

### Summary of Public Comment Received After Release for Public Comment in November 2008

On November 24, 2008, Rules 3.660 – 3.692 of the Rules of the State Bar as they pertain to the Legal Services Trust Fund Program were re-released for public comment following a prior 45-day public comment period that elicited recommendations for several revisions of those proposed rules. The following written comments all support the redrafted rules and the process that was undertaken to solicit comment and feedback from legal services programs. Without significant variation, the legal aid organizations submitting public comment noted that the proposed changes would make the rules clearer and more readable and efficient. All without limitations supported adoption of the proposed rules. Hard copies of the letters are attached.

Date	Author	Organization	Position	Summary of Comments
Jan. 28, 2009	Richard Konda	<b>Asian Law Alliance</b>	Supports	This legal services program serving seniors, domestic violence victims and others in Santa Clara County supports the revised rules.
Jan. 29, 2009	Devon Lee Lomayesva	<b>California Indian Legal Services</b>	Supports	CILS is an Indian-controlled law firm devoted exclusively to the cause of native American rights - supports the revised rules.
Feb. 2, 2009	Luis Jaramillo	<b>California Rural Legal Assistance, Inc.</b>	Supports	This legal services program, through its 20 field offices distributed statewide, providing legal assistance to both rural and urban populations, including a significant number of farmworkers, supports the revised rules.
Jan. 29, 2009	Chris Schneider	<b>Central California Legal Services</b>	Supports	This legal services program that serves the rural poor in Fresno, Kings, Mariposa, Merced, Tulare, and Tuolumne supports the revised rules.
Feb. 6, 2009	Eric Cohen	<b>Immigrant Legal Resource Center</b>	Supports	This support center, dedicated to protecting and expanding the legal rights of immigrants by offering educational programs and materials, consultations and advocacy support services to organizations providing legal services to immigrants supports the revised rules.
Jan. 14, 2009	Leslie Alexander	<b>Legal Aid Association of California (LAAC)</b>	Supports	<b>LAAC, a statewide membership organization for legal services programs representing over 80 legal services nonprofits, as well as many individual attorneys working at such programs, supports the revised rules.</b>
Jan. 30, 2009	Robert Cohen	<b>Legal Aid Society of Orange County</b>	Supports	This legal services program serving Orange County and sections of Los Angeles County supports the revised rules.
Feb. 3, 2009	Roberta Shouse	<b>Legal Aid Society of San Bernardino</b>	Supports	This pro bono program serving San Bernardino county, including its outlying areas of Chino, Victorville, Joshua Tree and Twenty-nine Palms, supports the revised rules.

Jan. 29, 2009	Gregory Knoll	<b>Legal Aid Society of San Diego</b>	Supports	LASSD has served low-income clients in San Diego County for more than 55 years. It supports the revised rules.
Jan. 28, 2009	Karen Shain	<b>Legal Services for Prisoners with Children</b>	Supports	LSPC is a legal services support center that provides support services to IOLTA service programs. For the past 30 years, has advocated for the human rights and empowerment of the incarcerated parents, children, family members and people at risk for incarceration with a focus on women prisoners and their families. This center supports the revised rules.
Jan. 30, 2009	Neal Dudovitz	<b>Neighborhood Legal Services</b>	Supports	NLS-LA serves all of Los Angeles County targeting its geographically large, ethnically and linguistically diverse communities in the Northern and Eastern Portions of the County—a stretch of over 100 miles. NLS-LA supports the revised rules.
Feb. 2, 2009	Amy Fitzpatrick	<b>San Diego Volunteer Lawyer Program</b>	Supports	SDVLP provides free civil legal services to indigent San Diegans each year, with the assistance of attorneys and other volunteers willing to donate their time at no cost. This pro bono project supports the revised rules.
Jan. 29, 2009	Terrence Lee Hancock	<b>Senior Citizens Legal Services</b>	Supports	SCLS provides free legal services to elderly residents of Santa Cruz and San Benito Counties, prioritizing the rights of the elderly to quality health care, social integration, security in their persons and property and to be free of discrimination on the basis of age or disability. This legal services program supports the revised rules.
Jan. 28, 2009	Pegine Grayson	<b>Western Center on Law &amp; Poverty</b>	Supports	WCLP, a statewide legal services support center, is instrumental in providing advocacy and litigation support, training, and technical assistance to legal services programs in the areas of public benefits, health and housing. It supports the revised rules.

