

**Overview of Comments Received on Proposed New Rule 1-650**

COMMENTATOR (Individual/Organization)	SUBMITTED BY	POSITION (Agree, Disagree, or Agree if Modified)
<a href="#">David Ackerly</a>	David Ackerly	Agree
<a href="#">Bar Association of San Francisco</a>	Carlos Martinez	Agree
<a href="#">Bar Association of San Francisco, Barristers Club</a>	Kiran Jain	Agree
<a href="#">Bar Association of San Francisco, Volunteer Legal Services Program</a>	Tiela Chalmers	Agree
<a href="#">Bar Association of San Francisco, Volunteer Legal Services Program</a>	Christopher F. Emley	Agree
<a href="#">Javier Bastidas</a>	Javier Bastidas	Agree
<a href="#">California Commission on Access to Justice</a>	Hon. Steven K. Austin	Agree if Modified
<a href="#">COPRAC</a>	Suzanne M. Mellard	Agree if Modified
<a href="#">Kelly M. Dermody</a>	Kelly M. Dermody	Agree
<a href="#">Pam Fulmer</a>	Pam Fulmer	Agree
<a href="#">Jennifer Greengold</a>	Jennifer Greengold	Agree
<a href="#">Inner City Law Center</a>	Adam Murray	Agree
<a href="#">Teresa Johnson</a>	Teresa Johnson	Agree
<a href="#">Legal Aid Association of California</a>	Julia R. Wilson	Agree if Modified
<a href="#">Los Angeles County Bar Access to Justice Committee</a>	Toby J. Rothschild	Agree
<a href="#">Los Angeles County Bar Professional Responsibility and Ethics Committee</a>	Joel A. Osman	Agree
<a href="#">James Mink</a>	James Mink	Agree
<a href="#">Multiple Law Firms</a> (O'Melveny & Myers LLP; Bingham McCutchen LLP; Sheppard Mullin Richter & Hampton LLP; Wilson Sonsini Goodrich & Rosati PC; Morrison & Foerster LLP; McDermott Will & Emery LLP; Proskauer Rose LLP; Pillsbury Winthrop Shaw Pittman LLP; Nixon Peabody LLP; K&L Gates LLP; Dewey LeBoeuf LLP; Gibson Dunn & Crutcher LLP; Paul Hastings Janofsky & Walker LLP; Dechert LLP; Baker Botts LLP; DLA Piper US LLP; Baker McKenzie Int'l; Duane Morris LLP; Cooley Godward Kronish LLP; Dykema; Hunton & Williams; Manatt, Phelps & Phillips LLP; and Bryan Cave LLP)	Mark S. Checov and David A. Lash	Agree if Modified
<a href="#">Jenie Oh</a>	Jenie Oh	Agree
<a href="#">Public Counsel</a>	Elizabeth Bluestein	Agree
<a href="#">Jeffrey Ross</a>	Jeffrey Ross	Agree
<a href="#">Tracey Salisbury</a>	Tracey Salisbury	Agree
<a href="#">Mary S. Twomey</a>	Mary S. Twomey	Agree

**From the choices below, we ask that you indicate your position on the Proposed rule. You may submit a comment below or provide an attachment regardless of whether you indicate your position from the choices.**



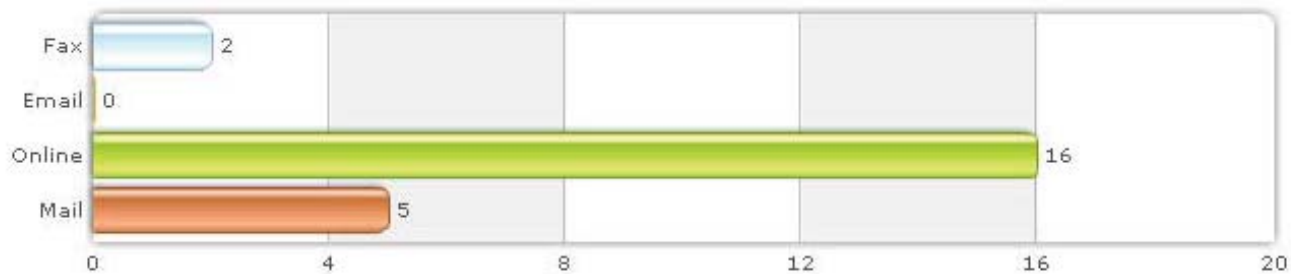
Total Number of Responses for this Item: 23

**Commenting on behalf of an organization**



Total Number of Responses for this Item: 23

**Submitted via:**



Total Number of Responses for this Item: 23



# THE STATE BAR OF CALIFORNIA

## NEW PROPOSED RULE OF PROFESSIONAL CONDUCT 1-650

### Limited Legal Services Programs

#### PUBLIC COMMENT FORM

**INSTRUCTIONS:** This form allows you to submit your comments by entering them into the text box below and/or by uploading files as attachments. *All information submitted is regarded as public record.*

**DEADLINE TO SUBMIT COMMENT IS: APRIL 17, 2009**

## Your Information

<b>Professional Affiliation</b>	<input type="text" value="Directing Attorney, Homeless Veterans Project, Inner C"/>	<b>Commenting on behalf of an organization</b>	<input type="radio"/> Yes <input checked="" type="radio"/> No
<b>Name</b>	<input type="text" value="David Ackerly"/>		
<b>City</b>	<input type="text" value="Los Angeles"/>	<b>State</b>	<input type="text" value="California"/>
<b>Email address</b> (You will receive a copy of your comment submission.)	<input type="text" value="dackerly@innercitylaw.org"/>		

The following documents are available and can be viewed by clicking on the links

[Proposed Rule 1-650 Public Comment Notice](#)

[Proposed Rule 1-650 Agenda Item & Attachment.pdf](#)

[Proposed Rule 1-650 \(clean version & redline comparison to ABA MR 6.5\).pdf](#)

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- AGREE with this proposed Rule  
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Proposed Rule 1-650 will help expand access to justice in California. Many private attorneys are unable to take on full representation for poor clients on a pro bono basis. They could participate in clinics because the time commitment is limited to the length of the clinic, but are blocked by the imputed conflicts rule. Rule 1-650 would allow these attorneys to meet or exceed the State Bar Board of Governors' suggested target of at least 50 hours of pro bono legal services a year. This increase in pro bono participation will result in many more poor clients being able to meet with an attorney and receive counsel and advice on their legal issues.


# Attachments

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You may upload up to **three** attachments commenting on the rule you selected from the drop down box in the previous section. We accept the following file types: text (.txt), Microsoft Word (.doc), WordPerfect (.wpd), Rich Text Format (.rtf) and Adobe Acrobat PDF (.pdf). We do not accept any other file types. **Files must be less than 1 megabyte (1,000,000 bytes) in size.** For help with uploading file attachments, click the  next to **Attachment**.

