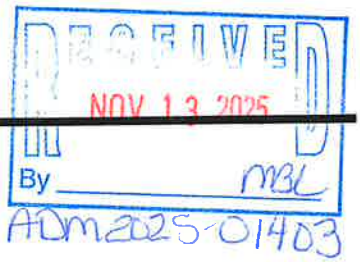
MaryBeth Lindsey



From: Gary Massey <gmassey@masseyattorneys.com>
Sent: Thursday, November 13, 2025 8:56 AM
To: appellatecourtclerk
Subject: No. ADM2025-01403 - Comments on Regulating the Legal Profession

Warning: Unusual sender
You don't usually receive emails from this address. Make sure you trust this sender before taking any actions.

COMMENT TO THE TENNESSEE BOARD OF PROFESSIONAL RESPONSIBILITY
RE: Question 5 - Non-Lawyer Ownership and Fee Sharing Regulations

FROM: Gary Massey, BPR 19490

DATE: November 13, 2025

I write to respectfully urge the Board to maintain and strengthen existing prohibitions against non-lawyer ownership of law firms and fee sharing with non-lawyers. Far from liberalizing these rules, the Board should vigilantly guard against current schemes designed to circumvent these essential protections.

I. THE PRACTICE OF LAW MUST REMAIN INDEPENDENT OF NON-LAWYER FINANCIAL INTERESTS

The prohibition against non-lawyer ownership exists to preserve the attorney's paramount duty of loyalty to the client. When non-lawyer investors hold ownership stakes in law firms, an inherent and irreconcilable conflict arises: attorneys owe fiduciary duties to both their clients and their investors. These duties inevitably clash when investor profits depend upon maximizing billable hours, settling cases prematurely to reduce costs, or declining to pursue meritorious but resource-intensive claims.

Unlike attorneys, non-lawyer investors bear no professional or ethical obligations to clients. They face no disciplinary consequences for placing profit above client interests. Permitting such ownership would fundamentally transform the practice of law from a profession serving justice into a commercial enterprise serving shareholders.

II. CLIENT CONFIDENTIALITY AND PRIVILEGE ARE JEOPARDIZED BY NON-LAWYER INVOLVEMENT

The attorney-client privilege and duty of confidentiality form the bedrock of effective legal representation. Non-lawyer owners would necessarily gain access to confidential client information in exercising their ownership prerogatives—reviewing financial performance, evaluating case strategies, and making management decisions. Yet these individuals lack the ethical training, professional obligations, and disciplinary oversight that govern attorneys' handling of confidential information.

Once privilege is shared with non-lawyer owners acting in their business capacity rather than as agents of the attorney, the privilege may be waived or compromised. This places clients' most sensitive information at risk and undermines the trust essential to the attorney-client relationship.

III. THE PROFESSIONAL JUDGMENT OF ATTORNEYS MUST NOT BE SUBORDINATED TO BUSINESS INTERESTS

An attorney's exercise of independent professional judgment is not merely preferable—it is mandatory under our Rules of Professional Conduct. Non-lawyer ownership creates a structural impediment to this independence. When business managers who lack legal training make decisions affecting case handling, resource allocation, or settlement recommendations based on profit margins rather than legal merit, the attorney's professional judgment becomes subordinate to commercial considerations.

This concern is not hypothetical. In jurisdictions that have experimented with alternative business structures, evidence suggests that investor-owned firms prioritize profitability metrics that may conflict with zealous client advocacy, including limiting time spent on cases, pressuring early settlements, and declining complex matters with uncertain outcomes.

IV. EXISTING PROHIBITIONS ARE ALREADY BEING CIRCUMVENTED THROUGH IMPROPER ARRANGEMENTS

The Board should be particularly concerned that sophisticated actors are already exploiting loopholes to achieve the economic equivalent of non-lawyer ownership while maintaining the fiction of compliance. Specifically, arrangements involving "managing agencies" or "administrative service organizations" purport to provide only clerical support and administrative services to law firms. However, these arrangements often result in the law firm paying substantially all of its profits to the managing agency in the form of inflated management fees.

This structure allows private equity investors and other non-lawyer entities to capture the economic value of law firm ownership while technically avoiding direct ownership or fee sharing. The managing agency, controlled by non-lawyers, effectively controls the law firm's finances and operations through its contractual leverage. These are not arms-length service relationships but rather ownership arrangements disguised as service contracts.

Rather than relaxing restrictions on non-lawyer involvement, the Board should clarify that such arrangements violate the spirit and purpose of existing rules and will be subject to disciplinary action. Management fees paid to non-lawyer entities must bear a reasonable relationship to the actual value of administrative services provided and cannot serve as a vehicle for profit-sharing prohibited by Rule 5.4.

V. ACCESS TO JUSTICE CONCERNS CUT AGAINST LIBERALIZATION

Proponents of non-lawyer ownership sometimes argue that outside capital could improve access to justice by providing resources to serve underserved populations. This argument fails on multiple grounds.

First, investor-backed firms seeking returns on capital will naturally gravitate toward profitable matters and clients, not toward serving those with limited means. Private equity investment in law firms will not produce pro bono services or expand access to justice—it will concentrate resources on high-value cases while abandoning modest matters and low-income clients.

Second, existing regulatory frameworks already permit lawyers to structure their practices to pursue capital and growth, including through large firm partnerships and professional corporations. Additional capital infusions from non-lawyers are unnecessary to serve clients effectively.

Finally, access to justice is better served by preserving public trust in the legal profession. Allowing profit-driven non-lawyer ownership risks undermining confidence in attorneys' independence and creating a perception that legal representation is a commodity rather than a professional service.

VI. THE MODEL RULES AND OVERWHELMING MAJORITY PRACTICE SUPPORT MAINTAINING PROHIBITIONS

Tennessee's prohibition on non-lawyer ownership and fee sharing aligns with ABA Model Rule 5.4 and the rules adopted in the vast majority of American jurisdictions. While a small number of states have permitted limited exceptions, these experiments remain largely untested, and their long-term implications for clients and the profession are unknown.

Tennessee should not abandon proven protections for speculative benefits. The prohibition on non-lawyer ownership has served the profession and the public well for generations. No compelling evidence suggests that change is necessary or beneficial.

CONCLUSION

I respectfully urge the Board to:

1. **Maintain** existing prohibitions against non-lawyer ownership of law firms;
2. **Maintain** existing prohibitions against fee sharing with non-lawyers;
3. **Clarify and strengthen** enforcement against arrangements that circumvent these prohibitions, including management service agreements that result in non-lawyer entities receiving substantially all law firm profits; and
4. **Issue guidance** establishing that management fees paid to non-lawyer-controlled entities must bear a reasonable relationship to the fair market value of actual administrative services provided.

The practice of law is a profession, not merely a business. Its regulation must prioritize the protection of clients and the administration of justice over the commercial interests of potential investors. I thank the Board for its consideration of these comments.