**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 28, 2009

Glory Tabuena  
The State Bar of California  
Legal Services Trust Fund  
180 Howard Street, 5<sup>th</sup> Floor  
San Francisco, CA 94105

*Sent via facsimile to (415) 538-2529*

Re: Proposed revisions to the rules of the Legal Services Trust Fund Program –  
Support

Dear Ms. Tabuena:

I am writing on behalf of the Asian Law Alliance (ALA) in support of the proposed revisions to the rules of the Legal Services Trust Fund Program.

Since 1977, Asian Law Alliance has provided legal services to low income clients residing in Santa Clara County.

The rules-revision process has been inclusive, and the Legal Services Trust Fund Program has provided many opportunities for legal services programs to comment on the proposed revisions. These proposed changes to the rules will make them clearer and more readable and efficient. Therefore, I support the adoption of the proposed revisions.

Sincerely,

Richard Konda  
Executive Director

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



United Way Silicon Valley  
Partner Agency

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





# CALIFORNIA INDIAN LEGAL SERVICES

BISHOP·ESCONDIDO·EUREKA·SACRAMENTO

Principal Office

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www.calindian.org ~ [contactCILS@calindian.org](mailto:contactCILS@calindian.org)

*Devon Lee Lomayesva, Executive Director*

**RECEIVED**

January 29, 2009

FEB - 2 2009

LEGAL SERVICES  
TRUST FUND PROGRAM

*Sent via facsimile to (415) 538-2529*

Glory Tabuena  
The State Bar of California  
Legal Services Trust Fund  
180 Howard Street, 5<sup>th</sup> Floor  
San Francisco, CA 94105

Re: Proposed revisions to the rules of the Legal Services Trust Fund Program –  
Support

Dear Ms. Tabuena:

I am writing on behalf of California Indian Legal Services in support of the proposed revisions to the rules of the Legal Services Trust Fund Program.

California Indian Legal Services (CILS) is an Indian-controlled, not-for-profit law firm devoted exclusively to the cause of Native American rights. Governed by a tribally selected Board of Trustees, CILS today remains a valuable advocate and resource for California Indian communities.

The rules-revision process has been inclusive, and the Legal Services Trust Fund Program has provided many opportunities for legal services programs to comment on the proposed revisions. These proposed changes to the rules will make them clearer and more readable and efficient. Therefore, I support the adoption of the proposed revisions.

Sincerely,

Devon Lee Lomayesva  
Executive Director

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



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FEB - 4 2009

LEGAL SERVICES  
TRUST FUND PROGRAM

February 2, 2009

**Central Office**  
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**José R. Padilla**  
*Executive Director*

**Luis C. Jaramillo**  
*Deputy Director*

**Ralph Santiago Abascal**  
*General Counsel*  
(1934-1997)

**William G. Hoerger**  
**Ilene Jacobs**  
**Michael Meuter**  
**Cynthia Rice**  
*Directors of Litigation, Advocacy,  
and Training*

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Glory Tabuena  
The State Bar of California  
Legal Services Trust Fund  
180 Howard Street, 5<sup>th</sup> Floor  
San Francisco, CA 94105

Re: CRLA Supports Adoption of Proposed Revisions to the Rules of the Legal Services Trust Fund Program

Dear Ms. Tabuena:

California Rural Legal Assistance, Inc. (CRLA) supports the proposed revisions to the rules of the Legal Services Trust Fund Program (LSTFP). Through its 20 field offices distributed statewide, CRLA, an LTFP recipient, has been able to provide legal assistance to both rural and urban populations, including a significant number of farm workers. CRLA offers a full range of legal services within its CRLA Board approved priorities.