Attachment 

Attachment 

Attachment 

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# THE STATE BAR OF CALIFORNIA

## NEW PROPOSED RULE OF PROFESSIONAL CONDUCT 1-650

### Limited Legal Services Programs

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## Your Information

Professional Affiliation	<input type="text" value="Bar Association of San Francisco"/>	Commenting on behalf of an organization	<input checked="" type="radio"/> Yes <input type="radio"/> No
Name	<input type="text" value="Carlos Martinez"/>		
City	<input type="text" value="San Francisco"/>	State	<input type="text" value="California"/>
Email address (You will receive a copy of your comment submission.)	<input type="text" value="cmartinez@sfbar.org"/>		

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## NEW PROPOSED RULE OF PROFESSIONAL CONDUCT 1-650

### Limited Legal Services Programs

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<b>Professional Affiliation</b>	<input type="text" value="Bar Association of San Francisco, Barristers Club"/>	<b>Commenting on behalf of an organization</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>Name</b>	<input type="text" value="Kiran Jain"/>		
<b>City</b>	<input type="text" value="Oakland"/>	<b>State</b>	<input type="text" value="California"/>
<b>Email address</b> (You will receive a copy of your comment submission.)	<input type="text" value="kjain@oaklandcityattorney.org"/>		

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I agree with this proposed rule in order to increase access to pro bono legal services.



# THE STATE BAR OF CALIFORNIA

## NEW PROPOSED RULE OF PROFESSIONAL CONDUCT 1-650

### Limited Legal Services Programs

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<b>Professional Affiliation</b> ?	<input type="text" value="Volunteer Legal Services Program of the Bar Association"/>	<b>Commenting on behalf of an organization</b> ?	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>Name</b>	<input type="text" value="Tiela Chalmers"/>		
<b>City</b>	<input type="text" value="San Francisco"/>	<b>State</b>	<input type="text" value="California"/>
<b>Email address</b> (You will receive a copy of your comment submission.)	<input type="text" value="tchalmers@sfbar.org"/>		

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This rule would dramatically improve our ability to deliver legal services to low income communities. One of the most challenging aspects of this economic downturn has been the increase in the demand for legal services (as more people fall into poverty, and people have more legal problems due to foreclosure, eviction, consumer debt collection and employment issues) while at the same time there has been a decrease in the supply of services (due to cuts in funding for legal services). To address this, many of us are turning more and more to clinic models, so that we can serve the volumes of people in an efficient way. But the conflicts situations have made this a challenge, particularly for volunteers from larger firms.


And ironically, we have more volunteers from larger firms now -- with the economic downturn, these lawyers are not as busy, and willing to volunteer. Solo and small firm attorneys, by contrast, while still stalwart volunteers, are really scrambling to keep their heads above water and paid work coming in. So this rule is particularly desperately needed now.


[CONTINUED...SEE ATTACHMENT]

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## ATTACHMENT 5

### **ENTER COMMENTS HERE.**

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And ironically, we have more volunteers from larger firms now -- with the economic downturn, these lawyers are not as busy, and willing to volunteer. Solo and small firm attorneys, by contrast, while still stalwart volunteers, are really scrambling to keep their heads above water and paid work coming in. So this rule is particularly desperately needed now.

Even when this economic downturn is over, however, the rule will be crucial. Not every client needs full scope representation, and clinics are an important way to provide service, to triage those who need further help, and to help a large number of people.

I urge you to adopt the new rule 1-650, and appreciate that you are taking it under consideration. I would be happy to address the matter further if that would be helpful, or to answer any questions.



# THE STATE BAR OF CALIFORNIA

## NEW PROPOSED RULE OF PROFESSIONAL CONDUCT 1-650

### Limited Legal Services Programs

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<b>Professional Affiliation</b>	<input type="text" value="BASF, Volunteer Legal Services Program"/>	<b>Commenting on behalf of an organization</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>Name</b>	<input type="text" value="Christopher F. Emley"/>		
<b>City</b>	<input type="text" value="San Francisco"/>	<b>State</b>	<input type="text" value="California"/>
<b>Email address</b> (You will receive a copy of your comment submission.)	<input type="text" value="cfemley@earthlink.net"/>		

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This would be an extremely helpful change, dispelling lingering doubts held by some of our potential volunteer lawyers. You already know about the significant upsurge in demand for volunteer advice counsel. We meet much of the demand with drop-in clinics. They're easier to staff and oversee. But the current rules regarding potential conflicts do discourage some pools of potential volunteers.

Please adopt the proposed Rule.



# THE STATE BAR OF CALIFORNIA

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## Your Information

Professional Affiliation 	<input type="text"/>	Commenting on behalf of an organization 	<input type="radio"/> Yes <input type="radio"/> No
Name	<input type="text" value="Javier Bastidas"/>		
City	<input type="text" value="San Francisco"/>	State	<input type="text" value="California"/>
Email address (You will receive a copy of your comment submission.)	<input type="text" value="jbastidas@sfbar.org"/>		

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## CALIFORNIA COMMISSION ON ACCESS TO JUSTICE

c/o State Bar of California - 180 Howard Street - San Francisco, CA 94105 - (415) 538-2251- (415) 538-2524/fax

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*Superior Court of Contra Costa County  
Pittsburg*

KENNETH W. BABCOCK  
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*Public Law Center  
Santa Ana*

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Riverside*

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ERIC WAYNE WRIGHT  
*Santa Clara University School of Law  
Santa Clara*

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MARY LAVERY FLYNN  
*Director, Legal Services Outreach  
State Bar of California  
San Francisco*

April 14, 2009

Audrey Hollins  
Office of Professional Competence, Planning and Development  
State Bar of California  
180 Howard Street  
San Francisco, CA 94105

Re: Proposed Rule 1-650

Dear Ms. Hollins:

On behalf of the California Commission on Access to Justice, I am writing to support adoption of proposed Rule of Professional Conduct 1-650 and to suggest two minor changes to the proposed rule, described below. We wholeheartedly endorse this effort to expedite consideration of this rule by the Supreme Court, and appreciate the work of the Rule Revision Commission in developing this thoughtful approach to the issues.

The California Commission on Access to Justice was established in 1996 to pursue long-term strategies to improve access to justice for low and moderate-income Californians. The Commission includes appointees from the Governor, the Attorney General, the President Pro Tem of the Senate, the Speaker of the Assembly, the California Judicial Council, California Judges Association, the State Bar of California, Consumer Attorneys of California, California Chamber of Commerce, California Labor Federation, League of Women Voters, the California Council of Churches, and the Council of California County Law Librarians.