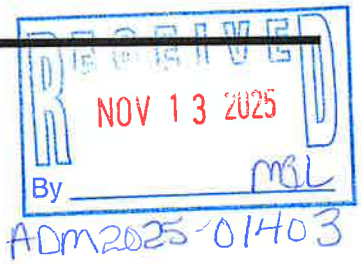
Respectfully submitted,

Gary Massey, Jr., 19490
423-697-4529

masseyattorneys.com

GARY MASSEY
INJURY LAWYERS

MaryBeth Lindsey



From: Michael Kuebler <mikek@kafirm.law>
Sent: Thursday, November 13, 2025 8:31 AM
To: appellatecourtclerk
Subject: Re: Regulatory Reform No. ADM2025-01403

Warning: Unusual sender
You don't usually receive emails from this address. Make sure you trust this sender before taking any actions.

#1 and 2 – An enthusiastic YES
I graduated from Nashville School of Law which is not ABA accredited. I understand indirectly that to meet the ABA accreditation standards; the school would have to spend millions of dollars and that the issues were primarily centered around the size of the library. In my time at NSL, I went into the library one time because an assignment required me to do so. I think NSL has and continues to produce some very good attorneys despite falling below the antiquated and seemingly biased ABA standards.

Tennessee should establish their own accreditation standards and stop relying on the ABA. Going back to the "graduated from a regularly organized law school which has the approval of the Board of Law Examiners" language would be a major improvement.

#3 – Yes and No
While the J.D. programs could use some improvement designed to weed out unethical character, low critical thinking skilled individuals, and create better writers, I believe keeping the Juris Doctorate as the standard would be better.

This said, I have experience with internationally licensed attorneys who have graduated from their own countries law schools and even practiced for various times. The current rules create archaic and punitive hurdles to these individuals to even get a chance to sit for the bar. I would propose rules that allow a better pathway to transition to US law and an opportunity to sit for the exam. Eliminate the "equivalent of a three-year course of study" language and the subjective "substantial equivalent" language. The current rules require the Board to subjectively examine foreign schools and legal systems which has led to, I believe, bias driven decisions. The Board should be unburdened of this task.

A better solution for someone who has received a license to practice law in a foreign country may be to require them to work in a Tennessee law firm for one year and complete a one year online educational program with an established curriculum and testing standards.

#4 – Yes and No
First, an opinion on the UBE - I am NOT a fan. I have hired new attorneys who seem to know nothing about Tennessee law, and it significantly diminishes the service they can providing to clients. I must wonder if the UBE is part of a larger group think designed to steer the law to a uniform standard across all states as the end goal. Meanwhile, my observation is that the UBE is producing attorneys who are not equipped to practice law in this state.

As to admission in another state, I like Georgia's position (as I understand it). I believe they require all admissions to take the "state" portion of their bar exam. As much as I would like to get a Georgia license (I practice on their boarder), I personally do not want to take another exam at 57 years old. However, I know many who have. The hurdle is not that high.

Tennessee should adopt a similar program and alter the bar exam to the prior standards.

#5 – Yes, with limitations
I own in part, 11 businesses currently. Except, of course, for the law firm, I am moving the ownership of those businesses into a revokable trust which I cannot do for the law firm based on the current rules. This is true even though I would control the trust. So, some exceptions like for this situation would be beneficial.

Outside of this specific scenario, I believe having non-owners invest in and benefit from law firm ownership could be good and bad. For example, even if the attorney was required to be in control, I believe it would consolidate many firms into bigger unyielding firms which are purely profit centric rather than client centric. That would not be good. The benefit would be the ability of individuals to leave large firms by taking an investor to create a small or solo practice thus providing more affordable access. That would be good.

A final thought, my observation is that there seems to be a LOT of attorneys. I do not see or feel that there is a shortage of attorneys. The issue is affordability.

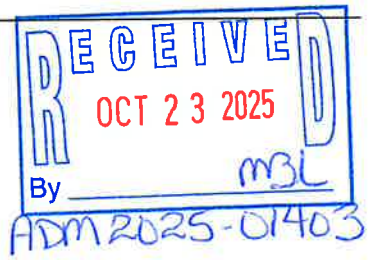
Thanks,
Michael T. Kuebler, Esq.
Kuebler and Associates, PLLC
6223 Airpark Drive, STE 105
Chattanooga, TN 37421
O: 423-285-6434
C: 423-595-1669
F: 423-206-9940
D: 423-206-9943
www.kafirm.law

The Law Office of Olivia Wann & Associates, PLLC

Olivia Wann
olivia@oliviawann.com

Andrea Craig
andrea@oliviawann.com

406 Church Street
Dover, TN 37058
P: (931) 232-4529
F: (931) 919-1314
www.oliviawann.com



October 20, 2025

The Honorable Justices
Administrative Office of the Courts
511 Union Street, Suite 600
Nashville, Tennessee 37219

Dear Honorable Justices of the Supreme Court of Tennessee,

I am writing to respectfully submit my public comment regarding the proposed alternative pathways to admission to the bar under the jurisdiction of the Tennessee Supreme Court. I appreciate the Court's efforts to explore innovative approaches to legal licensure; however, I must express my opposition to the implementation of these alternative pathways.

I have concerns about maintaining the integrity of the legal profession and ensuring consistent standards of competency. With that said, I believe indigent representation could be handled by non-licensed paraprofessionals in criminal matters with the exception of trial (i.e., bond hearings, plea, negotiations, etc.)

While I understand the intent behind these proposals, I believe that the current system of bar admission provides a rigorous and equitable process that ensures all admitted attorneys meet the high standards required to serve the public effectively.

I respectfully urge the Court to reconsider the adoption of these alternative pathways and to prioritize maintaining the integrity and uniformity of the bar admission process in Tennessee.

Thank you for considering my comments on this important matter. Please do not hesitate to contact me if further clarification or discussion is needed.

Sincerely,

Olivia Wann

Kim Meador

From: Gibson, John W, III <john.w.gibson@Vanderbilt.Edu>
Sent: Sunday, October 12, 2025 3:59 PM
To: appellatecourtclerk
Subject: Comment on ADM2025-01403

Warning: Unusual sender <john.w.gibson@vanderbilt.edu>
You don't usually receive emails from this address. Make sure you trust this sender before taking any actions.

Dear Mr. Hivner,

I write as a law student at Vanderbilt and a current ABA student member. I support the Court's consideration of ending reliance on the ABA and exercising independent authority over professional standards.

As an aspiring legal professional, I've been discouraged by the ABA's increasingly political posture, especially its continued defiance of the U.S. Department of Justice and multiple state attorneys general, including Tennessee's, regarding its unlawful DEI-based discrimination. These actions undermine the ABA's credibility as a neutral steward of legal ethics and professional development.

I joined the ABA hoping for practical resources and a commitment to legal excellence. Instead, I've seen an organization more focused on ideological signaling than serving the needs of the legal profession. Tennessee has an opportunity to lead alongside states like Texas and Florida in developing an alternative framework that reflects constitutional values, respects state sovereignty, and restores trust in the rule of law.

Sincerely,

John Gibson
J.D. Candidate
Vanderbilt University
336-500-7627 | john.w.gibson@vanderbilt.edu

Kim Meador

From: Ellen <isueforu@aol.com>
Sent: Tuesday, October 7, 2025 7:52 AM
To: appellatecourtclerk
Subject: ADM2025-01403

Warning: Unusual sender <isueforu@aol.com>

You don't usually receive emails from this address.
Make sure you trust this sender before taking any actions.

