

## CIVIL JUSTICE STRATEGIES TASK FORCE REPORT AND RECOMMENDATIONS PUBLIC COMMENT

No.	DATE	INDIVIDUAL/ORGANIZATION	SUMMARY OF COMMENTS	SUPPORT / OPPOSE
1.	04/01/15	George Huang	<p>Legal Technician licensing will reduce prices and will only serve to exacerbate the access to legal services and increase the number of young lawyers afflicted by law school debt.</p> <p>Suggests that law students be required to spend at least 1 year working for legal aid clinics.</p>	Opposes Limited License Legal Technicians (LLLT)
2.	04/01/15	B. Keith Martin	Suggest that MCLE requirements be imposed on Limited Licensed Legal Technicians (LLLT).	No position – MCLE should be required for LLLT
3.	04/02/15	Robert Crownover	The LLLT program may help if the LLLTs are required to work for attorneys. However, turning LLLTs loose could result in the same problems that the Patent Agents create in the patent law community, which are substantial. Lastly, if a client is willing and able to pay I have never seen them go without help from an attorney.	Supports LLLTs w / conditions
4.	04/02/15	Octavio Guillen, Court Executive Officer & Joyce MacLaury, Family Law Facilitator, Sonoma County Superior Court	Services which provide assistance at counsel table would fit better as a Bar Program because the integrity of the court and self-help centers relies on maintaining clear and consistent neutrality. Regardless of the nomenclature used, "navigator" or "facilitator," sitting at counsel table challenges the boundaries of neutrality. Programs piloted through local bar association lawyer referral panels could support a culture of service within the local bar that could extend beyond "navigators" to include unbundled, low cost, and pro bono services through existing legal service agencies.	Opposes – navigators

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5.	04/02/15	Cary McReynolds	The areas of unlawful detainer and family law, where issues are often discrete and the law focused; there is no reason that individuals with training to be an LLLT could not represent individuals competently.	Supports LLLTs
6.	04/03/15	Robert Pasquinelli	LLTs would further erode the practice of law. The State Bar should, instead, promote and encourage young lawyers to do this work. The Bar should make representation of the poor a requirement of newly admitted attorneys.	Opposes LLLTs
7.	04/11/15	Susan C. Volpé	Give greater acknowledgment to the independent paralegal profession as Legal Document Assistants (LDAs) and foster relationships and access viable alternative time tested sources in educating new attorneys and recognize LDA's as Limited Licensing Legal Technicians.	Supports LLTs
8.	04/15/15	Patricia Brown	Do not sanction a LLLT program without oversight and sanctions.	Opposes LLLTs
9.	04/16/15	Kenneth Brooks	Delivery of justice requires attorneys. Incubators are a good platform to provide access to and delivery of legal services.	Opposes – LLLTs Supports - Incubators
10.	04/18/15	Mark Baer	Have very serious concerns with utilizing "legal technicians" to handle Family Law and Domestic Violence matters. The Bar is far too lenient on unethical lawyers. The Bar completely disregards the impact of litigating as a means of resolving disputes involving people with any type of interpersonal relationship.	Opposes - LLLTs

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11.	04/18/15	James Cherry	Supports the notion that the State Bar allow paralegals and LDAs to participate to a limited extent in the resolution of court disputes. Believes that the larger interest of providing services to our community to resolve conflicts outweighs any disadvantages to fellow members of the State Bar.	Supports LLLTs
12.	04/23/15	Kelly McNamara	Supports court re-engineering to make electronic filing/delivery of court documents available to self-represented litigants to allow court users of low or modest means to save the expense of the trip to the courthouse, particularly because budget restrictions have forced the Court to reduce and in some cases eliminate entirely services at outlying courts.	Supports court-reengineering
13.	04/24/14	Barbara Liss	<p>Supports a tightly drawn, specific proposal which clearly identifies procedural tasks for family law and unlawful detainer processes, as well as for some estate planning areas and perhaps low value civil litigation matters not economically feasible for attorneys to take up. UPL rules should be minimally relaxed for persons who meet predetermined knowledge thresholds and demonstrate minimum skills via testing standards.</p> <p>An entity independent from the State Bar should be established for the oversight of the new licensure program.</p>	Supports - LLLTs
14.	04/28/15	Eileen R. Simon	The 138,000 practicing attorneys should contribute 50 mandatory / documented pro bono hours a year to bridge the access gap.	Supports mandatory pro bono