Adoption of proposed Rule 1-650 would implement a key recommendation of the Access Commission's 2007 *Action Plan for Justice*.\*\* Recommendation 11 urged adoption of ABA Model Rule 6.5 "...to facilitate attorney participation in advice and counsel clinics." The Action Plan went on to say that "Clearing conflicts at a drop in clinic is so burdensome that few firms attempt it."

Given the extreme legal need that exists in our low-income communities, we believe that it is critical to do whatever we can to facilitate pro bono and eliminate unnecessary barriers. This Rule is a modest step that can make a significant difference, and has already worked well in many other jurisdictions.

The two proposed changes we would make to Proposed Rule 1-650 are:

1. Remove the specific language in the Rule that refers to specific programs that qualify for the Legal Services Trust Fund program according to statute. Because all of the programs that would qualify under this provision are already covered by the other categories listed in the Rule – law schools and nonprofits – this language is redundant and potentially misleading. We therefore urge its removal. [On lines 5-7, we propose removing “..or a qualified legal services project within the meaning of Business and Professions Code Section 6213(a).” We also propose adding on line 5 the word “or” between “law school” and “nonprofit organization.”]
2. In paragraph [1] of the notes, we urge modifying the language to take out the inference that an attorney-client relationship is always established in each of these drop-in clinics. There is now a self-help center in every county Superior Court in the state, and the guidelines for those centers, which were adopted by the Judicial Council, provide that the self-help centers be structured in such a way as to not establish an attorney-client relationship. They do not use the term “client,” they make sure individuals know that no confidentiality is established, and they are careful to provide information, but not advice. Therefore, paragraph [1] needs to be modified to accurately state the current situation in California – an attorney-client relationship is not always established at these clinics. We suggest the way to do that is to add, on line 29 the word “wherever” before “a lawyer-client relationship is established,” and then take out the word “but” ....so that the note would read:

In these programs, such as legal-advice hotlines, advice-only clinics or pro se counseling programs, wherever a lawyer-client relationship is established, there is no expectation that the lawyer’s representation of the client will continue beyond the limited consultation.

Thank you for giving us this opportunity to comment. Please let me know if we can provide any additional information for the Commission’s consideration.

Sincerely,



Hon. Steven K. Austin, Chair  
California Commission on Access to Justice

**THE STATE BAR  
OF CALIFORNIA**

180 HOWARD STREET, SAN FRANCISCO, CA 94105-1639

**COMMITTEE ON PROFESSIONAL  
RESPONSIBILITY AND CONDUCT**

TELEPHONE: (415) 538-2107

April 17, 2009

Audrey Hollins  
Office of Professional Competence,  
Planning and Development  
State Bar of California  
180 Howard Street  
San Francisco, CA 94105

Re: Proposed New Rule of Professional Conduct 1-650

Dear Ms. Hollins,

On behalf of the State Bar's Standing Committee on Professional Responsibility and Conduct (COPRAC), we provide the following comments on Proposed New California Rule of Professional Conduct 1-650 (Limited Legal Services Programs). For the reasons set forth below, COPRAC supports adoption of rule 1-650, but recommends some changes to paragraph 4 of the Discussion.

By way of background, COPRAC notes that for years the Board of Governors and the California Commission on Access to Justice have encouraged the participation of California attorneys in the performance of pro bono work. For example, in its Pro Bono Resolution, first adopted in 1989 and modified in 2002, the Board of Governors urges all attorneys to devote at least 50 hours per year to legal services to indigent individuals or to not-for-profit legal service organizations without expectation of compensation other than reimbursement of expenses. The Resolution also urges all law firms and governmental and corporate employers to promote and support the involvement of associates and partners in pro bono and other public service activities.

Pro bono clients deserve advice that is competent and conflict-free. By the same token, members who volunteer their services, and their law firms that permit and encourage them to do so, should have reasonable assurance that their pro bono work will not result in disqualification because of conflicts of interest between the firm's clients and the pro bono clients to whom the member has provided short-term limited legal services pursuant to proposed rule 1-650. This is clearly the intent of proposed rule 1-650.

Paragraph 4 of the Discussion to proposed rule 1-650 currently reads,

Because the limited nature of the services significantly reduces the risk of conflicts of interest with other matters being handled by the member's law firm, paragraph (b) provides that imputed conflicts of interest are inapplicable to a representation governed by this rule except as provided by paragraph (A)(2). Paragraph A(2) makes the participating member subject to imputed conflicts of interest when the lawyer knows that any lawyer in the member's law firm is disqualified by rule 3-310. By virtue of paragraph (B), moreover, a member's participation in a short-term limited legal services program will not be imputed to the member's law firm or preclude the member's law firm from

ATTACHMENT 5

*Letter to Audrey Hollins*

*April 17, 2009*

*Page 2 of 2*

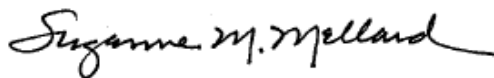
undertaking or continuing the representation of a client with interests adverse to a client being represented under the program's auspices. Nor will the personal disqualification of a lawyer participating in the program be imputed to other lawyers participating in the program.

Proposed rule 1-650 is based on ABA Model Rule 6.5. Similarly, paragraph 4 of the Discussion on rule 1-650 is based on paragraph 4 of the Comments to Model Rule 6.5. Model Rule 6.5 references Model Rule 1.10, which under certain circumstances requires screening to avoid imputation of conflicts of interest arising from a former representation. Contrary to the ABA Model Rule 1.10, the California Rules of Professional Conduct have no screening provision. Similarly, proposed rule 1-650(A)(2) does not discuss screening. COPRAC agrees that a firm employing a member who provided short-term limited legal services to a pro bono client pursuant to rule 1-650 should not run the risk of being disqualified if, unknown to the member, one of the firm's clients is directly adverse to the member's pro bono client or if the firm subsequently undertakes the representation of a client adverse to the member's pro bono client in a substantially related matter. However, COPRAC believes that under such circumstances, the member should be screened from the firm's engagement. Thus, COPRAC recommends that Discussion paragraph 4 be modified to read as follows (changes underscored):

Because the limited nature of the services significantly reduces the risk of conflicts of interest with other matters being handled by the member's law firm, paragraph (b) provides that imputed conflicts of interest are inapplicable to a representation governed by this rule except as provided by paragraph (A)(2). Paragraph A(2) makes the participating member subject to imputed conflicts of interest when the lawyer knows that any lawyer in the member's law firm is disqualified by rule 3-310. By virtue of paragraph (B), moreover, a member's participation in a short-term limited legal services program will not be imputed to the member's law firm or preclude the member's law firm from undertaking or continuing the representation of a client with interests adverse to a client being represented under the program's auspices. Nor will the personal disqualification of a lawyer participating in the program be imputed to other lawyers participating in the program. However, once the conflict is identified, the member should be screened from the member's firm's representation of a client with interests adverse to a client that the member previously represented under the program's auspices.