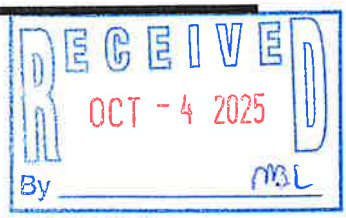
I am writing pursuant to an order soliciting comments. I am opposed to any action by the Supreme Court to reduce requirements for admission to the Bar. I believe such action will not serve the purpose it seeks to achieve, i.e. lower cost access to justice. I believe that such action will result in the targeted groups being taken advantage of and will also result in increased claims and complaints with the Board of Professional Responsibility.

"The court said the goal of the effort is to lower barriers to entry into the profession and ensure availability of affordable legal services in the state while ensuring the competency of attorneys and safeguarding the public." How on earth can this be implemented, achieved and policed? And at what cost? How will the quasi-lawyer's fees be set and policed? We should be elevating the legal profession, not the opposite.

Sincerely,
Ellen E. Fite, Esq.

MaryBeth Lindsey

From: Christopher Dee Jefferson <jeffe007@proton.me>
Sent: Saturday, October 4, 2025 2:07 AM
To: appellatecourtclerk
Subject: Subject line: Comment on Law School Accreditation Reform



ADM2025-01403

Warning: Unusual sender
You don't usually receive emails from this address. Make sure you trust this sender before taking any actions.

I write as a licensed atty in Alabama to express my support that y'all eradicate the ABA from any reference in rules or application. As an organization they are useless and seek to only cause strife and cost increases in the legal system. I have been stopped in KY from being able to motion in without exam, even with reciprocating agreements, because I graduated from a non ABA school. Your state too requires me to go back to law school all over again even though I have been an atty in Alabama for almost 15 years if I wish to get a TN license. Even crazier is I am pro hac vice in TN since 2023 but due to your ABA rule, still not able to motion in without exam; yet I have practiced with other TN attys and beaten them in court. The system is broken and purposely exacerbated the costs that in the end hurt not only potential attys, but people like my clients. Enough is enough.

Chris Jefferson /CDJ
2567701175
26321 Jones Springs Dr.
Athens, Al 35613

Kim Meador

From: eric@sitlerlaw.com
Sent: Wednesday, October 1, 2025 6:00 PM
To: appellatecourtclerk
Cc: Johnny C. Garrett; rep.william.lamberth@capitol.tn.gov
Subject: Re: Public Comments on Regulatory Reform (ADM2025-01403)

RECEIVED
OCT 01 2025
By KIM
ADM2025-01403

Warning: Unusual sender <eric@sitlerlaw.com>
You don't usually receive emails from this address. Make sure you trust this sender before taking any actions.

To: James Hivner, Clerk
Tennessee Supreme Court

Re: Public Comments on Regulatory Reform (ADM2025-01403)

Dear Clerk Hivner and Honorable Justices of the Tennessee Supreme Court:

I submit this comment in response to the Court's Order dated September 16, 2025, soliciting feedback on potential regulatory reforms designed to expand access to justice while maintaining the integrity of the legal profession. After careful consideration, I write in **support** of reforms numbered **1, 5, and 7**, and in **opposition** to reforms numbered **2, 3, 4, and 6**.

I am in support of:

1. Reducing Reliance on ABA Accreditation
The Court should modify its reliance on ABA accreditation as the exclusive measure of a law school's adequacy. While accreditation serves as a quality benchmark, it is also costly and slow to adapt to innovations in legal education. Tennessee's Board of Law Examiners is capable of establishing rigorous standards tailored to the needs of Tennesseans. This reform would expand opportunities for schools to innovate, reduce costs, and increase pathways for competent graduates without sacrificing quality.

5. Promoting Interstate Practice and Mobility
Encouraging greater reciprocity and easing barriers for attorneys licensed in other states will strengthen Tennessee's legal community. Interstate mobility benefits both lawyers and clients, particularly in border regions and underserved rural areas. It also ensures that Tennessee remains competitive and welcoming to legal professionals, thereby expanding access to legal services statewide.

7. Reevaluating Non-Lawyer Ownership of Law Firms
Carefully reducing restrictions on non-lawyer ownership and fee sharing has the potential to foster innovation and expand resources for client services. Outside investment could lower costs, increase technological development, and improve service delivery, especially for middle- and low-income Tennesseans. With proper safeguards to preserve attorney independence and client confidentiality, this reform could meaningfully address the justice gap.

I am in opposition of:

2. Alternatives to ABA Accreditation
While I support reducing strict reliance on ABA accreditation (Issue 1), I oppose replacing it with untested or vague alternatives. Accreditation—whether ABA or state-approved—remains essential to protect the public from

diploma mills or programs offering inadequate training. Without a structured, vetted system, the risk of underprepared attorneys harming clients is too great.

3. Less Costly Alternatives to Three-Year Law School
Although affordability is a critical concern, shortening or diluting the traditional curriculum undermines preparation for practice. The three-year program ensures that graduates gain the analytical, procedural, and ethical grounding necessary for competent practice. Cost concerns should be addressed through tuition reform, scholarships, and state-supported aid—not by lowering the quality or duration of legal education.

4. Alternative Pathways to Licensure (e.g., Apprenticeships or Legal Aid Service in Place of Exams/Education)
While experiential learning is valuable, substituting apprenticeships or limited service for formal education and examination risks producing practitioners unprepared for the wide-ranging demands of modern practice. Bar examinations and rigorous education remain vital for ensuring minimum competence across diverse areas of law. These pathways should supplement—not replace—the traditional requirements.

6. Expansion of Paraprofessional Roles
I oppose transferring core legal functions to paraprofessionals. While well-intentioned, this creates a two-tiered system of justice where low-income clients may be relegated to second-class representation. The practice of law requires not only technical knowledge but also ethical judgment and accountability under professional rules. Paraprofessional licensing could dilute public trust and lead to inconsistent outcomes for vulnerable clients.

In conclusion
I urge the Court to pursue reforms that **lower unnecessary barriers (Issues 1, 5, 7)** while preserving the rigorous standards that protect clients and ensure the competence of Tennessee attorneys (Issues 2, 3, 4, 6). Thoughtful reform should expand access without compromising the professionalism and integrity of the Bar.

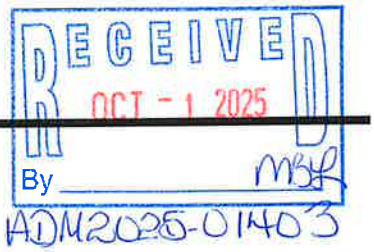
Thank you for considering these comments.

Respectfully submitted,

Eric W. Sitler
Attorney at Law
PO Box 36
Hendersonville, TN 37077
(615) 824-3229

Do not forward this email without permission from the sender. This email is from a law office and may be protected by attorney-client or work product privileges. If you are not the intended recipient of this email or have received this transmission in error, please notify the sender and delete any and all information received immediately.