As you are well aware, the Legal Services Trust Fund Program rules-revision process has been inclusive, and has provided many opportunities for us and our fellow legal services programs to comment on the proposed revisions. The proposed changes to the rules clarify a number of challenged issues, are more readable and will likely engender a more efficient operation of the program. CRLA supports the adoption of the proposed revisions.

Sincerely,

**Luis C. Jaramillo**  
**Deputy Director**

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

*Sent via facsimile to (415) 538-2529*



January 29, 2009

Sent via facsimile to (415) 538-2529

Glory Tabuena  
The State Bar of California  
Legal Services Trust Fund  
180 Howard Street, 5<sup>th</sup> Floor  
San Francisco, CA 94105

Re: Proposed revisions to the rules of the Legal Services Trust Fund Program – Support

Dear Ms. Tabuena:

I am writing on behalf of Central California Legal Services, Inc. (CCLS) in support of the proposed revisions to the rules of the Legal Services Trust Fund Program.

CCLS is a non-profit law firm. We provide free legal assistance to low income families and individuals in the following counties: Fresno, Kings, Mariposa, Merced, Tulare, and Tuolumne. Our mission: to advance justice and empower people. We do this through education, outreach and zealous representation in civil legal matters.

The rules-revision process has been inclusive, and the Legal Services Trust Fund Program has provided many opportunities for legal services programs to comment on the proposed revisions. These proposed changes to the rules will make them clearer and more readable and efficient. Therefore, I support the adoption of the proposed revisions.

Sincerely,



Chris A. Schneider  
Executive Director

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



FEB - 6 2009

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Suite 602  
San Francisco  
California 94103

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Shellie Stortz  
Finance Manager

Sayako Suzuki  
Marketing Coordinator

Tim Sheehan  
Tim Wilkins  
Program Assistants

Glory Tabuena  
The State Bar of California  
Legal Services Trust Fund  
180 Howard Street, 5<sup>th</sup> Floor  
San Francisco, CA 94105

Sent via facsimile to (415) 538-2522  
LEGAL SERVICES  
TRUST FUND PROGRAM

Re: Proposed revisions to the rules of the Legal Services Trust Fund Program - Support

Dear Ms. Tabuena:

I am writing on behalf of the Immigrant Legal Resource Center in support of the proposed revisions to the rules of the Legal Services Trust Fund Program.

The Immigrant Legal Resource Center (ILRC) is a support center that provides services to legal services programs, volunteer attorneys, legal workers and others. The ILRC is dedicated to protecting and expanding the legal rights of immigrants. The ILRC has offered educational programs, materials, consultations and advocacy support services to organizations providing legal services to immigrants throughout California for almost 30 years.

The rules-revision process has been inclusive, and the Legal Services Trust Fund Program has provided many opportunities for legal services programs to comment on the proposed revisions. These proposed changes to the rules will make them clearer and more readable and efficient. Therefore, I support the adoption of the proposed revisions.

Sincerely,

Eric Cohen  
Executive Director

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

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JAN 15 2009

LEGAL SERVICES  
TRUST FUND PROGRAM

*"The Unified Voice of Legal Services"*



January 14, 2009

Glory Tabuena  
The State Bar of California  
Legal Services Trust Fund Program  
180 Howard Street, 5<sup>th</sup> Floor  
San Francisco, CA 94105

Re: Proposed revisions to the rules of the Legal Services Trust Fund Program –  
Support

Dear Ms. Tabuena:

I am writing on behalf of the Legal Aid Association of California (LAAC) and its legal services member organizations in support of the proposed revisions to the rules of the Legal Services Trust Fund Program.

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.