COPRAC thanks you for the opportunity to comment on proposed rule 1-650.

Very truly yours,



Suzanne M. Mellard, Chair  
Committee on Professional  
Responsibility and Conduct

copy: Mark Taxy, Staff Counsel  
COPRAC Members



# THE STATE BAR OF CALIFORNIA

## NEW PROPOSED RULE OF PROFESSIONAL CONDUCT 1-650



### Limited Legal Services Programs

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<b>Professional Affiliation</b> 	<input type="text" value="Lieff, Cabraser, Heimann &amp; Bernstein, LLP"/>	<b>Commenting on behalf of an organization</b> 	<input type="radio"/> Yes
			<input checked="" type="radio"/> No
<b>Name</b>	<input type="text" value="Kelly M. Dermody"/>		
<b>City</b>	<input type="text" value="San Francisco"/>	<b>State</b>	<input type="text" value="California"/>
<b>Email address</b> (You will receive a copy of your comment submission.)	<input type="text" value="kdermody@LCHB.com"/>		

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- AGREE ONLY IF MODIFIED

**ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below.**

At this time, when the need for legal services for low-income people is at an all-time high, it is critical that the legal profession take all reasonable steps to encourage and support pro bono legal services. This proposed Rule is a very significant step in this effort.



# THE STATE BAR OF CALIFORNIA

## NEW PROPOSED RULE OF PROFESSIONAL CONDUCT 1-650



### Limited Legal Services Programs

#### PUBLIC COMMENT FORM

**INSTRUCTIONS:** This form allows you to submit your comments by entering them into the text box below and/or by uploading files as attachments. *All information submitted is regarded as public record.*

**DEADLINE TO SUBMIT COMMENT IS: APRIL 17, 2009**

## Your Information

Professional Affiliation 	<input type="text" value="Partner in law firm"/>	Commenting on behalf of an organization 	<input type="radio"/> Yes
			<input checked="" type="radio"/> No
Name	<input type="text" value="Pam Fulmer"/>		
City	<input type="text" value="Alamo"/>	State	<input type="text" value="California"/>
Email address (You will receive a copy of your comment submission.)	<input type="text" value="mdapkf@mac.com"/>		

The following documents are available and can be viewed by clicking on the links

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[Proposed Rule 1-650 Agenda Item & Attachment.pdf](#)

[Proposed Rule 1-650 \(clean version & redline comparison to ABA MR 6.5\).pdf](#)

[Proposed Rule 1-650 \(clean version\).doc](#)

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- AGREE with this proposed Rule
- DISAGREE with this proposed Rule
- AGREE ONLY IF MODIFIED

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I believe that this proposed rule will result in larger numbers of attorneys being willing to take on more pro bono representations at legal walk-in clinics, etc.



# THE STATE BAR OF CALIFORNIA

## NEW PROPOSED RULE OF PROFESSIONAL CONDUCT 1-650

### Limited Legal Services Programs

#### PUBLIC COMMENT FORM

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**DEADLINE TO SUBMIT COMMENT IS: APRIL 17, 2009**

## Your Information

<b>Professional Affiliation</b> ?	<input type="text" value="Legal Services Attorney"/>	<b>Commenting on behalf of an organization</b> ?	<input type="radio"/> Yes
			<input checked="" type="radio"/> No
<b>Name</b>	<input type="text" value="Jennifer Greengold"/>		
<b>City</b>	<input type="text" value="San Francisco"/>	<b>State</b>	<input type="text" value="California"/>
<b>Email address</b> (You will receive a copy of your comment submission.)	<input type="text" value="jennifer.greengold@gmail.com"/>		

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- AGREE with this proposed Rule
- DISAGREE with this proposed Rule
- AGREE ONLY IF MODIFIED

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This proposed rule would be enormously helpful to legal services organizations and the clients they serve. In particular, it would assuage the concerns of law firms that are otherwise reluctant to take on pro bono work in light of possible conflicts of interest.

INNER

CITY

LAW

CENTER

Audrey Hollins  
Office of Professional Competence, Planning and Development  
State Bar of California  
180 Howard Street  
San Francisco, CA 94105

**Re: Proposed Rule 1-650**

Dear Ms. Hollins:

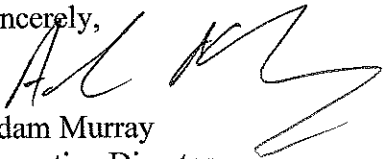
Inner City Law Center in Los Angeles provides direct legal services to more than 2,000 clients a year in the Skid Row area of Los Angeles. Given current budget constraints and the desire of many California attorneys to provide pro bono legal services, pro bono has the greatest potential for growth to help us meet the legal needs of the growing number of poor people in and around downtown Los Angeles.

California pro bono attorneys are, for the most part, prevented from participating in clinics and drop-in centers due to imputed conflict rules. Proposed Rule 1-650—which is substantially the same as rules already successful in a majority of states—would allow private attorneys to help screen clients and provide limited legal advice without any continuing attorney-client relationship. Only if a pro bono attorney has personal knowledge of a conflict with an existing client of the firm would the pro bono attorney be prevented from providing limited counsel and advice.

Since a large number of firms and individual attorneys seek pro bono opportunities that are regularly scheduled and have no continuing representation, adoption of Rule 1-650 could open a variety of creative ways for Inner City Law Center to expand legal outreach in Skid Row. Adoption would also allow a greater percentage of California attorneys to meet or exceed the State Bar Board of Governors recommended 50 hour of pro bono participation each year.

Inner City Law Center urges expeditious adoption of Proposed Rule 1-650, and we look forward to creating new opportunities for pro bono attorneys to help pursue greater access to justice for the poor in California.

