Facsimile (415) 538-2529

Re: Proposed Supreme Court Rule 9 Defining "Eligible Institution" Pursuant to Bus. & Prof. Code § 6213(k) – Support

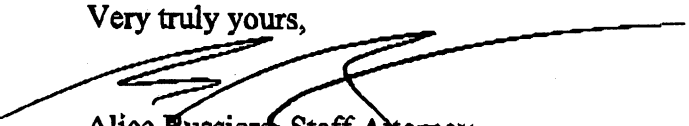
Dear Ms. Gouveia:

We write in support of proposed Supreme Court Rule 9, which will describe financial institutions that are authorized by the Supreme Court to hold IOLTA funds pursuant to Bus. & Prof. Code § 6213(k). The proposed rule will help protect and maximize IOLTA funds which provide essential support for free civil legal assistance for people who are indigent.

The Youth Law Center is a public interest law firm that works to protect children in the foster care and juvenile justice systems from abuse and neglect, and ensure children receive the support and services they need to become healthy and productive adults. As an IOLTA funded support center, the Youth Law Center provides legal training, technical assistance, and advocacy support to Qualified Legal Services Projects (QLSPs) and pro bono attorneys who represent these children and their families.

State law requires attorneys and law firms to establish and maintain IOLTA accounts with eligible institutions. Bus. & Prof. Code § 6212(a). The Code defines "eligible institution" as "a bank or any other type of financial institution authorized by the Supreme Court. Bus. & Prof. Code § 6213(k). The proposed rule will specify that federally insured financial institutions able to pay interest or dividends are authorized by the Supreme Court to hold IOLTA funds. This will allow attorneys to establish IOLTA accounts in financial institutions other than banks, such as savings and loans and credit unions; include accounts that earn dividends as well as those that earn interest; and ensure that authorized institutions carry federal deposit insurance. We encourage you to promulgate this rule.

Very truly yours,



Alice Bussiere, Staff Attorney

cc. Leslie Alexander, Legal Aid Association of California
Via Facsimile 415-834-0202

SAN DIEGO VOLUNTEER LAWYER PROGRAM

625 Broadway, Suite 925, San Diego, CA 92101 • (T) 619.235.5656 • (F) 619.235.5668 • www.sdvlp.org

DANIEL S. SILVERMAN, ESQ.
President, Board of Directors

Jan 112 Supp. B. & P. Code Comment Letters
Executive Director

January 5, 2009

Margaret Gouveia
The State Bar of California
Legal Services Trust Fund
180 Howard Street
San Francisco, CA 94105

RECEIVED

JAN 05 2009

LEGAL SERVICES
TRUST FUND PROGRAM

Sent via facsimile to (415) 538-2529

Re: Proposed Supreme Court Rule authorizing "Eligible Institutions" under Business and Professions Code section 6213(k) – Support

Dear Ms. Gouveia:

I am writing on behalf of the San Diego Volunteer Lawyer Program, Inc. in support of the proposed Supreme Court Rule authorizing "Eligible Institutions" under Business and Professions Code section 6213(k).

SDVLP is a private, not for profit, charitable law firm which provided *pro bono* legal assistance for a wide variety of civil legal issues to indigent residents of San Diego County.

The Legal Services Trust Fund Program has proposed a new Rule of Court to clarify the types of financial institutions that are eligible to hold IOLTA accounts. Currently, B&P Code § 6213(k) defines "eligible institution" as a "bank or any other type of financial institution authorized by the Supreme Court." The Code does not explicitly authorize any financial institution except banks to hold IOLTA accounts. Moreover, it does not require financial institutions that hold IOLTA accounts to carry federal deposit insurance.

Before IOLTA comparability was enacted, other financial institutions besides banks were qualified to hold IOLTA accounts. The new proposed Rule will clarify that financial institutions such as savings & loans, savings banks, and credit unions remain eligible to hold IOLTA accounts.

