

Attachment C
Proposed Changes to MCLE Rules - Public Comment Summary

1. 9/20/2013 Thomas M. Curry Attorney
Supports increase in MCLE hours.
2. 9/9/2013 Joint statement from 12 attorneys Trial Court Attorneys
Trial court attorneys and trial court research attorneys are judicial branch employees and should be exempt from MCLE requirements. Opposes increase in MCLE hours.
3. 9/9/2013 Pamela J. Jester, CEB Provider
Supports changes to MCLE Provider Rules, increase in MCLE hrs, increase in ethics hours and addition of LPMT option to ethics requirement.
4. 9/6/2013 Leeanna Izuel, USC Gould Provider
Supports definitions of participatory and self-study credit, addition of LPMT option to ethics requirement, increase of hours, and expansion of bias definition. Opposes written material requirement for courses one hour or less in length. Suggests limit to the number of individuals to audit a provider per year.
5. 9/6/2013 Daniel Kroll, Superior Court Trial Court Attorney
Trial court attorneys and trial court research attorneys are judicial branch employees and should be exempt from MCLE requirements. Opposes increase in MCLE hours.
6. 9/6/2013 James P. Menton, Business Law Section Provider
Recommends that other activities including pro bono satisfy MCLE requirement. Requests further study on the increase of MCLE hours. Questions the increase of ethics hours to include LPMT. Requests clarification to Auditor costs and suggests change to the written rule.
7. 9/6/2013 Jeffry C. Radding Attorney
Goal of the MCLE program need to be defined. Inquiring justification for increase in MCLE hours. Opposes written material requirement for courses one hour or less in length.
8. 9/6/2013 Angela L. Ball Trial Court Attorney
Trial court attorneys and trial court research attorneys are judicial branch employees and should be exempt from MCLE requirements. Opposes increase in MCLE hours.

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9. 9/5/2013 Marcella O. McLaughlin, SDCBA Provider
Requests clarification of courses in LPMT. Suggest Auditors are familiar with MCLE rules and procedures. Opposes written material requirement for courses one hour or less in length.
10. 9/5/2013 Joint statement from 3 attorneys Trial Court Attorneys
Trial court attorneys and trial court research attorneys are judicial branch employees and should be exempt from MCLE requirements. Opposes increase in MCLE hours.
11. 9/5/2013 Audrea Golding, Council on Access & Fairness COAF
Recommends expanding bias requirement to 3 hours or more with a focus on in the profession and practice of law.
12. 9/5/2013 Salena Gopeland, Legal Aid Assoc. of CA LS Agency
Supports expansion of bias to include bias within society. Concerned “competency issues” opposes goals of eliminating bias and that courses which focus on mental and physical issues “obscure best practices for working with people with disabilities”. Recommends an amendment to the proposal.
13. 9/5/2013 Vickie Contreras, DCSS Provider
Acceptable methods of participatory attendance verification should be provided. Self-study activity definition should be included in Rule 2.51 (G).
14. 9/5/2013 Sheila Dillard Trial Court Attorney
Trial court attorneys and trial court research attorneys are judicial branch employees and should be exempt from MCLE requirements. Opposes increase in MCLE hours.
15. 9/5/2013 Joy Lazo Trial Court Attorney
Trial court attorneys and trial court research attorneys are judicial branch employees and should be exempt from MCLE requirements. Opposes increase in MCLE hours.
16. 9/4/2013 Wei C. Wong Attorney
Opposes increase to MCLE hours. Opposes MCLE in substance abuse. Suggests study of the problems that MCLE attempts to address to better fix the issue.
17. 9/4/2013 Janice Y. Fukai, L.A. County Alt Pub Def Provider
Opposes expiration date on self-study materials. Object auditor attendance where privileged information is shared. Request clarification on how courses on ethics, bias and competence issues would be credited.