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17.	05/08/15	Hon. Mark A. Juhas, Chair, California Commission on Access to Justice (Continued)	<p>Recommends that the State Bar Board of Trustees create a timeline for implementation of both the LLLT and Court Navigator programs and prompt consultation with the Judicial Council and other stakeholders, so implementation can move apace.</p> <p>Recommends that the Board of Trustees make the implementation of these programs a priority for the State Bar's new Executive Director, and for incoming Trustees, as well.</p>	<p>Supports LLLTs</p> <p>Supports LLLTs and navigators</p>
18.	05/08/15	Emily Aldrich, Chair & Shawtina Ferguson, Chair Elect, California Young Lawyers Association	<p>Given CYLA's capabilities and limited resources, CYLA supports the State Bar's Law School Debt Initiative by, using social media outlets to disseminate information that is provided by CJSTF/The State Bar to its membership.</p> <p>Supports incorporating debt management as a conversation topic into CYLA's outreach solutions already in practice; and Co-Sponsorship of Student Debt Workshops hosted by the State Bar and/or local bar associations.</p>	Supports law school debt initiatives
19.	05/08/15	Prescott Cole, Senior Staff Attorney, California Advocates for Nursing Home Reform (CANHR)	<p>Potential for harm to seniors because of malpractice by technicians would be inevitable and immeasurable.</p> <p>There is no guarantee that a person who holds a limited license will restrain himself or herself from exceeding the scope of their license.</p>	Opposes LLLTs

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19.	05/08/15	Prescott Cole, Senior Staff Attorney, California Advocates for Nursing Home Reform (CANHR) (Continued)	<p>As the State Bar since it has no current statutory authority to regulate the activities of these technicians, who will do so?</p> <p>If the State Bar isn't currently challenging the licensed attorney's about the quality of their legal advice, then how does it propose to challenge the work quality of legal technicians?</p> <p>CANHR is concerned about how legal technicians are likely to use their State Bar law "license" as a marketing tool. Having a State Bar Legal License has the potential of misleading consumers about the competency level of the holder of the license.</p> <p>It is unlikely that ethical standards will be established for legal technicians. How does the State Bar intend to police the activities of legal technicians and protect the public against any unethical conduct?</p> <p>Creating a new class of professionals who can give legal advice in a state like California that has a surplus of lawyers does not serve the State Bar members well, nor does it serve the public well.</p>	Opposes LLLTs
20.	05/11/15	Ian M. Duncan, President, California Association of Legal Document Assistants (CALDA)	Confused at the appearance of so much text in the draft report regarding law school debt and question the relevance of that subject in relation to need for legal access.	Concern about nexus w/law school debt

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20.	05/11/15	Ian M. Duncan, President, California Association of Legal Document Assistants (CALDA) (Continued)	<p>Untethering the Legal Document Assistant (LDA) from outdated restrictions and growing the LDA profession will be one very effective way to enhance access to justice.</p> <p>Unreasonably high educational requirements, requiring traditional law firm, experience and exclusion of grandfathering of the current workforce will create a new type of highly-paid professional who will charge a great deal of money for his or her services.</p> <p>The State Bar should not be the regulatory agency in charge of licensing, monitoring, and otherwise overseeing the Legal Technicians. Rather, an administrative agency in the Executive Branch should be created.</p> <p>The recommendation regarding “re-engineering” deserves immediate consideration.</p>	<p>Supports LLLTs</p> <p>Concern re LLLTs educational requirements</p> <p>Opposes State Bar LLLTs oversight</p> <p>Supports court re-engineering</p>
21.	05/11/15	Maria C. Livingston, Chair, Standing Committee on the Delivery of Legal Services (SCDLS)	<p>Consider drawing upon a richer and more colorful array of voices from the world of advocacy and from current providers of services to those in need to your future discussions.</p> <p>Wholeheartedly supports raising awareness about the Justice Gap Fund in order to increase donations.</p>	<p>Supports more inclusive conversations</p> <p>Supports raising awareness about the Justice Gap Fund</p>