In addition, the new proposed Rule will require that all IOLTA accounts be held at a financial institution that carries federal insurance for its deposit accounts. The new Rule will also refer to "interest or dividends," to reflect the fact that cash-management overnight "sweep" accounts earn dividends rather than interest.

These proposed changes to the Code will help protect and enhance the IOLTA Program, which provides essential funding for legal services programs. Therefore, I support the adoption of the proposed Rule.

Page 2

JAN 112
Interest on Lawyers' Trust Accounts (IOLTA) Proposed Rule of Court
and/or Legislative Amendment to IOLTA Statute – Return following
Public Comment on Proposed Rule of Court

Jan 112 Supplement A-1, Public Comment Letters

Sincerely,

A handwritten signature in black ink, appearing to read "Amy J. Fitzpatrick", with a stylized flourish at the end.

Amy J. Fitzpatrick, Esq.
Executive Director

cc: Leslie Alexander, Legal Aid Association of California, via fax to 415-834-0202



JAN 112
Interest on Lawyers' Trust Accounts (IOLTA) Proposed Rule of Court
and/or Legislative Amendment to IOLTA Statute Return following
Public Comment on Proposed Rule of Court

JAN 05 2009
Jan 112 Supplement A-1, Public Comment Letters

LEGAL SERVICES
TRUST FUND PROGRAM

Asian Law Alliance

184 East Jackson Street • San Jose, California 95112-5153

(408) 287-9710

Fax (408) 287-0864

E-Mail: SCCALA@pacbell.net

January 5, 2009

Margaret Gouveia
The State Bar of California
Legal Services Trust Fund
180 Howard Street
San Francisco, CA 94105

Sent via facsimile to (415) 538-2529

Re: Proposed Supreme Court Rule authorizing "Eligible Institutions" under Business and Professions Code section 6213(k) – Support

Dear Ms. Gouveia:

I am writing on behalf of the Asian Law Alliance (ALA) in support of the proposed Supreme Court Rule authorizing "Eligible Institutions" under Business and Professions Code section 6213(k).

ALA is a non profit legal services organization located in San Jose, California. ALA has provided legal services in Santa Clara County since 1977.

The Legal Services Trust Fund Program has proposed a new Rule of Court to clarify the types of financial institutions that are eligible to hold IOLTA accounts. Currently, B&P Code § 6213(k) defines "eligible institution" as a "bank or any other type of financial institution authorized by the Supreme Court." The Code does not explicitly authorize any financial institution except banks to hold IOLTA accounts. Moreover, it does not require financial institutions that hold IOLTA accounts to carry federal deposit insurance.

Before IOLTA comparability was enacted, other financial institutions besides banks were qualified to hold IOLTA accounts. The new proposed Rule will clarify that financial institutions such as savings & loans, savings banks, and credit unions remain eligible to hold IOLTA accounts.

In addition, the new proposed Rule will require that all IOLTA accounts be held at a financial institution that carries federal insurance for its deposit accounts. The new Rule will also refer to "interest or dividends," to reflect the fact that cash-management overnight "sweep" accounts earn dividends rather than interest.



United Way Silicon Valley
Partner Agency

Partially funded by CDBG
(County of Santa Clara & City of San Jose)



JAN 112

Interest on Lawyers' Trust Accounts (IOLTA) Proposed Rule of Court

and/or Legislative Amendment to IOLTA Statute - Return following

Public Comment on Proposed Rule of Court

These proposed changes to the Code will help protect and enhance the IOLTA Program, which provides essential funding for legal services programs. Therefore, I support the adoption of the proposed Rule.