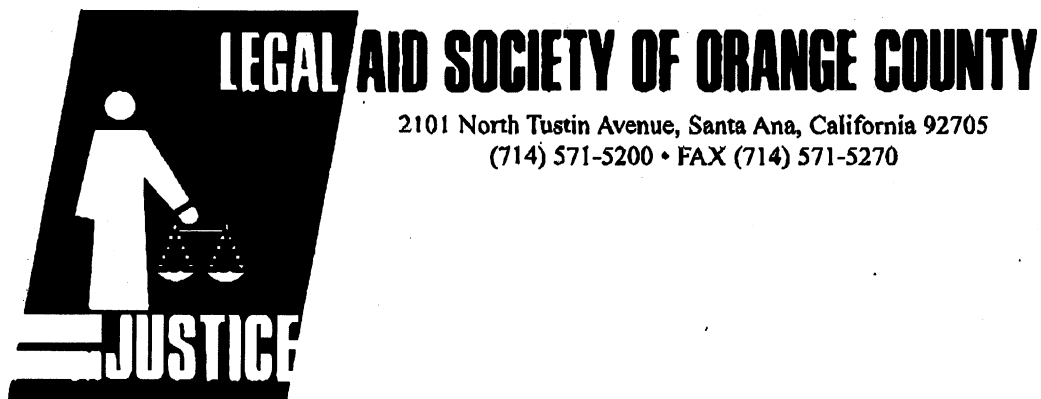
LAAC extends its thanks to the Legal Services Trust Fund Program for the inclusive nature of the rules-revision process and for the many opportunities for LAAC and its member programs to comment on the proposed revisions. These proposed changes to the rules will make them clearer and more readable and efficient. Therefore, LAAC supports the adoption of the proposed revisions.

Sincerely yours,

  
Leslie Alexander  
Staff Attorney & Program Manager

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

[www.CALegalAdvocates.org](http://www.CALegalAdvocates.org)



January 30, 2009

*Sent via facsimile to (415) 538-2529*

Ms. Glory Tabuena  
The State Bar of California  
Legal Services Trust Fund  
180 Howard Street, 5<sup>th</sup> Floor  
San Francisco, CA 94105

Re: Proposed revisions to the rules of the Legal Services Trust Fund Program –  
Support

Dear Ms. Tabuena:

I am writing Legal Aid Society of Orange County (LASOC) in support of the proposed revisions to the rules of the Legal Services Trust Fund Program.

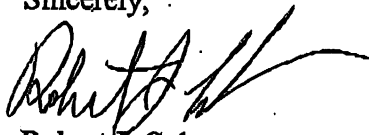
The mission of LASOC is to provide civil legal services to low-income individuals and seniors and to promote equal access to the justice system through advocacy, legal counseling, innovative self-help services, in-depth legal representation, economic development and community education. LASOC's client community consists of individuals whose incomes fall below 200% of the federal poverty threshold (\$42,400 annually for a family of four) and those over the age of 60.

The rules-revision process has been inclusive, and the Legal Services Trust Fund Program has provided many opportunities for legal services programs to comment on the

Letter of Support - IOLTA Rules  
January 30, 2009  
Page 2 of 2

proposed revisions. These proposed changes to the rules will make them clearer and more readable and efficient. Therefore, I support the adoption of the proposed revisions.

Sincerely,



Robert J. Cohen  
Executive Director

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

**LEGAL AID SOCIETY OF SAN BERNARDINO**

354 W. Sixth Street, San Bernardino, CA 92401

Telephone: (909) 889-7328

E-mail: [legalaidofsb@earthlink.net](mailto:legalaidofsb@earthlink.net)

February 3, 2009

Glory Tabuena  
The State Bar of California  
Legal Services Trust Fund  
180 Howard Street, 5<sup>th</sup> Floor  
San Francisco, CA 94105

Sent via facsimile to (415) 538-2529

Re: Proposed revisions to the rules of the Legal Services Trust Fund  
Program - Support

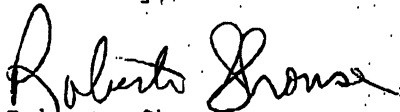
Dear Ms. Tabuena:

I am writing from Legal Aid of San Bernardino in support of the proposed revisions to the rules of the Legal Services Trust Fund Program.