Sincerely,

  
Adam Murray  
Executive Director

*Executive Director*  
Adam Murray

*Board of Directors*

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UCLA School of Law  
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Law Office of Timothy P. Dillon  
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Fulbright & Jaworski LLP  
Thomas A. Freiberg Jr.  
Mitchell Silberberg & Knupp LLP  
Valerie Goo  
Orrick, Herrington & Sutcliffe LLP  
Margaret Levy, Secretary  
Munnatt, Phelps & Phillips LLP  
Michael M. Maddigan  
O'Melveny & Myers LLP  
Jemie Oh  
Wells Fargo Law Department  
Sharon Oxborough  
Law Offices of Sharon Oxborough  
Alfredo Sanchez  
Citibank, Banamex USA  
Nicole Simonian  
Bryan Cave LLP  
Michael Spindler  
Deloitte Financial Advisory Services LLP  
Geoff Stover  
Paul Hastings  
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Irell & Manella LLP  
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T (213) 891-2880

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

*Founded on the basic principle that every human being should be treated with dignity and respect at all times, Inner City Law Center has been serving the poorest and most vulnerable individuals and families in Los Angeles County since 1980. ICLC provides representation and social service advocacy to over 2,000 homeless and working poor clients each year. ICLC is the only full-time provider of legal services headquartered on Skid Row and is widely recognized for its expertise in housing issues, as well as government and veterans benefits.*



# THE STATE BAR OF CALIFORNIA

## NEW PROPOSED RULE OF PROFESSIONAL CONDUCT 1-650

### Limited Legal Services Programs

#### PUBLIC COMMENT FORM

**INSTRUCTIONS:** This form allows you to submit your comments by entering them into the text box below and/or by uploading files as attachments. *All information submitted is regarded as public record.*

**DEADLINE TO SUBMIT COMMENT IS: APRIL 17, 2009**

## Your Information

Professional Affiliation	<input type="text" value="Partner in Law firm"/>	Commenting on behalf of an organization	<input type="radio"/> Yes
			<input checked="" type="radio"/> No
Name	<input type="text" value="Teresa Johnson"/>		
City	<input type="text" value="San Francisco"/>	State	<input type="text" value="California"/>
Email address (You will receive a copy of your comment submission.)	<input type="text" value="tjohnson@howardrice.com"/>		

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**From the choices below, we ask that you indicate your position on the Proposed rule. You may submit a comment below or provide an attachment regardless of whether you indicate your position from the choices.**

- AGREE with this proposed Rule
- DISAGREE with this proposed Rule
- AGREE ONLY IF MODIFIED

**ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below.**

*"The Unified Voice of Legal Services"*



April 17, 2009

Audrey Hollins  
Office of Professional Competence, Planning and Development  
State Bar of California  
180 Howard Street  
San Francisco, CA 94105

*Submitted via facsimile to 415-538-2171*

**Re: Proposed Rule 1-650 - SUPPORT**

Dear Ms. Hollins:

I am writing on behalf of the Legal Aid Association of California (LAAC) to express strong support for Proposed Rule 1-650 on behalf of our membership of legal services nonprofits in California.

Founded in 1984, the Legal Aid Association of California (LAAC) is a non-profit organization created for the purpose of ensuring the effective delivery of legal services to low-income and underserved people and families throughout California. LAAC is the statewide membership organization for more than 70 non-profit legal services organizations in the state.

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. Many of our member programs provide services to clients through clinics or other such programs where volunteer lawyers provide short-term limited legal services – such as advice or the completion of legal forms – that assist persons to address their legal problems without further representation by a lawyer. Proposed Rule 1-650 will significantly improve legal services programs' ability to recruit and partner with law firms and pro bono attorneys to increase services to clients in need.

Even before the current economic downturn, our member nonprofit legal services providers did not have the resources required to serve the large numbers of clients who approach them seeking help. Now, thousands more Californians are facing serious legal issues such as foreclosure and bankruptcy. The need for pro bono attorneys to assist legal services programs meet this overwhelming demand for services faced by the programs is evident, and that demand is increasing dramatically.

## ATTACHMENT 5

Legal Aid Association of California  
Proposed Rule 1-650: SUPPORT  
April 17, 2009  
Page 2 of 2

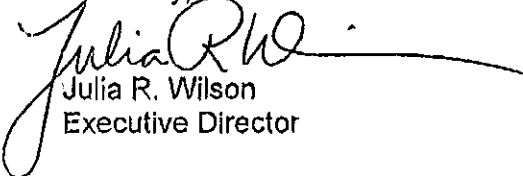
We encourage the State Bar to adopt two small modifications to the current Proposed Rule, to eliminate one redundancy and to clarify some information in the discussion section, as described below:

- The language in 1-650(A) is redundant, as all qualified legal services programs or support centers within the meaning of Business and Professions Code § 6213 are necessarily nonprofit corporations. Therefore, we would encourage that the Board of Governors simply remove the reference to "qualified legal services programs or support centers within the meaning of Business and Professions Code § 6213."
- We would also encourage a slight modification to Note [1] in the Discussion section to reflect that some clinics, including those that only distribute legal information as opposed to legal advice, do not necessarily lead to the establishment of an attorney-client relationship. We suggest that the following phrase be modified to read:  
*"In these programs, such as legal-advice hotlines, advice-only clinics or pro se counseling programs, if a lawyer-client relationship is established, ~~but~~ there is no expectation that the lawyer's representation of the client will continue beyond the limited consultation."*

Proposed Rule 1-650 will provide the assurance that law firms and volunteer attorneys need to fully participate in the programs which provide limited legal assistance to people in need. The legal communities in other states have had the benefit of Rule 6.5 for some time, and it will be a great help to have the equivalent protection in California. The proposed rule achieves the proper balance between client protection and meeting the needs of the disadvantaged. We believe that the proposed rule, with the discussion section, provides the California legal community with the clarity and comfort that will permit law firms and volunteer attorneys to better meet their ethical obligation to serve the many clients who would otherwise go without legal advice or assistance.

For these reasons, LAAC and our more than 70 member legal services nonprofits, strongly support the adoption of Proposed Rule 1-650. We thank the State Bar for pursuing this important course of action, and we hope that the rule can be adopted as expeditiously as possible.

Sincerely,



Julia R. Wilson  
Executive Director

(323) 801-7978  
 (323) 801-7945 fax  
 trothschild@lafba.org



**LACBA**

**LOS ANGELES COUNTY  
 BAR ASSOCIATION**

April 15, 2009

VIA FAX (415) 538-2171, ORIGINAL POSTED BY U.S. MAIL

Audrey Hollins  
 Office of Professional Competence, Planning and Development  
 State Bar of California  
 180 Howard Street  
 San Francisco, CA 94105

Re: Proposed Rule of Professional Conduct 1-650

Dear Ms. Hollins:

The Los Angeles County Bar Access to Justice Committee is committed to expanding access to justice for the poor and disadvantaged in our community. We are writing to support Proposed Rule 1-650 which will address the difficult issue of pro bono participation in legal aid clinics that provide walk-in advice and counsel to clients in need of assistance.

The need for pro bono attorneys to assist legal services programs meet the overwhelming demand for services faced by the programs is evident. In light of the huge increase in foreclosures and legal problems related to them, the demand is increasing dramatically. Proposed Rule 1-650 will provide law firms with the assurance they need to confidently participate in the programs which provide limited legal assistance to people in need. Our colleagues in other states have had the benefit of Rule 6.5 for some time, and it will be a great help to have the equivalent protection in California.