Jan 112 Supplement A-1, Public Comment Letters

Sincerely,


Richard Konda

Executive Director

cc: Leslie Alexander, Legal Aid Association of California, via fax to 415-834-0202



LAW OFFICES OF

CONTRA COSTA SENIOR LEGAL SERVICES

A PRIVATE NON-PROFIT CORPORATION SERVING CONTRA COSTA COUNTY RESIDENTS AGE 60 AND OVER SINCE 1976

4006 Macdonald Avenue, Richmond, CA 94805 • Telephone: (510) 374-3712 • Fax (510) 374-3304 • Email: ccsls@jps.net

JAN 112

Proposed Rule of Court
and/or Legislative Amendment to IOLTA Statute – Return following

Public Comment on Proposed Rule of Court

Jan 112 Supplement A-1, Public Comment Letters

RECEIVED

JAN 05 2009

LEGAL SERVICES
TRUST FUND PROGRAM

Laine Lawrence
Executive Director

Robert W. Ross
Directing Attorney

Verna Haas
Attorney

James A. Giblin
Emeritus Attorney

Gerald T. Richards
Emeritus Attorney

Namusa Buchongo
Office Manager

January 5, 2009

Margaret Gouveia
The State Bar of California
Legal Services Trust Fund
180 Howard Street
San Francisco, CA 94105

Sent via facsimile to (415) 538-2529

Re: Proposed Supreme Court Rule authorizing “Eligible Institutions”
under Business and Professions Code section 6213(k) – Support

Dear Ms. Gouveia:

I am writing for Contra Costa Senior Legal Services in support of the proposed Supreme Court Rule authorizing “Eligible Institutions” under Business and Professions Code section 6213(k).

Contra Costa Senior Legal Services is NON-PROFIT ORGANIZATION DEDICATED TO PROVIDING FREE LEGAL CIVIL LEGAL SERVICES TO Contra Costa County residents who are 60 or older.

The Legal Services Trust Fund Program has proposed a new Rule of Court to clarify the types of financial institutions that are eligible to hold IOLTA accounts. Currently, B&P Code § 6213(k) defines “eligible institution” as a “bank or any other type of financial institution authorized by the Supreme Court.” The Code does not explicitly authorize any financial institution except banks to hold IOLTA accounts. Moreover, it does not require financial institutions that hold IOLTA accounts to carry federal deposit insurance.

Before IOLTA comparability was enacted, other financial institutions besides banks were qualified to hold IOLTA accounts. The new proposed Rule will clarify that financial institutions such as savings & loans, savings banks, and credit unions remain eligible to hold IOLTA accounts.

JAN 112
Rules of Court
and/or Legislative Amendment to IOLTA Statute - Return following
Public Comment on Proposed Rule of Court
Jan 12 Supplement A-1 Public Comment Letters

In addition, the new proposed Rule will require that all IOLTA accounts be held at a financial institution that carries federal insurance for its deposit accounts. The new Rule will also refer to "interest or dividends," to reflect the fact that cash-management overnight "sweep" accounts earn dividends rather than interest.

These proposed changes to the Code will help protect and enhance the IOLTA Program, which provides essential funding for legal services programs. Therefore, I support the adoption of the proposed Rule.

Sincerely,



Laine Lawrence
Executive Director

cc: Leslie Alexander, Legal Aid Association of California, via fax to
415-834-0202



Inland Counties Legal Services

Executive Office

1040 Iowa Avenue, Suite 101 / Riverside, CA 92507-2106

(951) 368-2530 / (951) 368-2542 Fax

Interest on Lawyers' Trust Accounts (IOLTA) Proposed Rule of Court
and/or Legislative Amendment to IOLTA Statute - Return following
Public Comment on Proposed Rule of Court

Jan 112 Supplement A-1, Public Comment Letters

RECEIVED
JAN 112
LEGAL SERVICES
TRUST FUND PROGRAM

Housing Law Services Center - Housing Hotline

Eligibility screening and
legal help over the phone.
(951) 368-2570
(888) 455-4257 - Toll Free
(951) 368-2550 - Fax