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21.	05/11/15	Maria C. Livingston, Chair, Standing Committee on the Delivery of Legal Services (SCDLS)	<p>Agrees that the incubator model serves as an example of how law schools and other stakeholders can help fill the justice gap for modest means litigants.</p> <p>Suggests that there be additional analysis of how these incubator programs can be replicated in rural areas where newer attorneys are less inclined to practice, and where the connection between the nearest law school and a rural community is generally more remote.</p> <p>Suggests that Incubator programs can also help new attorneys who aspire to careers in Alternative Dispute Resolution while helping litigants by providing the opportunity to resolve matters outside formal court proceedings.</p> <p>Supports the recommendation that the State Bar do more to promote and incentivize limited scope representation.</p> <p>SCDLS is well-positioned to help the State Bar make linkages between the Judicial Council and providers of affordable legal services, as well as interested State Bar entities.</p> <p>Supports efforts to try to close the justice gap to the poor through universal representation and consequently agrees with the recommendation that the State Bar support the right to civil Gideon.</p>	<p>Supports incubators</p> <p>Supports rural incubators</p> <p>Supports ADR incubators</p> <p>Supports limited scope representation</p> <p>Supports Civil Gideon</p>

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21.	05/11/15	Maria C. Livingston, Chair, Standing Committee on the Delivery of Legal Services (SCDLS) (Continued)	<p>Supports additional information gathering and dialogue regarding the creation of Limited License Legal Technicians (LLLT) for the State of California and supports and encourages additional discussions with interested constituencies to better define the potential benefits and concerns related to the role of LLLTs in the delivery of legal services.</p> <p>Supports discussions on how court procedures could be simplified to provide greater access to self-represented litigants.</p> <p>The concept of a navigator program should be explored further and that key components of any such program would have to include intensive training and supervision.</p> <p>Agrees with the CJSTF Report’s conclusion that high law school debt deters lawyers from pursuing careers that would enable them to serve low-and moderate-income Californians and supports the recommendation that the State Bar consider ways it can join the national dialogue on developing new and enhanced loan forgiveness and repayment approaches.</p>	<p>Supports LLLT information gathering</p> <p>Supports court re-engineering</p> <p>Supports navigators</p> <p>Supports law school debt initiatives</p>

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22.	05/11/15	Victoria M. Newman, RP	<p>The groundwork has already been laid for LLLTs with Business and Professions code sections 6400-6415 (Legal Document Assistants (LDA) and Unlawful Detainer Assistant (UDA)) and 6450, <i>et seq.</i>, which regulates paralegals. Recommends incorporation of mandatory continuing education requirements, similar to the paralegal MCLE, which will include ethics. LLLT should have access to an attorney for complicated matters or as a resource to make sure the LLLT is not inadvertently practicing law without a license. The LLLT should have, as a minimum, so many years of experience in the area of law they wish to serve.</p> <p>LLLTT is a natural stepping stone from what a LDA or UDA can provide. It is also a natural stepping stone in the professional path of a paralegal that does not wish to go to law school but does wish to assist the community at large in some kind of legal capacity.</p>	Supports LLLTs
23.	05/11/15	John Pollock Coordinator, National Coalition for a Civil Right to Counsel	<p>Supports a right to counsel in the areas of landlord/tenant, domestic violence, family law, and immigration.</p> <p>Supports scaling up the Shriver pilot projects, as these pilots are key to collecting the necessary data demonstrating the positive impacts of providing counsel.</p>	<p>Supports right to counsel</p> <p>Supports scaling Shriver projects</p>

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24.	05/11/15	Stephen Barnes, Program Director Paralegal Studies Coastline Community College, on behalf of an informal California consortium of paralegal program directors and instructors	<p>Requests that existing paralegal programs be provided an opportunity to be heard on the issue of education and training for any such proposal.</p> <p>Existing paralegal training programs in this state have decades of experience; curriculum development mechanisms, expert practice area instructors; assessment methodology, oversight, and college infrastructure to offer training within the framework of any licensing procedure which may be proposed.</p> <p>One of the issues we see is making sure the education is not only comprehensive but affordable. If the cost of obtaining the LLLT license is prohibitive it would defeat the purpose of licensing LLLTs as an effort to provide access to justice to underserved populations.</p>	Supports paralegal curriculum for LLLTs
25.	05/11/15	Sands McKinley	<p>This program will provide little to no benefit for low-income individuals who want or need legal representation from an attorney.</p> <p>Although the stated purpose for the Washington LLLT program is to promote access to justice for those in need, there is no requirement that LLLTs cap their rates or provide services to low-income individuals.</p>	Opposes LLLTs