MaryBeth Lindsey



From: eric@sitlerlaw.com
Sent: Wednesday, October 1, 2025 6:00 PM
To: appellatecourtclerk
Cc: Johnny C. Garrett; rep.william.lamberth@capitol.tn.gov
Subject: Re: Public Comments on Regulatory Reform (ADM2025-01403)

Warning: Unusual sender
You don't usually receive emails from this address. Make sure you trust this sender before taking any actions.

To: James Hivner, Clerk
Tennessee Supreme Court

Re: Public Comments on Regulatory Reform (ADM2025-01403)

Dear Clerk Hivner and Honorable Justices of the Tennessee Supreme Court:

I submit this comment in response to the Court's Order dated September 16, 2025, soliciting feedback on potential regulatory reforms designed to expand access to justice while maintaining the integrity of the legal profession. After careful consideration, I write in **support** of reforms numbered **1, 5, and 7**, and in **opposition** to reforms numbered **2, 3, 4, and 6**.

I am in support of:

1. Reducing Reliance on ABA Accreditation

The Court should modify its reliance on ABA accreditation as the exclusive measure of a law school's adequacy. While accreditation serves as a quality benchmark, it is also costly and slow to adapt to innovations in legal education. Tennessee's Board of Law Examiners is capable of establishing rigorous standards tailored to the needs of Tennesseans. This reform would expand opportunities for schools to innovate, reduce costs, and increase pathways for competent graduates without sacrificing quality.

5. Promoting Interstate Practice and Mobility

Encouraging greater reciprocity and easing barriers for attorneys licensed in other states will strengthen Tennessee's legal community. Interstate mobility benefits both lawyers and clients, particularly in border regions and underserved rural areas. It also ensures that Tennessee remains competitive and welcoming to legal professionals, thereby expanding access to legal services statewide.

7. Reevaluating Non-Lawyer Ownership of Law Firms

Carefully reducing restrictions on non-lawyer ownership and fee sharing has the potential to foster innovation and expand resources for client services. Outside investment could lower costs, increase technological development, and improve service delivery, especially for middle- and low-income Tennesseans. With proper safeguards to preserve attorney independence and client confidentiality, this reform could meaningfully address the justice gap.

I am in opposition of:

2. Alternatives to ABA Accreditation

While I support reducing strict reliance on ABA accreditation (Issue 1), I oppose replacing it with untested or vague alternatives. Accreditation—whether ABA or state-approved—remains essential to protect the public from diploma mills or programs offering inadequate training. Without a structured, vetted system, the risk of underprepared attorneys harming clients is too great.

3. Less Costly Alternatives to Three-Year Law School

Although affordability is a critical concern, shortening or diluting the traditional curriculum undermines preparation for practice. The three-year program ensures that graduates gain the analytical, procedural, and ethical grounding necessary for competent practice. Cost concerns should be addressed through tuition reform, scholarships, and state-supported aid—not by lowering the quality or duration of legal education.

4. Alternative Pathways to Licensure (e.g., Apprenticeships or Legal Aid Service in Place of Exams/Education)

While experiential learning is valuable, substituting apprenticeships or limited service for formal education and examination risks producing practitioners unprepared for the wide-ranging demands of modern practice. Bar examinations and rigorous education remain vital for ensuring minimum competence across diverse areas of law. These pathways should supplement—not replace—the traditional requirements.

6. Expansion of Paraprofessional Roles

I oppose transferring core legal functions to paraprofessionals. While well-intentioned, this creates a two-tiered system of justice where low-income clients may be relegated to second-class representation. The practice of law requires not only technical knowledge but also ethical judgment and accountability under professional rules. Paraprofessional licensing could dilute public trust and lead to inconsistent outcomes for vulnerable clients.

In conclusion

I urge the Court to pursue reforms that **lower unnecessary barriers (Issues 1, 5, 7)** while preserving the rigorous standards that protect clients and ensure the competence of Tennessee attorneys (Issues 2, 3, 4, 6). Thoughtful reform should expand access without compromising the professionalism and integrity of the Bar.

Thank you for considering these comments.

Respectfully submitted,

Eric W. Sitler
Attorney at Law
PO Box 36
Hendersonville, TN 37077
(615) 824-3229

Do not forward this email without permission from the sender. This email is from a law office and may be protected by attorney-client or work product privileges. If you are not the intended recipient of this email or have received this transmission in error, please notify the sender and delete any and all information received immediately.

RECEIVED
OCT - 1 2025
By MBL
ADM2025-01403

Tennessee Supreme Court

Public Comment on Regulatory Reform of the Legal Profession
Docket No. ADM2025-01403

Submitted by:
Curtis S. Berkley
3958 Gordon Smith Rd.
Knoxville, TN 37938
(865)803-3423
cberkley@wintn.com

October 01, 2025

Executive Summary

Core Recommendation
Adopt an alternative pathway to full bar admission based on:

1. Foundational Legal Education – completion of a core curriculum in basic legal principles (Constitutional law, contracts, torts, criminal law, civil procedure, and ethics) through state-approved programs, apprenticeships, or distance learning.

2. First-Year Competency Examination ("Baby Bar") – demonstration of mastery of fundamentals prior to supervised practice.

3. Supervised Practice – two years under the direction of a licensed Tennessee attorney or judge, with reporting and oversight.

4. Portfolio Review – submission of work products for evaluation by the Board of Law Examiners to confirm competence, ethics, and character.

Positions on Specific Issues
• ABA Accreditation: Oppose exclusive reliance. Approve multiple educational avenues so long as core principles are taught.
• Admission of Attorneys from Other States: Oppose. Reciprocity will not increase service to the indigent or underrepresented.
• Non-Lawyer Ownership / Fee Sharing: Oppose. Such measures would primarily advance corporate interests, not access to justice.
• Paraprofessional Licensure: Oppose. One is either a lawyer or is not; partial licensure creates inequity and public confusion.
• Less-Costly Alternatives: Strongly support via the proposed core curriculum + Baby Bar + supervised practice + portfolio model.

Conclusion
Tennessee should modernize its regulatory framework to expand opportunity without diluting standards. The proposed pathway ensures a sound educational foundation, verified knowledge,

extensive supervised training, and competency-based evaluation—without requiring three years of law school or a single high-stakes exam.

Respectfully submitted,
Curtis S. Berkley

Curtis S. Berkley
3958 Gordon Smith Rd.
Knoxville, TN 37938
(865)803-3423
cberkley@wintn.com

October 01, 2025

Clerk James Hivner
Re: Regulatory Reform, Docket No. ADM2025-01403
100 Supreme Court Building
401 7th Avenue North
Nashville, TN 37219
Email: appellatecourtclerk@tncourts.gov

Re: Public Comment on Regulatory Reform of the Legal Profession
Docket No. ADM2025-01403

Dear Clerk Hivner and Honorable Justices:

I respectfully submit this comment in response to the Court's September 16, 2025 Order (Docket No. ADM2025-01403) inviting public input on reforms to the regulation of the legal profession.