With regard to the proposed rule, we feel it achieves the proper balance between client protection and meeting the needs of the disadvantaged. We believe that the proposed rule, with the discussion sections, will provide private attorneys with the clarity and confidence needed to participate in legal aid clinics and will, as a result, provide pro bono attorneys with a crucial opportunity to assist the needy. The ability to participate in clinics is particularly important to those attorneys unable to take on more extended representation of the poor and disadvantaged. For that reason Proposed Rule 1-650 will aid those attorneys in meeting their ethical obligation to serve the many clients who would otherwise go without legal advice or assistance.

Thank you very much for pursuing this course. We hope that the rule can be adopted expeditiously and allow us to go forward in our work with the legal services community.

Sincerely,

Toby J. Rothschild, Chair  
 Access to Justice Committee

cc: Danette E. Meyers, President

MAILING ADDRESS:  
 P O Box 55020  
 Los Angeles CA 90055-2020  
 TELEPHONE: 213.627.2727  
 FACSIMILE: 213.896.6500  
 WEB SITE: www.lacba.org

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**LACBA**

**LOS ANGELES COUNTY  
BAR ASSOCIATION**

WRITER'S DIRECT LINE:

(909) 612-3921  
(909) 612-3920 fax  
josman@travelers.com

April 16, 2009

VIA FAX (415) 538-2171, ORIGINAL POSTED BY U.S. MAIL

**MAILING ADDRESS:**

P O Box 55020  
Los Angeles CA 90055-2020  
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WEB SITE: www.lacba.org

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Audrey Hollins  
Office of Professional Competence, Planning and Development  
State Bar of California  
180 Howard Street  
San Francisco, CA 94105

Re: Comments on Proposed New California Rule of Professional Conduct 1-650

Dear Ms. Hollins:

The Los Angeles County Bar Association Professional Responsibility and Ethics Committee ("PREC") is pleased to provide its comments regarding proposed California Rule of Professional Conduct 1-650.

The PREC has carefully considered proposed Rule 1-650 and believes that it is not only a laudable modification of the California Rules of Professional Conduct, but is absolutely essential.

As a result of the current economic crisis, more people than ever before in California, particularly those facing the loss of their homes, are in need of the legal assistance offered by clinics and other organizations staffed by attorneys providing their time on a pro bono basis. The need for attorneys to volunteer to provide such advice and counsel is thus equally great, if not greater. Proposed Rule 1-650 eliminates one potential disincentive for attorneys who would otherwise be willing to volunteer their time for these programs – the possibility that such representation would unwittingly give rise to a conflict of interest for the attorney or an imputed conflict of interest to his/her firm in violation of the Rules of Professional Conduct.

We believe that proposed Rule 1-650 is not inconsistent with the objectives of Rule 3-310. Specifically, because such pro bono advice and counsel is limited in scope and time, and Rule 1-650 applies only to conflicts of interest unknown to the attorney at the time of the pro bono representation, there is unlikely to be any actual impact on the duty of loyalty owed by the attorney and his/her firm to current clients. For these same reasons, there is unlikely to be any adverse impact on the attorney's duty of confidentiality – and that of his/her firm – to former clients. Moreover, because the exception to Rule 3-310 that proposed Rule 1-650 would create is narrowly

## ATTACHMENT 5

Audrey Hollins  
Re: LACBA PREC Comments on Proposed Rule 1-650

April 16, 2009  
Page 2 of 2

circumscribed, there should be no danger that the Rule 3-310 would be swallowed by this exception – i.e., the strict prohibitions against attorney conflicts of interests will continue in all other contexts.

Also supporting the adoption of proposed Rule 1-650 is the fact that many other states have adopted similar rules based upon Rule 6.5 of the ABA Model Rules of Professional Responsibility. If California is to maintain its position as the nation's leader in the development and utilization of rules of professional conduct that address the needs of clients and attorneys, proposed Rule 1-650 should be adopted forthwith.

In addition, we believe that the comments accompanying the rule should be retained if the rule is adopted. These comments will provide valuable guidance to members as they attempt to comply with the rule.

Simply put, proposed Rule 1-650 is desperately needed. This rule facilitates the provision of legal services to individuals most in need of those services, and who would otherwise have to go without. The proposed rule also promotes pro bono work by members of the bar, enabling attorneys to give back to society, with a collateral benefit of enhancing the public image of the profession. Furthermore, the proposed rule does not, as a practical matter, undermine the objectives of Rule 3-310 – insuring that attorneys honor their duties of loyalty and confidentiality to their clients.

For each of these reasons, the PREC strongly supports the adoption of proposed Rule 1-650.

Very truly yours,



Joel A. Osman  
Chair  
Professional Responsibility and Ethics Committee

cc: Danette E. Meyers, President



# THE STATE BAR OF CALIFORNIA

## NEW PROPOSED RULE OF PROFESSIONAL CONDUCT 1-650


### Limited Legal Services Programs

#### PUBLIC COMMENT FORM

**INSTRUCTIONS:** This form allows you to submit your comments by entering them into the text box below and/or by uploading files as attachments. *All information submitted is regarded as public record.*

**DEADLINE TO SUBMIT COMMENT IS: APRIL 17, 2009**

## Your Information

Professional Affiliation 	<input type="text"/>	Commenting on behalf of an organization 	<input type="radio"/> Yes <input type="radio"/> No
Name	<input type="text" value="James Mink"/>		
City	<input type="text" value="San Francisco"/>	State	<input type="text" value="California"/>
Email address (You will receive a copy of your comment submission.)	<input type="text" value="jlmink@jonesday.com"/>		

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- AGREE with this proposed Rule  
 DISAGREE with this proposed Rule  
 AGREE ONLY IF MODIFIED

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---

**O'MELVENY & MYERS LLP**

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April 16, 2009

OUR FILE NUMBER  
600,000-4

***VIA EMAIL AND U.S. MAIL***

WRITER'S DIRECT DIAL  
213-430-8366

Ms. Audrey Hollins  
Office of Professional Competence  
Planning and Development  
State Bar of California  
180 Howard Street  
San Francisco, California 94105

WRITER'S E-MAIL ADDRESS  
dlash@omm.com  
mchecov@omm.com

**Re: Support for Proposed California Rule of Professional Conduct 1-650**

Dear Ms. Hollins:

On behalf of the law firms listed on the attached Exhibit A, each having one or more offices within the State of California, we are writing to support proposed California Rule of Professional Conduct 1-650. The authors of this letter are Martin S. Checov, the General Counsel of O'Melveny & Myers LLP and David A. Lash, world-wide Managing Counsel of O'Melveny's public interest and *pro bono* services.