Branch Offices

1040 Iowa Ave., # 109
Riverside, CA 92507-2106
(951) 368-2555
(951) 320-7500 - Seniors
(888) 245-4257 - Toll Free
(951) 684-1901 - TTY
(951) 368-2550 - Fax

82632-C Highway 111
Indio, CA 92201-5632
(760) 342-1591
(760) 347-5303 - Seniors
(800) 226-4257 - Toll Free
(760) 775-3114 - TTY
(760) 342-9400 - Fax

715 N. Arrowhead Ave., #113
San Bernardino, CA 92401-1150
(909) 884-8615
(909) 888-3889 - Seniors
(800) 677-4257 - Toll Free
(909) 381-0274 - TTY
(909) 884-8281 - Fax

10601 Civic Center Dr., # 260
Rancho Cucamonga, CA 91730-7604
(909) 980-0982
(909) 476-9252 - Seniors
(800) 977-4257 - Toll Free
(909) 476-7875 - TTY
(909) 980-4871 - Fax

14196 Amargosa Rd., # K
Victorville, CA 92392-2429
(760) 241-7073
(760) 241-7072 - Seniors
(888) 805-6455 - Toll Free
(760) 843-9814 - TTY
(760) 241-2111 - Fax

ICLS is a non-profit
501(c)(3) corporation.
Donations are welcome.
IRS Tax ID 95-6124556

Irene C. Morales
Attorney at Law
Executive Director
(951) 368-2540
imorales@icls.org

January 5, 2009

Margaret Gouveia
The State Bar of California
Legal Services Trust Fund
180 Howard Street
San Francisco, CA 94105

Sent via facsimile to (415) 538-2529

Re: Proposed Supreme Court Rule authorizing "Eligible Institutions" under
Business and Professions Code section 6213(k) - Support

Dear Ms. Gouveia:

I am writing Inland Counties Legal Services, Inc. in support of the proposed
Supreme Court Rule authorizing "Eligible Institutions" under Business and
Professions Code section 6213(k).

Inland Counties Legal Services is a non-profit organization providing free civil
legal assistance to indigent and elderly persons in Riverside and San Bernardino
Counties. ICLS has branch offices in Riverside, Indio, San Bernardino, Rancho
Cucamonga and Victorville. Our organization is an IOLTA recipient and uses
IOLTA funds to target services to those segments of our community whose
members are especially underserved, such as senior citizens, victims of domestic
violence, disabled individuals and families in need of advocacy to establish their
right to entitlement programs for cash aid, food stamps and medical insurance.

The Legal Services Trust Fund Program has proposed a new Rule of Court to
clarify the types of financial institutions that are eligible to hold IOLTA accounts.
Currently, B&P Code § 6213(k) defines "eligible institution" as a "bank or any
other type of financial institution authorized by the Supreme Court." The Code
does not explicitly authorize any financial institution except banks to hold IOLTA
accounts. Moreover, it does not require financial institutions that hold IOLTA
accounts to carry federal deposit insurance.

Margaret Gouveia
State Bar of California
Legal Services Trust Fund Program
"Eligible Institutions" Proposed Supreme Court Rule

JAN 112
Interest on Lawyers' Trust Accounts (IOLTA) Proposed Rule of Court
and/or Legislative Amendment to IOLTA Statute – Return following
Public Comment on Proposed Rule of Court
Jan 112 Supplement A-1, Public Comment Letters

Before IOLTA comparability was enacted, other financial institutions besides banks were qualified to hold IOLTA accounts. The new proposed Rule will clarify that financial institutions such as savings & loans, savings banks, and credit unions remain eligible to hold IOLTA accounts.

In addition, the new proposed Rule will require that all IOLTA accounts be held at a financial institution that carries federal insurance for its deposit accounts. The new Rule will also refer to "interest or dividends," to reflect the fact that cash-management overnight "sweep" accounts earn dividends rather than interest.

These proposed changes to the Code will help protect and enhance the IOLTA Program, which provides essential funding for the type of legal services projects described above. Therefore, I support the adoption of the proposed Rule.