I am a fifty-two year old, one hundred percent disabled veteran and small business owner. From a young age, I aspired to the practice of law, but military service and life circumstances led me in a different direction. Today, as I seek ways to serve my community—especially fellow veterans who are among the most vulnerable and least represented—the existing system of legal education and licensure is simply inaccessible. Three years of full-time law school without income, followed by months devoted exclusively to preparing for the bar exam, is not possible for Tennesseans like me.

The current barriers exclude many qualified, motivated individuals who could competently and honorably serve the people of this state. I therefore write in strong support of meaningful reform, and in opposition to reforms that, in my judgment, would dilute the profession or misdirect its focus.

1. Core Curriculum, Baby Bar, Supervised Practice, and Portfolio Review

I propose the following pathway as an alternative to the traditional law school route:

1. **Foundational Legal Education:** All candidates should complete a core curriculum in fundamental subjects—constitutional law, contracts, torts, criminal law, civil procedure,

and ethics. This education may be delivered through state-approved programs, distance learning, apprenticeships, or non-traditional institutions.
2. **First-Year Competency Examination ("Baby Bar"):** Passage of a Baby Bar would confirm mastery of foundational principles before practice begins.
3. **Supervised Practice:** Candidates would then complete two years of structured, supervised practice under an experienced Tennessee attorney or judge, subject to reporting and oversight.
4. **Portfolio Evaluation:** At the conclusion of supervised practice, candidates would submit a portfolio of legal work—motions, pleadings, client communications, ethical analyses—for review by the Board of Law Examiners. Admission to the Tennessee Bar would be based on demonstrated knowledge, skills, character, and integrity.

This pathway preserves rigorous standards while removing unnecessary financial and structural barriers. It ensures an educational foundation, verifies knowledge, provides extensive supervised training, and evaluates competency through demonstrated legal work.

2. Opposition to Admission of Attorneys from Other States

I oppose relaxing admission standards for attorneys licensed elsewhere. If Tennessee lawyers often decline to serve the indigent and underrepresented, there is little reason to believe that lawyers from outside the state would voluntarily fill that gap. Reciprocity does not solve the access-to-justice crisis within Tennessee, and it risks diverting opportunities away from Tennessee residents who are committed to serving their own communities.

3. Opposition to Non-Lawyer Ownership and Fee-Sharing

I also oppose non-lawyer ownership of firms or fee-sharing arrangements. Such reforms will inevitably attract corporate enterprises motivated primarily by profit, not by public service. They would generate more corporate-style lawyering while doing little, if anything, to address unmet needs among indigent or underrepresented Tennesseans.

4. Opposition to Paraprofessional Licensure

Finally, I oppose creating paraprofessional or "limited" lawyer categories. The public deserves clarity and equity: one is either a lawyer, fully authorized and accountable, or one is not. A two-tier system risks public confusion, inequities in representation, and potential abuses. The solution lies not in creating partial lawyers, but in broadening genuine pathways to full licensure for those willing to serve.

Conclusion

The Court's initiative presents an opportunity to modernize the profession in a way that expands opportunity without sacrificing competency or integrity. By adopting a pathway based on core legal education, a Baby Bar, supervised practice, and portfolio evaluation, Tennessee can prepare attorneys who are fully competent and deeply committed to service, while rejecting measures that would dilute the profession or misdirect reform efforts.

Respectfully submitted,
Curtis S. Berkley

MaryBeth Lindsey

From: Curtis Berkley <CBerkley@wintn.com>
Sent: Wednesday, October 1, 2025 11:26 AM
To: appellatecourtclerk
Subject: Regulatory Reform, Docket No. ADM2025-01403
Attachments: Tennessee Supreme Court.pdf

Warning: Unusual sender
You don't usually receive emails from this address. Make sure you trust this sender before taking any actions.

Dear Clerk Hivner,

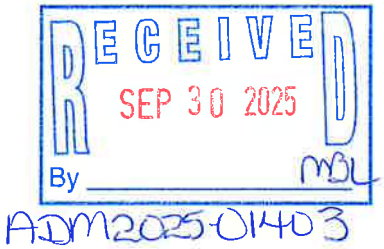
Attached please find my public comment in response to the Tennessee Supreme Court's September 16, 2025 Order (Docket No. ADM2025-01403) regarding regulation of the legal profession. I appreciate the Court's initiative in seeking public input and respectfully submit my recommendations for consideration.

A formal letter of the same will follow this email.

Thank you for your attention to this matter.

Respectfully,
Curtis S. Berkley
3958 Gordon Smith Rd.
Knoxville, TN 37938
(865)803-3423
cberkley@wintn.com

William T. Jackson, Jr.
1200 Broadway, Apt 2604
Nashville, TN 37209
wtjackson1979@gmail.com
224-387-9574



September 30, 2025

James Hivner, Clerk
Re: Regulatory Reform
100 Supreme Court Building
401 7th Avenue North
Nashville, TN 37219

Re: Public Comment on the Regulation of the Legal Profession and Pathways to Admission to the Tennessee Bar – No. ADM2025-01403

Introduction

The Tennessee Supreme Court's review of professional regulation is both timely and essential to expanding access to justice across the state. I respectfully submit this comment as a law student currently in good standing at Purdue Global Law School, where I maintain a 3.2 GPA. I expect to graduate December 2026, and I plan on taking the bar exam immediately thereafter.

As a Tennessee resident, my personal goal upon graduation is to practice law in Tennessee and provide legal services to indigent, veteran, and immigrant populations. I have firsthand experience having helped a homeless Nashville resident get back on their feet and navigate the legal system in Davidson County. I attend Church of the City in Franklin and am well aware of the challenges facing single mothers, foster children and veterans in our community as a result of our local programs.

Because I already own a successful business, I am financially independent and uniquely positioned to provide services pro bono or at minimal cost to clients in need. However, under Tennessee's current rules, I am not eligible to sit for Tennessee's bar exam, as Purdue Global Law School is a fully online law school and is not currently eligible for accreditation by the American Bar Association. (I cannot even transfer in a UBE score from another jurisdiction, because Purdue Global Law School is not "based

on in-person attendance.") This says nothing about the quality of the legal education I am receiving or my qualifications to practice law in Tennessee.

ABA Accreditation and Minimum Educational Requirements

I encourage the Court to reconsider its exclusive reliance on ABA accreditation as its criteria for bar exam eligibility. (Tennessee's rules contain a narrow exception for graduates of certain "Tennessee law schools," but this would not apply to me or numerous other graduates of an online law school like Purdue Global.) While the ABA's role in legal education is important, it should not be the sole measure of competency. Programs such as Purdue Global Law School provide rigorous training at significantly lower cost than many ABA institutions.

Restricting admission to ABA graduates excludes qualified, service-driven individuals who are committed to filling Tennessee's justice gap. Allowing graduates of state-accredited programs like Purdue Global to sit for the Tennessee Bar would expand the pool of attorneys prepared to serve the public.