We provide Legal Services here in the San Bernardino Area. We also travel to the outlying areas of Chino, Victorville, Joshua Tree and Twenty nine Palms. We provide advice and brief services primarily in Family Law and Landlord Tenant matters.

The rules-revision process has been inclusive, and the Legal Services Trust Fund Program has provided many opportunities for legal services programs to comment on the proposed revisions. These proposed changes to the rules will make them clearer and more readable and efficient. Therefore, I support the adoption of the proposed revisions.

Sincerely,



Roberta Shouse  
Executive Director

cc: Leslie Alexander, Legal Aid Assoc of CA  
Via Fax (415) 834-0202

**LEGAL AID SOCIETY OF SAN DIEGO, INC.**  
**Office of the Public Attorney**  
**110 South Euclid Avenue**  
**San Diego, California 92114**  
**Telephone: 877.534.2524**  
**Facsimile: 619.263.5697**  
**www.lassd.org**



**DON G. RUSHING, ESQ.**  
**President, Board of Directors**  
**PAMELA M. PARKER, ESQ.**  
**President-elect, Board of Directors**  
**GREGORY E. KNOLL, ESQ.**  
**Executive Director/Chief Counsel**

January 29, 2009

**Sent Via Facsimile to (415) 538-2529**

Ms. Glory Tabuena  
The State Bar of California  
Legal Services Trust Fund  
180 Howard Street, 5<sup>th</sup> Floor  
San Francisco, CA 94105

**RE: PROPOSED REVISIONS TO THE RULES OF THE LEGAL SERVICES TRUST  
FUND PROGRAM – SUPPORT**

Dear Ms. Tabuena:

I am writing on behalf of Legal Aid Society of San Diego, Inc. (LASSD) in support of the proposed revisions to the rules of the Legal Services Trust Fund Program.

Legal Aid Society of San Diego, Inc. is one of California's leading public interest law offices and has been the primary legal aid program servicing San Diego County for more than 55 years. LASSD staff provides legal assistance in the areas of family law and domestic violence, housing, health care, public benefits, immigrant rights and consumer rights.

The rules-revision process has been inclusive, and the Legal Services Trust Fund Program has provided many opportunities for legal services programs to comment on the proposed revisions. These proposed changes to the rules will make them clearer and more readable and efficient. Therefore, I support the adoption of the proposed revisions.

Very truly yours,

A handwritten signature in black ink that reads "Gregory E. Knoll". The signature is written in a cursive, flowing style.

**GREGORY E. KNOLL, ESQ.**  
**Executive Director/Chief Counsel**

cc: Leslie Alexander, Legal Aid Association of California  
Via Facsimile to (415) 834-0202

GEK/maw

LSC

"Partially funded by the City of San Diego Community and Economic Development Department"





January 28, 2009

Glory Tabuena  
The State Bar of California  
Legal Services Trust Fund  
180 Howard Street, 5<sup>th</sup> Floor  
San Francisco, CA 94105

*Sent via facsimile to (415) 538-2529*

Re: Proposed revisions to the rules of the Legal Services Trust Fund Program – Support

Dear Ms. Tabuena:

I am writing Legal Services for Prisoner with Children (LSPC) in support of the proposed revisions to the rules of the Legal Services Trust Fund Program.

LSPC is a legal services support center that provides support services to IOLTA service programs. For the past 30 years, LSPC has advocated for the human rights and empowerment of incarcerated parents, children, family members and people at risk for incarceration. We respond to requests for information, trainings, technical assistance, litigation, community activism and the development of more advocates. Our focus is on women prisoners and their families, and we emphasize that issues of race are central to any discussion of incarceration.