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25.	05/11/15	Sands McKinley (Continued)	<p>California will likely discover that the greatest service it can provide for those in need is to provide readily available public information regarding everyday legal problems, how those problems can be resolved (through diverse pathways), and how and where to access available resources, including from for-profit lawyers, non-profit organizations, and government programs.</p> <p>If California Bar Association and/or its Supreme Court decides to implement an LLLT program, California should require lawyer supervision of LLLTs.</p> <p>It would be a mistake to require less qualification than Washington does for LLLT licensing, unless California requires lawyer supervision and responsibility for LLLT services.</p>	Opposes LLLTs
26.	05/11/15	Tom Gordon, Executive Director Responsive Law	<p>In contrast to the current recommendation offered by the Task Force on alternative business structures, we urge the Task Force to recommend changes that allow outside investment for legal startups in California.</p> <p>Consumers already benefit from innovations such as unbundled legal services and online legal services that were unthinkable a decade or two ago. Allowing outside investments for legal startups would provide California with an abundance of new entities addressing the access to justice gap.</p>	Opposes limited recommendation on ABS

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26.	05/11/15	Tom Gordon, Executive Director Responsive Law (Continued)	<p>Given the Task Force’s laudable intent to recommend adoption of limited license legal technicians (LLTs) and the Navigator program, we strongly encourage that the Task Force recommend revision of the unauthorized practice of law (UPL) statute so that it better allows for models like LLTs, the Navigator program, and other innovative means of providing legal services.</p> <p>The Task Force should recommend the California State Bar look to Texas for inspiration regarding a UPL safe harbor provision. The Texas statute excludes from UPL the following: “design, creation, publication, distribution, display, or sale, including publication, distribution, display, or sale by means of an Internet web site, of written materials, books, forms, computer software, or similar products if the products clearly and conspicuously state that the products are not a substitute for the advice of an attorney.</p> <p>The Task Force should specifically recommend altering the Washington model in two ways: crafting a less restrictive ownership model and improving the financial structure.</p> <p>The Task Force should also recommend allowing private, potentially fee-based programs as the UK does for “McKenzie friends.”</p>	<p>Supports LLTs &amp; navigators</p> <p>Supports UPL regulation reform</p>

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26.	05/11/15	Tom Gordon, Executive Director Responsive Law (Continued)	The Task Force should recommend that California launch a compact with other states to allow for multi-jurisdictional practice as a way to creatively address access to justice gaps.	Espouses multi-state MJP Pact
27.	05/11/15	Salena Copeland, Executive Director, Legal Aid Association of California	LAAC supports the recommendation to boost promotion of the Justice Gap Fund and appreciates the State Bar’s continued support of the Justice Gap Fund.	Supports promotion of Justice fund
			<p>LAAC supports the recommendation to track the trajectory of incubator participants to the extent that it does not require additional data collection of current incubator programs without additional funding or adequate notice to track participants. Incubator programs, particularly those that are designed in partnership with a legal aid organization, are promising models to both train new attorneys and serve modest means Californians.</p> <p>If the Bar creates future toolkits or forms, we recommend that the Bar seek input from legal aid organizations that currently run incubator programs.</p>	Supports incubators
			LAAC supports the recommendation that the State Bar do more to promote and incentivize limited scope representation and further recommends that judicial education should be a key component of promoting unbundled services.	Supports limited scope representation

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27.	05/11/15	Salena Copeland, Executive Director, Legal Aid Association of California (Continued)	<p>Supports continued coordination between the State Bar and Judicial Council, and we are aware that staff at both bodies, particularly those in the State Bar Office of Legal Services and the Judicial Council’s Center for Families, Children &amp; the Courts collaborate with each other frequently and strive to keep each other informed of statewide coordination opportunities.</p> <p>Supports increasing representation for Californians facing legal problems affecting their homes, family, safety, and citizenship status. Legal services programs should set priorities and establish criteria for representation to maximize the effectiveness of any new funding for increased legal representation of the poor.</p> <p>Is concerned that it may be premature to study the design of a pilot program at this time. Urges the State Bar to monitor the Washington program and collect information not only from the future LLLTs and their clients, but also from the legal aid programs that may hear anecdotally about any problems in their communities.</p> <p>Any future discussion of a pilot program must address that concern that that LLLTs may be hesitant to refer to a legal aid program if the LLLT does not want to lose the income or if the LLLT does not recognize the complexity of the case early enough</p>	<p>Supports court, bar and legal services coordination</p> <p>Supports increased representation of the poor.</p> <p>Concern that LLLTs pilot is premature and data is lacking</p>