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18. 9/4/2013 Erin Orzel Trial Court Attorney
Trial court attorneys and trial court research attorneys are judicial branch employees and should be exempt from MCLE requirements. Opposes increase in MCLE hours.
19. 9/4/2013 Tricia Ada Trial Court Attorney
Trial court attorneys and trial court research attorneys are judicial branch employees and should be exempt from MCLE requirements. Opposes increase in MCLE hours.
20. 9/3/2013 Monique G. Morales Trial Court Attorney
Trial court attorneys and trial court research attorneys are judicial branch employees and should be exempt from MCLE requirements. Opposes increase in MCLE hours.
21. 9/3/2013 Ed McPherson Attorney
Opposes increase in MCLE hours.
22. 9/3/2013 Joint statement from 6 attorneys Trial Court Attorneys
Trial court attorneys and trial court research attorneys are judicial branch employees and should be exempt from MCLE requirements. Opposes increase in MCLE hours.
23. 9/2/2013 David L. Hagan Attorney
Opposes increase in MCLE hours. Concerned about the cost to solo & small firms. Proposed increase of ethics hours will not produce more ethical attorneys. Bias education does not eliminate the presence of bias. Concerned that "Competence issues" refers to physical and mental issues and detracts from education on substance abuse.
24. 9/2/2013 Perry L. Segal Attorney
Supports addition of LPMT option to ethics requirement.
25. 9/2/2013 Perry L. Segal, LPMT Section Provider
The Bar should offer low cost/free MCLE to subsidize the cost from increasing the number of MCLE programs. Supports addition of LPMT option to ethics requirement.
26. 8/31/2013 Cynthia Hindler Attorney
Opposes mandatory education requirement and changes to the MCLE rules. Questions if increase in hours improves the quality of attorneys.

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27. 8/30/2013 John Hager Attorney
Opposes increase in MCLE hours and the requirements for bias and substance abuse.
28. 8/30/2013 Beau Sterling Davis Attorney
An increase in MCLE hours should be subsidized with free MCLE. This will help those with financial hardship and young lawyers.
29. 8/30/2013 Jane E. Heath Attorney
Reflect proposed increase in MCLE hours in the Rule of Court.
30. 8/30/2013 Christopher J. Duenow Attorney
Supports all changes to the requirements with exception of written material requirement for courses one hour or less in length.
31. 8/30/2013 Marc Epstein Attorney
Opposes change in current MCLE requirements, specifically opposes increase in MCLE hours and written material requirement for courses one hour or less in length.
32. 8/30/2013 Jack Cohen Attorney
Opposes increase in MCLE hours as per SB 144.
33. 8/30/2013 Jennifer D. McMahan Trial Court Attorney
Trial court attorneys and trial court research attorneys are judicial branch employees and should be exempt from MCLE requirements. Opposes increase in MCLE hours.
34. 8/29/2013 Julia Wilson, One Justice LS Agency
Supports addition of LPMT option to ethics requirement. Supports expanding bias category to include bias within society.
35. 8/29/2013 Lisa M. Fugazi Trial Court Attorney
Trial court attorneys and trial research attorneys are judicial branch employees and should be exempt from MCLE requirements. Opposes increase in MCLE hours.
36. 8/29/2013 Jeanette Gerlomes Trial Court Attorney
Trial court attorneys and trial research attorneys are judicial branch employees and should be exempt from MCLE requirements. Opposes increase in MCLE hours.

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37. 8/28/2013 William Carroll Attorney
Proposes amendment to Rule 9.31 exempting superior court attorneys from MCLE requirement.
38. 8/27/2013 Kelly Emling, Exec Ofc L.A. County Pub Def Provider
Requests clarification of courses in LPMT. Suggest Auditors are familiar with MCLE rules and procedures. Opposes written material requirement for courses one hour or less in length.
39. 8/26/2013 CA Bankruptcy Forum Provider
Expressed concerns regarding cost associated with provider verifying attendance. Suggests member submit a handwritten sign in form of the "Official Record of Attendance" to be kept on record and available for audit.
40. 8/26/2013 CA Receivers Forum State Board of Directors Provider
Expressed concerns regarding cost associated with provider verifying attendance. Suggests member submit a handwritten sign in form of the "Official Record of Attendance" to be kept on record and available for audit.
41. 8/26/2013 Ann Marie Ruskin, NCSEA Provider
Requested clarification of the written material requirement for courses one hour or less in length. No opposition to provider attendance at Annual Meeting.
42. 8/24/2013 Rousell, Kulich, Reus, & Calero, CYLA Board CYLA
Supports MCLE course auditors to improve the quality of education and promote public protection. CYLA Board enthusiastic to serve as auditors.
43. 8/22/2013 Joni Halpern Attorney
Opposes increase in MCLE hours. Concerned about non-in person MCLE, with little interaction from participants and teaching skills of lecturers.
44. 8/21/2013 Robert R. Shiri, West L.A. Amer. Inn of Court Provider
Supports increase to MCLE hours. Opposes written material requirement for courses one hour or less in length. Opposes provider attendance at training/Annual Meeting.
45. 8/21/2013 James J. Preis, Mental Health Advocacy Service LS Agency
Requests that the word "physical" be deleted from the proposed definition of the bias requirement. Does not want mental or developmental disability to be excluded from or referenced different from bias related to physical disability.