The rules-revision process has been inclusive, and the Legal Services Trust Fund Program has provided many opportunities for legal services programs to comment on the proposed revisions. These proposed changes to the rules will make them clearer and more readable and efficient. Therefore, I support the adoption of the proposed revisions.

Sincerely,

  
Karen Shain  
Co-Director

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

1540 Market St., Suite 490,  
San Francisco, CA 94102.

Phone: (415) 255-7036, Ext 313  
Fax: (415) 552-3150

[www.prisonerswithchildren.org](http://www.prisonerswithchildren.org)  
Karen@prisonerswithchildren.org



**Director's Office**  
Neal S. Dudovitz  
(818) 834-7590  
Ndudovitz@nls-la.org

January 30, 2009

Glory Tabuena  
The State Bar of California  
Legal Services Trust Fund  
180 Howard Street, 5<sup>th</sup> Floor  
San Francisco, CA 94105

*Sent via facsimile to (415) 538-2529*

Re: Proposed revisions to the rules of the Legal Services Trust Fund Program – Support

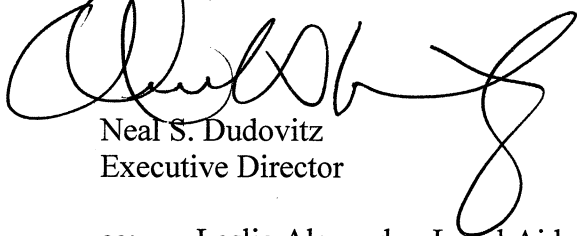
Dear Ms. Tabuena:

Neighborhood Legal Services of Los Angeles (NLS-LA) is in support of the proposed revisions to the rules of the Legal Services Trust Fund Program.

NLS-LA was established in 1965 to provide free legal services to low-income communities in Los Angeles County. NLS-LA is known for its innovative projects and commitment to working with low-income, grassroots community groups. NLS-LA serves all of Los Angeles County targeting its geographically large, ethnically and linguistically diverse communities in the Northern and Eastern portions of the County including the rural Santa Clarita and Antelope Valleys, through the San Fernando Valley, the cities of Pasadena, Burbank, Glendale and the San Gabriel and Pomona Valleys – a stretch of over 100 miles. The targeted communities include a poverty population estimated at 1 million that has grown dramatically over the past decade.

The rules-revision process has been inclusive, and the Legal Services Trust Fund Program has provided many opportunities for legal services programs to comment on the proposed revisions. These proposed changes to the rules will make them clearer and more readable and efficient. Therefore, we support the adoption of the proposed revisions.

Sincerely,



Neal S. Dudovitz  
Executive Director

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

**ADMINISTRATIVE OFFICE**  
1102 East Chevy Chase Drive  
Glendale, CA 91205  
Fax: (818) 291-1790

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El Monte, CA 91731  
Fax (626) 307-3650

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Glendale, CA 91205  
Fax (818) 291-1795

**PACOIMA OFFICE**  
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Pacoima, CA 91331  
Fax (818) 896-6647

**TEL: (800) 433-6251**

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

AMY J. FITZPATRICK, ESQ.  
*Executive Director*

Feb. 2, 2009

Glory Tabuena  
The State Bar of California  
Legal Services Trust Fund  
180 Howard Street, 5<sup>th</sup> Floor  
San Francisco, CA 94105

*Sent via facsimile to (415) 538-2529*

Re: Proposed revisions to the rules of the Legal Services Trust Fund Program – Support

Dear Ms. Tabuena:

I am writing on behalf of the San Diego Volunteer Lawyer Program, Inc. (SDVLP), in support of the proposed revisions to the rules of the Legal Services Trust Fund Program.

SDVLP provides free civil legal services in numerous areas of the law to approximately 7000 indigent San Diegans each year, with the assistance of attorneys and other volunteers willing to donate their time at no cost.

The rules-revision process has been inclusive, and the Legal Services Trust Fund Program has provided many opportunities for legal services programs to comment on the proposed revisions. These proposed changes to the rules will make them clearer and more readable and efficient. Therefore, I support the adoption of the proposed revisions.