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27.	05/11/15	Salena Copeland, Executive Director, Legal Aid Association of California (Continued)	<p>Concerned that legal services representatives are not included as representatives in this short list on re-engineering a pilot project, perhaps in landlord-tenant to explore how the system could be redesigned and streamlined.</p> <p>LAAC is in support of continued exploration of the “navigator” idea, but would recommend that the Bar wait for the first full evaluation of the New York navigator programs.</p> <p>Generally in support of all the law school debt recommendations, as we believe that it is important both that prospective law students better understand the financial impact of undertaking a law school education and that law school graduates have support and information in paying off their loans.</p> <p>Concerned about the recommendation that potentially links law student debt to misconduct.</p>	<p>Concern about the exclusion of legal services in re-engineering</p> <p>Supports navigators</p> <p>Supports law school debt recommendations</p> <p>Concern about linkage of debt to misconduct</p>
28.	05/11/15	Elizabeth Olvera	Supports a program that licenses paralegals to practice limited law as an extension of the existing Legal Document Assistance requiring 2 years of LDA experience or successful completion of a LDA training program from a post-secondary accredited school that includes family law, unlawful detainers, bankruptcy, and trusts and estates from a post-secondary accredited school and annual mandatory MCLE hours, including on experiential course.	Supports LLLTs

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29.	05/11/15	Craig Saito, JD, Ed.D, Chair Faculty & Curriculum Committee, Peoples College of Law	Supportive of the Board of Trustees' approval of a Limited License Legal Technician program. A limited scope representation program would greatly assist their graduates in carrying the out the mission of the Peoples College of Law	Supports LLLTs
30.	05/11/15	Lisa B. Vessels, National Federation of Paralegal Associations	<p>NFPA supports the recommendations to create a limited license legal technician (LLLT) pilot program, limited to one subject matter area.</p> <p>NFPA supports the recommendation of input from the California Supreme Court to address how to handle governance, oversight and licensure, but would also recommend engaging paralegal professional associations for their input.</p> <p>NFPA supports the creation of a separate board to oversee the operational details which includes paralegals and paralegal educators as essential to efficient implementation should the creation of the LLLT profession move forward in California.</p>	<p>Supports LLLTs</p> <p>Opposes SB oversight of LLLTs</p>

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31.	05/11/15	Mary Sessmon, Cuamacaya College	<p>Request that existing paralegal programs be provided an opportunity to be heard on the issue of education and training for any such proposal for the design of a pilot program for the governance, licensing, and oversight of LLLTs.</p> <p>Existing paralegal programs provide quality education for any proposed LLLT training they can do so in a cost effective manner.</p>	Supports LLLTs & paralegal curriculum
32.	05/12/15	Eric Garcia President, College Liaison, Sacramento Valley Paralegal Association (SVPA)	SVPA supports the development of a pilot limited licensing program, and would be happy to provide any assistance needed to develop the program.	Supports LLLTs
33.	05/15/15	Yolanda Jackson, Executive Director Justice & Diversity Center of the Bar Association of San Francisco (JDC)	<p>Concerned with "New" Group's recommendation on LLLTs because there is no data yet available on the helpfulness of a LLLT in Washington to clients.</p> <p>Monitor the Washington program and collect information from the LLLTs, clients and legal services providers, including available data on mistakes made and any adverse outcomes to LLLT clients.</p> <p>Focus on supporting, developing, and evaluating its initiatives focused on equal access to justice and quality legal representation, rather than creating a two-tier legal services system.</p>	Opposes LLLTs

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33.	05/15/15	Yolanda Jackson, Executive Director Justice & Diversity Center of the Bar Association of San Francisco (JDC) (Continued)	As contemplated in the report, LLLTs will not require direct attorney supervision, so there is concern that some LLLTs may not recognize the complexity of a case early enough and inadvertently position a litigant for failure at his or her court appearance. Rather than utilizing LLLT services those litigants with cases in those subject matters should at the onset receive services from a licensed attorney.	Opposes LLLTs