

ATTACHMENT C

Additional Comments Received on Proposed Amendment to State Bar Rule 2.15 Fee Scaling for Employees of IOLTA Recipient Organizations.

All the following comments are in favor of the proposed amendment.

Organization	Excerpts
Alameda County Bar Association Volunteer Legal Services Corporation	Broadening Rule 2.15 to include part-time legal aid attorneys would address complex resource and funding needs of legal services programs and lessen the burden on the legal services attorneys who are working to provide access to justice in our communities.
Disability Rights California Disability Rights Education & Defense Fund Disability Rights Legal Center Legal Aid Society – Employment Law Center	<p>...there is an additional disability civil rights reason for the State Bar to formally modify Rule 2.15 to permit dues scaling for part-time attorneys. We offer this disability-focused comment as IOLTA-funded organizations nationally recognized for our expertise in federal and state disability civil rights laws.</p> <p>Both federal and California law expressly contemplate part-time work as a form of reasonable accommodation to disability.</p> <p>By expressly recognizing and addressing the prospect of part-time employment, the proposed modification of Rule 2.15 will facilitate the accommodation and continued employment of attorneys with disabilities by IOLTA-funded employers covered by disability employment nondiscrimination mandates.</p>
Los Angeles Center for Law and Justice	As legal services organizations' budgets are cut, many previous full-time attorneys may now be part-time attorneys. Allowing the 25% reduction for part-time employees who work at least 50% and who do not have additional legal income allows the programs who pay those dues to save money that can be allocated to client services.
National Housing Law Project	Any attorney working for an IOLTA Recipient Organization who is not otherwise employed in a legal capacity and for whom the organization pays bar dues should be eligible to scaled fees regardless of the number of hours that person works for the organization.

Comment letters available upon request.