Alternatives to ABA Accreditation

The Court could recognize several alternatives that balance accessibility with quality:

- **State-Accredited Law Schools**: Acceptance of graduates from state-accredited schools such as Purdue Global, which is accredited in California and approved for the bar exam in Indiana and Connecticut, would expand opportunity without sacrificing rigor.
- **Tennessee-Specific Accreditation or Review**: Under TSC Rule 7 Tennessee already has an exception for certain instate schools that are not ABA accredited. In the interest of expanding access to legal services for all Tennessee citizens this exception should be expanded to include any legal education program that provides requisite training and facilitates passing the Tennessee bar exam.
- **Competency-Based Measures**: Applicants should be assessed by their demonstrated knowledge and skills rather than institutional accreditation alone. Oregon is one example of a state that has recently adopted a non-bar-exam pathway to licensure.

These reforms would ensure competence while allowing committed future lawyers like me to contribute to the profession in Tennessee.

Less Costly Alternatives to the Traditional Model

The three-year, ABA-accredited law school model often results in student debt exceeding $200,000, placing representation of modest means clients out of reach for many. The COVID-19 pandemic fundamentally reshaped higher education, including legal education. During the pandemic, nearly every law school in the United States—including those accredited by the ABA—shifted to online or hybrid instruction for extended periods. This experience suggests that in the right circumstances, rigorous, interactive legal education can be delivered effectively in a virtual environment.

Purdue Global Law School, unlike institutions that adopted online platforms out of necessity, has operated successfully in the online space for decades. Its pedagogy has matured to include structured live instruction, rigorous assessments, interactive discussions, and simulated practice experiences that prepare graduates for the profession.

Post-pandemic, the stigma once attached to online education has largely disappeared. Employers and regulators alike now recognize that quality education can be delivered virtually. Programs like Purdue Global provide accessibility and affordability for nontraditional students, including working professionals, parents, and individuals who might not otherwise have the opportunity to pursue law. These are often the very students most committed to returning to their communities to provide affordable legal services—precisely the populations Tennessee needs to reach in order to reduce its justice gap.

Admission of Attorneys Licensed in Other States

Mobility between jurisdictions is increasingly necessary in today's economy. I encourage the Court to consider reducing barriers for attorneys in good standing in other states to be admitted in Tennessee. If someone has obtained licensure in another state, that should provide a sufficient indicium of reliability to allow them to pursue licensure in Tennessee, even if they attended a non-ABA law school, and even if that law school was online. This reform would expand the pool of lawyers available to Tennesseans, particularly in underserved areas, and would further the Court's commitment to access and affordability.

Conclusion

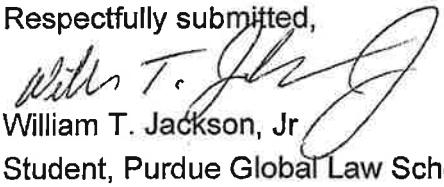
I have had as a personal goal to earn a JD degree and to practice law since I completed my career in the U.S. Air Force. I have become closely connected to Tennessee since moving here in 2020 and have seen up close the challenges that a significant portion of our citizenry faces in trying to navigate the legal system. Veterans, the indigent, foster children and families, and immigrants all struggle to access justice and this potential modification to credentialling standards in our state could go a long way toward helping the situation.

My request is simple and deeply personal: I ask the Court to recognize the education provided by Purdue Global Law School, and by extension, to allow graduates of state-accredited, non-ABA institutions to seek admission to the Tennessee Bar.

As a business owner with financial independence, I will not rely on law practice as my sole source of income. Instead, I intend to devote my career to providing affordable, and often pro bono, legal services to indigent, veteran, and immigrant Tennesseans.

By reforming bar eligibility standards, the Court would not only open the profession to individuals like me, but also directly advance its stated mission of ensuring affordable access to justice across the state.

Respectfully submitted,



William T. Jackson, Jr
Student, Purdue Global Law School

MaryBeth Lindsey

From: bill@pivotaltalentsearch.com
Sent: Tuesday, September 30, 2025 12:57 PM
To: appellatecourtclerk
Subject: DOCKET # ADM2025-01403 - PUBLIC COMMENTS ON POTENTIAL REGULATORY REFORMS TO INCREASE ACCESS TO QUALITY LEGAL REPRESENTATION
Attachments: RESPONSE TO ORDER SOLICITING PUBLIC COMMENTS ON POTENTIAL REGULATORY REFORMS TO INCREASE ACCESS TO QUALITY LEGAL REPRESENTATION.pdf

Warning: Unusual sender
You don't usually receive emails from this address. Make sure you trust this sender before taking any actions.

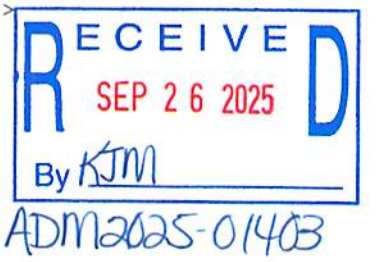
Good afternoon,
Please see attached for my response to the request for comments.

Regards,

Bill Jackson
Chief Operating Officer | **Pivotal Talent Search**
224.387.9574| bill@pivotaltalentsearch.com

Kim Meador

From: Brendan Hernandez <brendan.hernandez@proton.me>
Sent: Friday, September 26, 2025 2:50 PM
To: appellatecourtclerk
Cc: brendan.hernandez@proton.me
Subject: Comments: No. ADM2025-01403



Warning: Unusual sender <brendan.hernandez@proton.me>
You don't usually receive emails from this address. Make sure you trust this sender before taking any actions.

Comments: No. ADM2025-01403
To: Tennessee Supreme Court

Very often when a state Supreme Court asks for comments, it usually places more heavy weight on the written comments made by law school Deans and large legal professional associations. My hope is that the Tennessee Supreme Court places greater weight on comments from individuals, who are aspiring lawyers, who actually experience the awful drawbacks inflicted on us by the American Bar Association (ABA).

To keep my written comments succinct, I believe the Texas Supreme Court should immediately implement the following:

1. The Texas Supreme Court should totally ban the involvement of the ABA in any aspect of 'accreditation' of laws schools in the state. The ABA has become a cartel which primarily focuses on decreasing the quantity of lawyers in the state, to economic benefit those who currently practice law in the state. Simply put, the less lawyers in the state, the more the existing lawyers get paid. It's gross, unjust, and should be seen for what it is.

2. Multiple alternative pathways should be created by the Texas Supreme Court for the practice of law in the state. This should include abolishing the 'bar exam' (of which the ABA has massive influence) in place of practice oriented approach, and providing strong recognition for law school legal education in itself. Currently, law students take over 25 separate exams during their law school. This is more than enough testing to ensure that a candidate to practice law understands basic concepts of law.

3. As referenced above, the Tennessee Supreme Court should totally abolish the bar exam, in favor of multiple pathways to practice law in the state without the requirement to take a bar exam. The bar exam has proven to be a lousy impediment to bringing high quality lawyers into the professional. Great 'exam takers' do not equate to great lawyers - great lawyers are those that have a passion for law, their clients, and justice.

4. The Texas Supreme Court should allow foreign law graduates (particularly those from common law jurisdictions) to participate in any alternative pathway(s) that are created for the practice of law in the state. If a foreign law graduate holds an LLM from a reputable U.S. law school (whether gained online or in-person), they should be eligible to participate in the state alternative pathways to practice law.