Proposed Rule 1-650, which tracks ABA Model Rule 6.5 facilitating *pro bono* representations by law firms in other states (and non-California offices of the undersigned law firms), addresses important concerns regarding the imputation of conflicts of interest to the law firm whose attorneys participate in legal aid clinics or other legal services programs by providing, on a *pro bono* basis, limited-scope walk-in advice and counsel to low-income clients in need of assistance.

Each of the undersigned firms, through its attorneys and staff, is actively engaged in the provision of critical *pro bono* legal services to low-income individuals, families, organizations and communities, representing an important component of the delivery system for *pro bono* legal services. Despite the significant commitment made by the undersigned firms and by other lawyers throughout the state, the demand for essential *pro bono* legal services continues to outstrip conventional resources. Staffed by such lawyers, limited-scope *pro bono* walk-in clinics and other similar legal services programs—whether sponsored by a legal aid program, a court, a bar association, a law school or other similar entity—are an indispensable means of making immediate basic and essential counsel available to a large number of clients whose needs are best met on an expedited basis.

Absent this proposed rule, the provision of vital assistance in such clinics could be delayed because of precautions—in particular the desire to perform comprehensive conflict searches before any advice can be dispensed—that participating firms consider necessary to protect their other client relationships from imputed disqualification. In some cases, delay may be irreversibly prejudicial to the client's protection.

We believe proposed Rule of Professional Responsibility 1-650 achieves the proper balance between meeting the often-urgent legal needs of those who cannot otherwise afford legal services, on the one hand, and the duty of loyalty to other clients of firms whose lawyers volunteer for such programs, on the other. The proposed rule and its accompanying commentary will afford such firms sufficient certainty in regard to the possible imputation of conflicts of interest to enable their lawyers to participate fully in legal aid clinics that supply critically important legal services.

As proposed, Rule of Professional Responsibility 1-650 reads:

***Rule 1-650. Limited Legal Services Programs***

- (A) *A member who, under the auspices of a program sponsored by a court, government agency, bar association, law school or nonprofit organization, provides short-term limited legal services to a client without expectation by either the member or the client that the member will provide continuing representation in the matter:*
- (1) *is subject to rule 3-310 only if the member knows that the representation of the client involves a conflict of interest; and*
  - (2) *is subject to an imputed conflict of interest only if the member knows that another lawyer associated with the member in a law firm would be subject to a conflict of interest under rule 3-310 with respect to the matter.*
- (B) *Except as provided in paragraph (A)(2), a conflict of interest that arises from a member's participation in a program under paragraph (A) will not be imputed to the member's law firm.*

This draft language represents a revision made to subparagraph (A) as originally presented in the draft attached to the March 11, 2009 memo to the Committee on Planning, Program Development & Budget from the staff of the Special Commission for the Revision of the Rules of Professional Conduct. The revision is as follows:

*(A) A member who, under the auspices of a program sponsored by a court, government agency, bar association, law school, <u>or</u> nonprofit organization, ~~or a qualified legal services project or qualified support center within the meaning of Business and Professions Code § 6213 . . . .~~*

We consider this change to be appropriate from the standpoint of drafting simplicity, accuracy and logic. The undersigned strongly support the current version appearing in italics above, making the deletion reflected in the redlined language, for the following reasons:

O'MELVENY & MYERS LLP

Ms. Audrey Hollins, April 16, 2009 - Page 3

1. “[Q]ualified legal services projects” and “qualified support centers” within the meaning of Business and Professions Code § 6213 are wholly subsumed within the preceding general references to courts, government agencies, bar associations, law schools and nonprofit organizations and are therefore wholly redundant. As a result, their inclusion through the disjunctive “or” may cause unnecessary confusion and suggest—erroneously—that they were intended to condition or limit the scope of the preceding general references.

2. The terms “qualified legal services projects” and “qualified support centers” are defined by Business and Professions Code § 6213 for the purpose of determining eligibility for receiving IOLTA payments, a categorization which is not germane to attorney conflict of interest issues to which the proposed rule pertains.

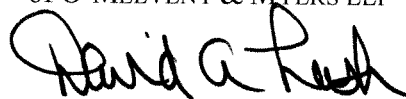
3. The inclusion of express statutory cross-references creates an unnecessary risk that future amendments to other statutes may have an unforeseen and unintended impact on the rule of professional conduct.

It is our hope that the rule in the form endorsed by the undersigned can be adopted expeditiously, and would be pleased to offer any assistance you may be deem appropriate.

Very truly yours,



Martin S. Checov  
of O'MELVENY & MYERS LLP



David A. Lash  
for O'MELVENY & MYERS LLP

MSC:DAL:bab

Enclosure: Exhibit A

**EXHIBIT A**

***FIRMS JOINING IN SUPPORT:***

Peter H. Carson, Esq.  
BINGHAM MCCUTCHEN LLP

Janis M. Meyer, Esq.  
DEWEY LEBOEUF LLP

D. Ronald Ryland, Esq.  
General Counsel  
SHEPPARD MULLIN RICHTER &  
HAMPTON LLP

Dean J. Kitchens, Esq.  
Kevin S. Rosen, Esq.  
GIBSON DUNN & CRUTCHER LLP

Donald E. Bradley, Esq.  
General Counsel  
WILSON SONSINI GOODRICH &  
ROSATI PC

Eve M. Coddon, Esq.  
PAUL HASTINGS JANOFSKY &  
WALKER LLP

Douglas L. Hendricks, Esq.  
MORRISON & FOERSTER LLP

Arthur Newbold, Esq.  
DECHERT LLP

Jon Dean, Esq.  
MCDERMOTT WILL & EMERY LLP

Bryant C. Boren, Esq.  
BAKER BOTTS L.L.P.

Robert J. Kafin, Esq.  
PROSKAUER ROSE LLP

Brian Forbes, Esq.  
DLA PIPER US LLP

Ronald E. Van Buskirk, Esq.  
PILLSBURY WINTRHOP SHAW  
PITTMAN LLP

Edward J. Zulkey, Esq.  
BAKER MCKENZIE INTERNATIONAL

Robert C. Bernius, Esq.  
NIXON PEABODY LLP

Michael J. Silverman, Esq.  
DUANE MORRIS LLP

James R. Segerdahl, Esq.  
K&L GATES LLP

Christopher A. Westover, Esq.  
Maureen Alger, Esq.  
COOLEY GODWARD KRONISH LLP

Barbara A. Caulfied, Esq.  
Dean Hansell  
DEWEY LEBOEUF LLP

Lori McAllister, Esq.  
DYKEMA

ATTACHMENT 5

Chris M. Amantea, Esq.  
Hunton & Williams

John W. Amberg, Esq.  
BRYAN CAVE LLP

William T. Quicksilver, Esq.  
Cristin M. Zeisler, Esq.  
MANATT, PHELPS & PHILLIPS, LLP