Sincerely,

  
Amy J. Fitzpatrick  
Executive Director

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

LAW OFFICES OF  
**SENIOR CITIZENS LEGAL SERVICES** **RECEIVED**  
**SERVICIOS LEGALES PARA PERSONAS DE MAYOR EDAD**

Website: [www.seniorlegal.org](http://www.seniorlegal.org) E-mail: [terryhancock@seniorlegal.org](mailto:terryhancock@seniorlegal.org)

FEB - 2 2009

**Santa Cruz Main Office**  
501 Soquel Avenue, Suite F  
Santa Cruz, CA 95062  
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Fax: 831.426.3345

**Watsonville Office**  
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Watsonville, CA 95077  
Ph: 831.728.4711  
Fax: 831.728.4802

**Hollister Office**  
300 West Street  
Hollister, CA 95021  
Ph: 831.637.5458  
Fax: 831.637.9767

**LEGAL SERVICES  
TRUST FUND PROGRAM**

January 29, 2009

Glory Tabuena  
The State Bar of California, Legal Services Trust Fund  
180 Howard Street, 5<sup>th</sup> Floor  
San Francisco, CA 94105

*Sent via U.S. Mail and facsimile to (415) 538-2529*

**Re: Senior Citizens Legal Services (SCLS)  
Proposed revisions to the rules of Legal Services Trust Fund Program – Support**

Dear Ms. Tabuena:

I am writing on behalf of Senior Citizens Legal Services (SCLS) in support of the proposed revisions to the rules of Legal Services Trust Fund Program.

SCLS provides free legal services to elderly residents of Santa Cruz and San Benito Counties. The highest priority of the program is to defend the right of the elderly to quality health care, social integration, to be secure in their persons and property and to be free of discrimination on the basis of age or disability. Moreover, although the program is prohibited from utilizing a financial means test by federal law, SCLS concentrates its efforts on representing seniors with the greatest social and economic need.

The rules-revision process has been inclusive, and the Legal Services Trust Fund Program has provided many opportunities for legal services programs to comment on the proposed revisions. These proposed changes to the rules will make them clearer and more readable and efficient. Therefore, I support the adoption of the proposed revisions.

Sincerely yours,

*Terry Hancock / by: Lisa Ferguson*

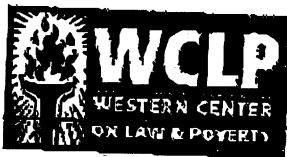
Terrence Lee Hancock

Attorney at Law

[terryhancock@seniorlegal.org](mailto:terryhancock@seniorlegal.org)

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

S:\DAttyAdmin\Fiscal\Programs&Grants\CaliforniaBarAssoc\LSTF-IOLTA\2009-10\Application\Tabuena01.LtrReIOLTArules.wpd



3701 Wilshire Boulevard, Suite 208 Los Angeles, CA 90010-2809  
(213) 487-7211 Fax: (213) 487-0242

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January 28, 2009

Glory Tabuena  
The State Bar of California  
Legal Services Trust Fund  
180 Howard Street, 5<sup>th</sup> Floor  
San Francisco, CA 94105

*Sent via facsimile to (415) 538-2529*

**Re: Proposed revisions to the rules of the Legal Services Trust Fund Program – Support**

Dear Ms. Tabuena:

I write in support of the proposed revisions to the rules of the Legal Services Trust Fund Program.

Western Center on Law & Poverty is an IOLTA-funded statewide legal services support center, which advances and enforces the rights of low-income Californians to the basic necessities of life by working for systemic change.

The rules-revision process has been inclusive, and the Legal Services Trust Fund Program has provided many opportunities for legal services programs to comment on the proposed revisions. Because these proposed changes to the rules will make them clearer and more readable and efficient, we support their adoption.

Sincerely,

Pegine E. Grayson  
Interim Executive Director

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