My hope is that the Tennessee Supreme Court thinks about the individuals that the ABA continues to hurt. The ABA is a Washington DC based organization that cares only about its funding and its own left-leaning political agendas. The organization clearly takes steps to indirectly curtail the practice of law by conservatives and Republicans.

Many of these individuals are those who do not have the time or focus to even write comments to the Supreme Court on this matter. However, I can vouch for their deep concerns that the ABA has turned into a politically controlled association designed to keep new lawyers from entering the legal profession - not only in Tennessee, but across the nation.

The leadership of the Court should be commended for its aggressive and timely concern about this issue, and my hope is that the Court takes immediate and aggressive reform actions to ensure that the ABA can no longer de facto control the legal profession in the United States.

Sincerely,

Brendan Hernandez

Kim Meador

From: Brendan Hernandez <brendan.hernandez@proton.me>
Sent: Friday, September 26, 2025 2:50 PM
To: appellatecourtclerk
Cc: brendan.hernandez@proton.me
Subject: Comments: No. ADM2025-01403

RECEIVED
SEP 26 2025
By KIM
ADM2025-01403

Warning: Unusual sender <brendan.hernandez@proton.me>
You don't usually receive emails from this address. Make sure you trust this sender before taking any actions.

Comments: No. ADM2025-01403
To: Tennessee Supreme Court

Very often when a state Supreme Court asks for comments, it usually places more heavy weight on the written comments made by law school Deans and large legal professional associations. My hope is that the Tennessee Supreme Court places greater weight on comments from individuals, who are aspiring lawyers, who actually experience the awful drawbacks inflicted on us by the American Bar Association (ABA).

To keep my written comments succinct, I believe the Texas Supreme Court should immediately implement the following:

1. The Texas Supreme Court should totally ban the involvement of the ABA in any aspect of 'accreditation' of laws schools in the state. The ABA has become a cartel which primarily focuses on decreasing the quantity of lawyers in the state, to economic benefit those who currently practice law in the state. Simply put, the less lawyers in the state, the more the existing lawyers get paid. It's gross, unjust, and should be seen for what it is.

2. Multiple alternative pathways should be created by the Texas Supreme Court for the practice of law in the state. This should include abolishing the 'bar exam' (of which the ABA has massive influence) in place of practice oriented approach, and providing strong recognition for law school legal education in itself. Currently, law students take over 25 separate exams during their law school. This is more than enough testing to ensure that a candidate to practice law understands basic concepts of law.

3. As referenced above, the Tennessee Supreme Court should totally abolish the bar exam, in favor of multiple pathways to practice law in the state without the requirement to take a bar exam. The bar exam has proven to be a lousy impediment to bringing high quality lawyers into the professional. Great 'exam takers' do not equate to great lawyers - great lawyers are those that have a passion for law, their clients, and justice.

4. The Texas Supreme Court should allow foreign law graduates (particularly those from common law jurisdictions) to participate in any alternative pathway(s) that are created for the practice of law in the state. If a foreign law graduate holds an LLM from a reputable U.S. law school (whether gained online or in-person), they should be eligible to participate in the state alternative pathways to practice law.

My hope is that the Tennessee Supreme Court thinks about the individuals that the ABA continues to hurt. The ABA is a Washington DC based organization that cares only about its funding and its own left-leaning political agendas. The organization clearly takes steps to indirectly curtail the practice of law by conservatives and Republicans.

Many of these individuals are those who do not have the time or focus to even write comments to the Supreme Court on this matter. However, I can vouch for their deep concerns that the ABA has turned into a politically controlled association designed to keep new lawyers from entering the legal profession - not only in Tennessee, but across the nation.

The leadership of the Court should be commended for its aggressive and timely concern about this issue, and my hope is that the Court takes immediate and aggressive reform actions to ensure that the ABA can no longer de facto control the legal profession in the United States.

Sincerely,

Brendan Hernandez

Kim Meador

From: Cole, Daniel <DCole@chamblisslaw.com>
Sent: Friday, September 26, 2025 2:05 PM
To: appellatecourtclerk
Subject: Re: Regulatory Reform No. ADM2025-01403

RECEIVED
SEP 26 2025
By KJM
ADM2025-01403

Warning: Unusual sender <dcole@chamblisslaw.com>
You don't usually receive emails from this address. Make sure you trust this sender before taking any actions.

As a recent transplant from North Carolina and a patent lawyer these are my answers to the questions public comment was sought on:

1. The state should in no way modify, reduce, or eliminate reliance on the ABA for setting minimum educational requirements for lawyers. These requirements ensure that lawyers are competent – especially lawyers going into litigation in any form need to meet these standards. Lowering these standards would not increase affordability of competent legal services but only increase the number of incompetent lawyers in the state.

2. Neither should the state consider any accreditation services other than the ABA – doing so would only have the same affect as 1 above.

3. I also do not support alternative pathways for admission to the bar. The bar exam, even the newer multistate version, does not test nearly all the skills required for a lawyer. Going to a competent law school though accredited by the ABA still though does teach them. Critically the method of thinking lawyers must adopt to ethically do what we do. Coming from science, and working in higher education before going to law school I can say this is a method of thought not used by either of these professions. I expect it is a very particular mode of thought not used by any other profession. It is however required.

4. I have a unique perspective on this as I just entered in April of this year. I found the process lengthy, expensive, and confusing. Largely however I understand the need for it. Though I think having to send to Tennessee all of the information I sent to the NC bar and UNC law again was a bit much – certainly proving I have worked for the five years required and sending notices of good standing and any disbarment or compliant information I have was completely understandable and should not be changed.

5. I am of mixed feelings on this question. While I do believe this might go along way to decreasing legal prices by increasing the number of independent lawyers (If I could find investment I might very well go independent), however I worry it would make the profession make legal decisions based on money even more than it does now. In North Carolina I had several bosses who made me write patents that both of us knew were extremely likely to fail rather than advising the clients not to waste their time and money. That the lawyer I work for now seeks to settle and attempts to convince clients and opposing counsel to do so when it is in everyone's best interest but they might rather fight, as opposed on ginning up conflict to ring up large bills, amazed me. I would want to make sure this kind of behavior continues and is encouraged.

On the other more general questions I expect (given what I am learning about the politics of Tennessee) you are not going to like my answers. I do not think there is a less costly alternative to the traditional three-year law school curriculum – maybe apprenticeship but that would likely again only give a very specific workman like knowledge of the law and not the overall understanding that law school gives. I think this would be a mistake. North Carolina has a law school at UNC that is publicly funded as UNC is publicly funded. Tennessee has seems to have two – one associated with the University of Tennessee and one associated with the University of Nashville. This is great! Expanding the support of these institutions and increasing the number of attending students who choose to stay in Tennessee would likely go a long way to increasing the local law supply and thus decrease costs. For rural areas increasing tele-support may help – but I expect a lot of people will still want to meet with lawyers in person so the lack of business in these smaller communities will continue to be a problem.