Michael J. Silverman, Esq.  
DUANE MORRIS LLP



# THE STATE BAR OF CALIFORNIA

## NEW PROPOSED RULE OF PROFESSIONAL CONDUCT 1-650



### Limited Legal Services Programs

#### PUBLIC COMMENT FORM

**INSTRUCTIONS:** This form allows you to submit your comments by entering them into the text box below and/or by uploading files as attachments. *All information submitted is regarded as public record.*

**DEADLINE TO SUBMIT COMMENT IS: APRIL 17, 2009**

## Your Information

Professional Affiliation 	<input type="text"/>	Commenting on behalf of an organization 	<input type="radio"/> Yes <input type="radio"/> No
Name	<input type="text" value="Jenie Oh"/>		
City	<input type="text" value="Los Angeles"/>	State	<input type="text" value="California"/>
Email address (You will receive a copy of your comment submission.)	<input type="text" value="jenieoh@gmail.com"/>		

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[Proposed Rule 1-650 Agenda Item & Attachment.pdf](#)

[Proposed Rule 1-650 \(clean version & redline comparison to ABA MR 6.5\).pdf](#)

[Proposed Rule 1-650 \(clean version\).doc](#)

**From the choices below, we ask that you indicate your position on the Proposed rule. You may submit a comment below or provide an attachment regardless of whether you indicate your position from the choices.**

- AGREE with this proposed Rule  
 DISAGREE with this proposed Rule  
 AGREE ONLY IF MODIFIED

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# THE STATE BAR OF CALIFORNIA

## NEW PROPOSED RULE OF PROFESSIONAL CONDUCT 1-650

### Limited Legal Services Programs

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## Your Information

Professional Affiliation	<input type="text" value="Public Counsel"/>	Commenting on behalf of an organization	<input checked="" type="radio"/> Yes <input type="radio"/> No
Name	<input type="text" value="Elizabeth Bluestein"/>		
City	<input type="text" value="Los Angeles"/>	State	<input type="text" value="California"/>
Email address (You will receive a copy of your comment submission.)	<input type="text" value="ebluestein@publiccounsel.org"/>		

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Public Counsel strongly supports the adoption of Proposed Rule 1-650, which would remove barriers to participation in pro bono legal clinics.

Public Counsel is the public interest law office of the L.A. County and Beverly Hills Bar Associations and the Southern California affiliate of the Lawyers' Committee for Civil Rights Under Law. Public Counsel is dedicated to advancing equal justice under law by delivering pro bono legal services to the most vulnerable members of our community, including abused and abandoned children, homeless families and veterans, senior citizens, victims of consumer fraud and nonprofit organizations serving low-income communities, and mobilizing the pro bono resources of the community's attorneys and law students.

Even before the current economic downturn, nonprofit legal services providers such as Public Counsel did not have the resources to serve even half of the number of clients who approach us seeking help. Now, thousands more Californians are facing serious legal issues such as foreclosure and bankruptcy. If pro bono assistance is not available to

[SEE ATTACHMENT]

## ATTACHMENT 5

Public Counsel strongly supports the adoption of Proposed Rule 1-650, which would remove barriers to participation in pro bono legal clinics.

Public Counsel is the public interest law office of the L.A. County and Beverly Hills Bar Associations and the Southern California affiliate of the Lawyers' Committee for Civil Rights Under Law. Public Counsel is dedicated to advancing equal justice under law by delivering pro bono legal services to the most vulnerable members of our community, including abused and abandoned children, homeless families and veterans, senior citizens, victims of consumer fraud and nonprofit organizations serving low-income communities, and mobilizing the pro bono resources of the community's attorneys and law students.

Even before the current economic downturn, nonprofit legal services providers such as Public Counsel did not have the resources to serve even half of the number of clients who approach us seeking help. Now, thousands more Californians are facing serious legal issues such as foreclosure and bankruptcy. If pro bono assistance is not available to these clients, many of them have no other choice but to handle their legal claims without any help from an attorney. In such circumstances, limited assistance legal clinics are playing an increasingly important role in improving access to justice.

We believe that Proposed Rule 1-650 would greatly enhance our ability to serve our clients by making it possible for more law firm attorneys to participate in legal clinics. Law firm attorneys are very interested in participating in pro bono clinics, but they fear participating in clinics that give legal advice because of the existing imputed conflicts rules. The limited loosening of these rules by Proposed Rule 1-650 would facilitate lawyers participating in clinics that provide limited legal services that are so sorely needed, without fear of creating unwanted conflicts for the firm.

For these reasons, we strongly support adoption of Proposed Rule 1-650.



# THE STATE BAR OF CALIFORNIA

## NEW PROPOSED RULE OF PROFESSIONAL CONDUCT 1-650



### Limited Legal Services Programs

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## Your Information

Professional Affiliation 	<input type="text"/>	Commenting on behalf of an organization 	<input type="radio"/> Yes
			<input checked="" type="radio"/> No
Name	<input type="text" value="Jeffrey Ross"/>		
City	<input type="text" value="San Francisco"/>	State	<input type="text" value="California"/>
Email address (You will receive a copy of your comment submission.)	<input type="text" value="jeff.ross@pillsburylaw.com"/>		

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The proposed rule is an important tool for providing services to the poor and unrepresented. Please enact the rule.



# THE STATE BAR OF CALIFORNIA

## NEW PROPOSED RULE OF PROFESSIONAL CONDUCT 1-650


### Limited Legal Services Programs

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## Your Information

Professional Affiliation 	<input type="text" value="Shartsis Friese LLP"/>	Commenting on behalf of an organization 	<input type="radio"/> Yes
			<input checked="" type="radio"/> No
Name	<input type="text" value="Tracy Salisbury"/>		
City	<input type="text" value="San Francisco"/>	State	<input type="text" value="California"/>
Email address (You will receive a copy of your comment submission.)	<input type="text" value="tsalisbury@sflaw.com"/>		

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## Your Information

Professional Affiliation	<input type="text"/>	Commenting on behalf of an organization	<input type="radio"/> Yes <input type="radio"/> No
Name	<input type="text" value="Mary S. Twomey"/>		
City	<input type="text" value="San Francisco"/>	State	<input type="text" value="California"/>
Email address (You will receive a copy of your comment submission.)	<input type="text" value="marytwomey1@gmail.com"/>		

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As a social worker who has accompanied clients to court in family law and landlord tenant cases, I know how important it is for clients to have access to legal representation. I urge the State Bar to pass Proposed Rule 1-650 - anything that can help to increase rates of pro bono involvement for low income clients is appreciated. Thank you.