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46. 8/21/2013 Vern Schooley, American Inns of Court Provider
Supports increase to MCLE hours. Suggest 3 hours ethics and minimum of 6 hours (with LPMT component). Opposes bias as a specialty requirement. Opposes provider attendance at Training/Annual Meeting.
47. 8/21/2013 Demosthene Lorandos, PhD Provider
Complaint regarding the method of reviewing and certifying qualified MCLE courses.
48. 8/20/2013 John S. Warnlof Attorney
Supports increase to MCLE hours. Suggests rewording of “competence issues” requirement “impairs a member’s ability to competently perform legal services”.
49. 8/19/2013 Jamie R. Schloss Attorney
Opposes increase in MCLE hours and ethics requirement. Believes no impact on attorney conduct and knowledge of ethics is basic.
50. 8/17/2013 William B. Dixon Attorney
Opposes increase in MCLE hours.
51. 8/17/2013 Michael D. Senneff, Sonoma Cnty Lawyers Club Provider
Opposes written material requirement for courses one hour or less in length.
52. 8/16/2013 Bruce Monroe Attorney
Opposes increase to MCLE hours. Supports written material requirement for courses one hour or less in length, expansion of “substance abuse” to “competence issues” and providing a process for complaints re providers.
53. 8/16/2013 Carol Levitt, Internet for Lawyers Provider
Concern regarding expiration date on self-study materials. Supports addition of LPMT option to ethics requirement. Asks for consideration that marketing classes be approved. Opposes provider attendance at Training/Annual Meeting.
54. 8/15/2013 Phyllis M. Hix, Indian Wells Valley Bar Assoc. Provider
The proposed bias definition, which includes “society” is too broad. Attorneys should not diagnose mentally ill as referenced in proposed “competence issues” requirement. Course auditors would increase cost of courses, which will be borne by attorneys attending the courses.
55. 8/15/2013 Kelly Jenkins Attorney
Opposes increase in MCLE hours.

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56. 8/15/2013 Mara A. Weinstein, C.P.R. Provider
No opposition to provider attendance at Annual Meeting. Prefers to attend mandatory meeting electronically.
57. 8/15/2013 Cheryl Kessler, Vantage Point Advisors Provider
No opposition to provider attendance at Annual Meeting. Prefers to attend mandatory meeting electronically.
58. 8/15/2013 Robert Kopelson Attorney
Suggests increase of MCLE hours to 30. Opposes bias requirement and increase of hours to ethics requirement.
59. 8/14/2013 Michael W. Perna Attorney
Opposes increase in MCLE hours as it discriminates against older lawyers. If an increase is implemented the State Bar should provide no cost MCLE programs.
60. 8/14/2013 Wendy Woo Attorney
Requests alternative requirements for attorneys active but not practicing law.
61. 8/14/2013 Michael Benner, CEU Institute Provider
Out of state provider. Requested clarification of the proposed changes to provider rules and material requirement. No opposition to provider attendance at Annual Meeting. Prefers to attend mandatory meeting electronically.
62. 8/14/2013 Brian J. Purtill Attorney
Supports all proposed MCLE Rule Revisions with exception of written material requirement for courses one hour or less in length.
63. 8/13/2013 Sam Frazier Attorney
Opposes increase in MCLE hours, challenges efficacy of MCLE on substance abuse and bias.
64. 8/13/2013 Bart Lee Attorney
Suggests eliminating MCLE requirement. Opposes bias requirement. Ethics courses to reinforce fiduciary training is beneficial. Questions efficacy of substance abuse requirement. Requests Bar look into giving credit for pro bono work and alternative activities.
65. 8/13/2013 Dawn M. Ross Provider
Opposes written material requirement for courses one hour or less in length.