Sincerely,



Irene Morales
Executive Director



TEACHING, INTERPRETING AND CHANGING LAW SINCE 1979

1663 Mission Street
Suite 602
San Francisco
California 94103

t 415.255.9499
f 415.255.9792
e ilrc@ilrc.org
w ilrc.org

Advisory Board
John Burton
Nancy Pelosi
Cruz Reynoso

Board of Directors
Cynthia Alvarez
Richard Boswell
Bill Hing
Sallie Kim
Lisa Lindelef
Guadalupe Siordia Ortiz
Richard W. Odgers
Lisa Spiegel
Reg Steer
Donald Ungar
James L. Warren
Allen S. Weiner
Roger Wu
A. Lee Zeigler

Staff
Eric Cohen
Executive Director

Sally Kinoshita
Deputy Director

Bill Hing
General Counsel

Donald Ungar
Of Counsel

Katherine Brady
Angie Juncak
Mark Silverman
Dan Torres
Staff Attorneys

Christopher Godwin
Annual Giving & Event
Manager

Jonathon Huang
IT Manager

Shari Kurita
Assistant Director

Deirdre O'Shea
Foundations Relations Manager

René Pérez
Special Projects Director

Nora Privitera
Special Projects Attorney

Byron Spicer
Finance Assistant

Shellie Stortz
Finance Manager

Sayako Suzuki
Marketing Coordinator

Tim Sheehan
Tim Wilkins
Program Assistants

Margaret Gouveia
The State Bar of California
Legal Services Trust Fund
180 Howard Street
San Francisco, CA 94105

Sent via facsimile to (415) 538-2529

Re: Proposed Supreme Court Rule authorizing "Eligible Institutions" under Business and Professions Code section 6213(k) - Support

Dear Ms. Gouveia:

I am writing on behalf of the Immigrant Legal Resource Center (ILRC) in support of the proposed Supreme Court Rule authorizing "Eligible Institutions" under Business and Professions Code section 6213(k).

For 20 years, the ILRC has been providing various types of technical assistance, such as case consultations, legal publications and resources, and direct training, on immigration law and procedure to qualified legal services projects that are part of the Legal Service Trust Fund Program. Additionally, the ILRC offers technical assistance on immigrant organizing, advocacy, and leadership training projects.

The Legal Services Trust Fund Program has proposed a new Rule of Court to clarify the types of financial institutions that are eligible to hold IOLTA accounts. Currently, B&P Code § 6213(k) defines "eligible institution" as a "bank or any other type of financial institution authorized by the Supreme Court." The Code does not explicitly authorize any financial institution except banks to hold IOLTA accounts. Moreover, it does not require financial institutions that hold IOLTA accounts to carry federal deposit insurance.

Before IOLTA comparability was enacted, other financial institutions besides banks were qualified to hold IOLTA accounts. The new proposed Rule will clarify that financial institutions such as savings & loans, savings banks, and credit unions remain eligible to hold IOLTA accounts.

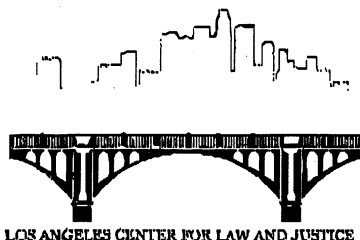
In addition, the new proposed Rule will require that all IOLTA accounts be held at a financial institution that carries federal insurance for its deposit accounts. The new Rule will also refer to "interest or dividends," to reflect the fact that cash-management overnight "sweep" accounts earn dividends rather than interest.

These proposed changes to the Code will help protect and enhance the IOLTA Program, which provides essential funding for legal services programs. Therefore, I support the adoption of the proposed Rule.