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66. 8/13/2013 Everett Kavanaugh Attorney
Opposes increase in MCLE hours. Suggests elimination of MCLE on substance abuse and bias. Requests no increase to ethics hours.
67. 8/12/2013 Jamey Cohen, Ziffren Brittenham LLP Provider
Opposes increase to MCLE hours, change to the ethics requirement and written material requirement for courses one hour or less in length. Supports inclusion of LPMT requirement and of clarification of participatory and self-study activities.
68. 8/12/2013 Martha Rosenberg, Legal Aid Society, CC Cnty Provider
Suggests provision regarding consideration of the response to attendee complaints of providers.
69. 8/12/2013 George W Brewster, Jr., Ofc Cnty Counsel, SD Provider
Requests same cost exemption from MCLE provider renewal fee. No opposition to provider attendance at Annual Meeting. Prefers to attend mandatory meeting electronically.
70. 8/12/2013 Nuala Coogan, SFL Data Provider
Requests clarification of written material requirement for courses one hour or less in length.
71. 8/12/2013 Barbara Gallagher Attorney
Opposed to written material requirement for courses one hour or less in length. Concerned about the impact on high quality programming.
72. 8/12/2013 Clay Clement Attorney
Opposed to written material requirement for courses one hour or less in length.
73. 8/12/2013 Christopher G. Costin, Beyers Costin Provider
Opposed to written material requirement for courses one hour or less in length.
74. 8/12/2013 James Heiting Attorney
Concerned that “competence issues” is proposed to replace “substance abuse”. The issue of substance abuse is important to deserve its own MCLE requirement. Suggests “competence issues” better placed with proposed 8 hour ethics requirement with option of LPMT.
75. 8/12/2013 Hal Reniger, Mackinac Strategies Provider
No opposition to provider attendance at Annual Meeting. Prefers to attend mandatory meeting electronically.

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76. 8/9/2013 Alan Cohen, Abacus MCLE Solutions Provider
Opposes increase in MCLE hour and to written material requirement for courses one hour or less in length. New requirements will cause many providers to drop out. Opposes provider attendance at Annual Meeting. Prefers to attend mandatory meeting electronically.
77. 8/9/2013 Tim Riley Provider
Supports proposed revisions to the MCLE rules. No opposition to provider attendance at Annual Meeting. Prefers to attend mandatory meeting electronically.
78. 8/9/2013 Michael D. Schwartz Attorney
Inquiry that self-study include listening to course via CD/DVD as electronic. Suggests reducing the Ethics/LPMT requirement to total 4 hours. Supports the proposed change to "bias" to include "and society". Supports proposed "competence issues"
79. 8/9/2013 Linda Temkin, San Fernando Valley Bar Assoc. Provider
Supports the LPMT option to the Ethics requirement. Supports the proposed change to "bias" to include "and society". Supports requirement for provider attendance at Annual Meeting.
80. 8/9/2013 Robert W. Peterson Attorney
Opposed to written material requirement for courses one hour or less in length. Opposes provider attendance at Annual Meeting/Compliance course.
81. 8/9/2013 Frank C. Griffin, Phuego Corp Provider
Supports requirement for provider attendance at Annual Meeting.
82. 8/7/2013 Deborah Schulte Attorney
Opposes increase in MCLE hours. Suggests an increase to the specialty requirement hours and decrease to general requirement.
83. 8/7/2013 Jocelyn Wong-Rolle Attorney
Opposes increase in MCLE hours.
84. 8/6/2013 Janet Fairchild Attorney
Opposes increase in MCLE hours. Concerned about cost impact on solo practitioners.