Sincerely,

Eric Cohen
Executive Director

cc: Leslie Alexander, Legal Aid Association of California, via fax to 415-834-0202



JAN 112
Interest on Lawyers' Trust Accounts (IOLTA) Proposed Rule of Court
and/or Legislative Amendment to IOLTA Statute - Return following
Public Comment on Proposed Rule of Court

LOS ANGELES CENTER FOR LAW AND JUSTICE

Jan 112 Supplement A-1, Public Comment Letters
1241 South Soto Street, Suite 102, Los Angeles, CA 90023
Phone (323) 980-3500 Fax (323) 980-3510
www.laclj.org

Executive Director

Hellen Y. Hong, Esq.

Board of Directors

Estela de Llanos, Esq. - President
Semptra Energy

Laura Cenao, Esq. - Treasurer
Southern California Edison

Naomi H. Kobayashi, Esq. - Secretary
Capital International, Inc.

Adam J. Bass, Esq.
ACC Capital Holdings

Joel R. Bennett, Esq.
Attorney at Law

Jennifer L. Brockett
Davis, Wright Tremaine LLP

Robyn Crowther
Caldwell Leslie & Proctor, PC

Jorge deNeve, Esq.
O'Melveny & Myers LLP

Michael Farhang, Esq.
Gibson, Dunn & Crutcher LLP

Rodrigo A. Guerra, Jr., Esq.
Skadden, Arps, Slate,
Meagher & Flom LLP

Brian Hershman, Esq.
Jones Day

Damian Martinez, Esq.
Proskauer Rose LLP

Peter Manzo, Esq.
United Way of California

Adam Pines, Esq.
Manatt, Phelps & Phillips, LLP

Nancy Ramirez, Esq.
Mexican American Legal
Defense and Educational Fund

Laura Rodriguez
The Raben Group

Mary Ann Todd, Esq.
Munger, Tollen, & Olson LLP

Jonathan M. Zasloff, Esq.
UCLA School of Law

January 6, 2009

Via facsimile to (415) 538-2529

Margaret Gouveia
The State Bar of California
Legal Services Trust Fund
180 Howard Street
San Francisco, CA 94105

**Re: Proposed Supreme Court Rule authorizing "Eligible Institutions"
under Business and Professions Code section 6213(k) - Support**

Dear Ms. Gouveia:

I am writing on behalf of the Los Angeles Center for Law and Justice ("LACLJ") in support of the proposed Supreme Court Rule authorizing "Eligible Institutions" under Business and Professions Code section 6213(k).

For the past 35 years, LACLJ has provided high quality free legal representation, education and advocacy to low-income residents of East, Northeast and Southeast Los Angeles. Our staff of nine attorneys specialize in family, housing, and government benefits law. We perform these services for our clients to improve their fundamental living conditions and to empower them to achieve self-sufficiency.

The Legal Services Trust Fund Program has proposed a new Rule of Court to clarify the types of financial institutions that are eligible to hold IOLTA accounts. Currently, B&P Code § 6213(k) defines "eligible institution" as a "bank or any other type of financial institution authorized by the Supreme Court." The Code does not explicitly authorize any financial institution except banks to hold IOLTA accounts. Moreover, it does not require financial institutions that hold IOLTA accounts to carry federal deposit insurance.

Before IOLTA comparability was enacted, other financial institutions besides banks were qualified to hold IOLTA accounts. The new proposed Rule will clarify that financial institutions such as savings & loans, savings banks, and credit unions remain eligible to hold IOLTA accounts.

In addition, the new proposed Rule will require that all IOLTA accounts be held at a financial institution that carries federal insurance for its deposit accounts. The new Rule will also refer to "interest or dividends," to reflect the fact that cash-management overnight "sweep" accounts earn dividends rather than interest.

JAN 112
Interest on Lawyers' Trust Accounts (IOLTA) Proposed Rule of Court
and/or Legislative Amendment to IOLTA Statute – Return following
Public Comment on Proposed Rule of Court

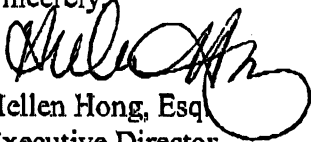
Jan 112 Supplement A-1, Public Comment Letters

Page 2

Letter to Margaret Gouveia

These proposed changes to the Code will help protect and enhance the IOLTA Program, which provides essential funding for legal services programs. Therefore, I support the adoption of the proposed Rule.

Sincerely



Hellen Hong, Esq.
Executive Director

cc: Leslie Alexander, Legal Aid Association of California, via fax to 415-834-0202

JAN 112
Interest on Lawyers' Trust Accounts (IOLTA) Proposed Rule of Court
and/or Legislative Amendment to IOLTA Statute – Return following
Public Comment on Proposed Rule of Court

Jan 112 Supplement A-1, Public Comment Letters



LEGAL AID SOCIETY OF ORANGE COUNTY

2101 North Tustin Avenue, Santa Ana, California 92705
(714) 571-5200 • FAX (714) 571-5270

January 6, 2009

Ms. Margaret Gouveia
The State Bar of California
Legal Services Trust Fund
180 Howard Street
San Francisco, CA 94105

Sent via facsimile to (415) 538-2529

Re: Proposed Supreme Court Rule authorizing "Eligible Institutions" under Business
and Professions Code section 6213(k) – Support

Dear Ms. Gouveia:

I am writing for Legal Aid Society of Orange County in support of the proposed Supreme Court Rule authorizing "Eligible Institutions" under Business and Professions Code section 6213(k).

Founded in 1958 by the Orange County Bar Association, Legal Aid Society of Orange County (LASOC) is a 501(c)(3) non-profit organization whose mission is to provide civil legal services to low-income individuals and seniors and to promote equal access to the justice system through advocacy, legal counseling, innovative self-help services, in-depth legal representation, economic development and community education.

LASOC's client community consists of individuals whose incomes fall below 200% of the federal poverty threshold and those over the age of 60. In 1984, LASOC expanded its service area to include southeast Los Angeles County, where it is known as Community Legal Services.

The Legal Services Trust Fund Program has proposed a new Rule of Court to clarify the types of financial institutions that are eligible to hold IOLTA accounts. Currently, B&P Code § 6213(k) defines "eligible institution" as a "bank or any other type of financial institution authorized by the Supreme Court." The Code does not explicitly authorize any financial institution except banks to hold IOLTA accounts. Moreover, it does not require financial institutions that hold IOLTA accounts to carry federal deposit insurance.

Page 2 of 2
Letter of Support – B&P Code Section 6213(k)
January 6, 2009

JAN 112
Interest on Lawyers' Trust Accounts (IOLTA) Proposed Rule of Court
and/or Legislative Amendment to IOLTA Statute – Return following
Public Comment on Proposed Rule of Court

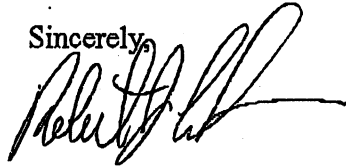
Jan 112 Supplement A-1, Public Comment Letters

Before IOLTA comparability was enacted, other financial institutions besides banks were qualified to hold IOLTA accounts. The new proposed Rule will clarify that financial institutions such as savings & loans, savings banks, and credit unions remain eligible to hold IOLTA accounts.

In addition, the new proposed Rule will require that all IOLTA accounts be held at a financial institution that carries federal insurance for its deposit accounts. The new Rule will also refer to "interest or dividends," to reflect the fact that cash-management overnight "sweep" accounts earn dividends rather than interest.

These proposed changes to the Code will help protect and enhance the IOLTA Program, which provides essential funding for legal services programs. Legal Aid Society of Orange County strongly supports the adoption of the proposed Rule.

Sincerely,



Robert J. Cohen
Executive Director

cc: Leslie Alexander, Legal Aid Association of California, via fax to 415-834-0202