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85. 8/6/2013 Kristin N. Casey Attorney
Opposes proposed expanded course requirements for “substance abuse” and “elimination of bias”.
86. 8/5/2013 Mary K. Jones Attorney
Suggests proposed “competence issues” which addresses mental impairment be changed to recognizing mental impairment. Suggests courses be developed in mental competence in order to train attorneys to recognize mental impairment.
87. 8/4/2013 Henry Doering Attorney
Supports increase in MCLE hours.
88. 8/3/2013 Gerald McNally Attorney
Opposes substance abuse/mental illness requirement.
89. 8/3/2013 Nadine L. Scott Attorney
In general support of proposed changes to the MCLE rules with the exception of an increase in MCLE hours. Concerned about the costs associated with an increased requirement.
90. 8/3/2013 Alan Conroy Attorney
Inquires evidence that MCLE requirement improves the practice of law.
91. 8/2/2013 Michael Harrison Attorney
Opposes “substance abuse/mental illness requirement, written material requirement for courses one hour or less in length, bias and ethics requirement. Inquires reason for proposed increase in MCLE hour requirement (i.e. a decrease in the quality of legal services).
92. 8/2/2013 Timothy Lee Davis Attorney
Opposes written material requirement for courses one hour or less in length. Supports proposed change to MCLE rules that allow complaints against providers.
93. 8/2/2013 Frank Maul Attorney
Opposes proposed revision to “bias” requirement which includes “society”, which believes is political in nature.
94. 8/2/2013 Jayna Karpinski-Costa Attorney
Questions need for specialty requirements for non-practicing Attorneys. Request that the MCLE requirement relate to the attorney’s needs and area of practice.

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95. 8/2/2013 Joel A. Biatch Attorney
Suggests that MCLE courses on substance abuse include what attorneys who identify fellow attorneys with abuse issues should do to protect clients and their duty to report to the Bar or others.
96. 8/1/2013 Larry Lichtenegger Attorney
Concerned about the cost of MCLE requirements for more senior attorneys. Request to reduce requirements for retired attorneys over 70 with an income of under \$100,000.
97. 8/1/2013 Jon Hartung Attorney
Opposes increase in MCLE hours and written material requirement for courses one hour or less in length. Supports proposed LPMT option to the ethic requirement, and including "competence issues" to the substance abuse/mental illness requirement.
98. 8/1/2013 James Prosser Attorney
Supports expansion of the area of specialty courses. Suggests that the Bar review SB 144 reducing the number of MCLE hours and explain the need to increase the hours.
99. 8/1/2013 James A. Haverkamp Attorney
Opposes increase in MCLE hours, written material requirement for courses one hour or less in length and increase to the number of ethics hours
100. 8/1/2013 Douglas E. White Attorney
MCLE requirement should be eliminated.
101. 8/1/2013 Martin Perlberger Attorney
MCLE hours and specialty requirements should be reduced.
102. 8/1/2013 Jolsna M. John Attorney
Supports expansion of the substance abuse/mental illness and bias requirements. Opposes increase in MCLE hours, audit of MCLE courses and written material requirement for courses one hour or less in length.
103. 8/1/2013 David Chudnow Attorney
Opposes changes to MCLE program with the exception of the LPMT as an option to the ethics requirement.

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104. 8/1/2013 Edward D. Johnson Attorney
Opposes expansion of the substance abuse/mental illness requirement and the bias requirement. Questions the reason to increase the number of MCLE hours.
105. 8/1/2013 Kathleen DeSantis Attorney
Opposed to written material requirement for courses one hour or less in length.
106. 8/1/2013 Judith Dornstein Attorney
Opposes increase in MCLE hours. Concerned about the cost to solos and small firms. Opposes solo practitioners taking courses on LPMT, bias and substance abuse. Substance abuse should be required of those with a problem.
107. 7/30/2013 Joanne Williamson Attorney
Suggests MCLE exemption should extend to full time employees of the State of California, who do not otherwise practice law.
108. 7/29/2013 Gina Roers Attorney
Requesting clarification of the rules.
109. 7/29/2013 Jerome I. Braun Attorney
Concerned that “competence issues” is proposed to replace “substance abuse”. MCLE on substance abuse should not be diluted.
110. 7/20/2013 Michael Millman Attorney
Proposes MCLE requirement be eliminated. Supports re-establishing law libraries to assist attorneys in their area of specialization.
111. 7/1/2013 Joint statement from 14 Bar Associations Providers
Propose increase to the “bias” requirement to three hours and limit it to legal practice.