As for legal services that can be performed by paraprofessionals ... honestly knowing what I know about complications and traps for the unwary that litter law I wouldn't even want a paralegal to write a simple will for a single person who wants to leave everything they have to a single charity. Maybe simple traffic court cases – first time speeding tickets? Cases where someone is pleading guilty maybe a lawyer doesn't need to be present when they agree to the guilty verdict? (should still certainly be able to argue mitigating factors verbally in court). I may be very wrong here though as I practice no criminal law and took only the most basic crim law class in law school.

For both criminal and civil law in Tennessee increased support to indigent defense and increased support for legal aid is likely the best option to increase access to justice.

Hope the above is helpful thank you for collecting opinions.

Daniel Cole
Registered Patent Attorney

Chambliss, Bahner & Stophel, P.C.
Liberty Tower
605 Chestnut Street, Suite 1700
Chattanooga, TN 37450

P (423) 757-0261
F (423) 508-1261
dcole@chamblisslaw.com | www.chamblisslaw.com

This transmission is confidential and may be privileged or proprietary. If you are not the intended recipient, you are not authorized to use the information in this transmission in any way. Please inform the

Kim Meador

From: Jake Perry <jperry@rma-law.com>
Sent: Friday, September 26, 2025 11:29 AM
To: appellatecourtclerk
Subject: Re: Regulatory Reform No. ADM2025-01403

RECEIVED
SEP 26 2025
By KJM
ADM2025-01403

Warning: Unusual sender <jperry@rma-law.com>
You don't usually receive emails from this address. Make sure you trust this sender before taking any actions.

Good morning. In response to the State Supreme Court seeking comments on the regulation of the legal profession, I would like to submit the following comments on specific topics:

(3) consider adopting alternative pathways for admission to the bar

While there is much debate on whether law school and the bar exam adequately measure a person's ability to be an effective lawyer, law school and the bar examination do at least provide some level of objective standards to ensure that a person admitted to the bar has a basic understanding of law. For this reason, the law school and bar exam model should remain in effect.

In lieu of law school, some state permit an apprenticeship program. According to an August 10, 2022 article by the Indianapolis Bar Association, in those states that permit an apprenticeship program in lieu of law school (whether fully or partially) did not perform as well on the bar exam compared to the their traditional law school counterparts. As stated in the article:

> There are . . . disadvantages to law school apprenticeships, notably, the bar passage rates. In all four states with true apprenticeship programs, the bar passage rate is lower among those who studied law in an apprenticeship rather than in law school. However, the difference in bar passage rate varies by state. Recent bar passage rates for participants in California's Law Office Study Program were not available.
>
> - Vermont: In 2021, 50% of those who took the bar after studying through Vermont's Law Office Study Program passed. The passage rate for those who graduated from an ABA accredited law school was 56%. From 2017 to 2019, 54% of those who sat for the Vermont Bar after studying through the Law Office Study Program passed. The bar passage rate for law school graduates during the same time frame was 64%. There are currently 46 people enrolled in the Law Office Study Program. The program typically has about 10-15 new participants annually, though not all complete the program.
> - Virginia: From 2001 to 2019, the bar passage rate for those who studied in the Law Reader Program was 19% while the overall passage rate was 68%. During this same time frame, 22,817 people passed the Virginia Bar; 32 of them studied through the Law Reader Program.
> - Washington: 30.8% of bar takers who studied law though the Law Clerk Program passed the July 2021 bar; the passage rate for those with a J.D. from an ABA accredited law school was 80.3%. However, the disparity is less extreme when only considering first-time takers, 57.1% of Law Clerks passed the July 2021 bar on their first attempt, while 83.7% of graduates from ABA accredited schools passed.
>
> New York and Maine offer programs in which participants must complete some law school at ABA accredited institutions but may complete their legal studies with an apprenticeship. New York requires students to complete at least the first-year law school courses, and the combination of time in law school and time studying through an apprenticeship must total four years. Maine requires that a student complete at least 2/3 of the academic requirements for graduation from an ABA accredited law school and at least a year of study in a law office. In New York, 20% those sitting for the 2021 bar who utilized the Law Office Study Program passed. 75% of test takers from ABA accredited law schools passed, and

the overall passage rate was 60%. Bar passage rates of participants in Maine's legal apprenticeship program were unavailable.

See Apprenticeship Alternatives to Law School - Government Practice News, https://www.indybar.org/?pg=GovernmentPracticeNews&blAction=showEntry&blogEntry=79791 (Aug. 10. 2022), *accessed* Sept. 26, 2026.

These data samples from other states exemplify that apprenticeship-path students objectively did not perform as well on the bar exam. This could be due to other factors (e.g., these students are more likely to choose an apprenticeship because they feel they do not perform well in school settings and/or are not good test takers), but the fact remains that there must be some objective standard to test competency, and the bar exam is the best we have for that. So, while this commentor is not necessarily opposed to allowing an alternative path to law school, the bar exam must remain in place to safeguard the profession. Further, there is strong evidence not to permit alternative paths to the profession based upon data samples that apprenticeship students did not perform as well on the bar exam.

Rather than do away with the schooling or the bar exam, a focus on streamlining the amount of school required would be a better approach. Currently, an attorney is required to obtain a 4-year bachelor's degree and attend 3 years of law school for a combined seven years of school. While some schools have developed 3+3 programs, this approach also requires that the student attend said school for the entire duration of their college career. There are likely means to streamline this process further as much of an undergraduate degree does not prepare one for the practice of law.

(5) modify, reduce or eliminate regulations prohibiting non-lawyer ownership of law firms or fee sharing with non-lawyers.

Permitting non-lawyers to have ownership rights in a law firm is dangerous and will quickly erode our profession. While such measures are often framed as innovations aimed at increasing access to justice or promoting efficiency, they pose a serious threat to the foundational principles of our profession and the profession itself.

The legal profession is not merely a business. It is a vocation grounded in fiduciary duty, confidentiality, loyalty, and an unwavering commitment to the administration of justice. Lawyers are bound by ethical obligations that often require them to act against their own financial interests in service of a client's rights or the integrity of the legal system. Introducing non-lawyer ownership risks subordinating these duties to commercial pressures and investor interests. Non-lawyers are not subject to the same ethical codes, disciplinary oversight, or duty of candor to the court. Their priorities (i.e., return on investment, market share, cost-cutting, et cetera) may directly conflict with the lawyer's duty to provide zealous and independent representation.

Further, permitting non-lawyers to have ownership stake in a law firm begs for large-scale commercialization of our profession and the erosion of a quality product. Large companies could operate at a loss/break even in an effort to drive out competition. As competition from traditional law firms decreases, the prices of these non-lawyer owned firms will increase, and the consumer suffer. For example, if Legal Zoom were able to hire a team of lawyers to edit and mass sell contract forms, wills, etc., you could see a mass extinction of certain practice areas.

I urge you to oppose any measure that permits non-lawyers to own, control, or influence law firms. The long-term consequences of such a policy will be felt not only by attorneys, but by every citizen who relies on the legal system to protect their rights, resolve disputes, and uphold the rule of law.

Jacob L. Perry, Attorney
Rochelle, McCulloch & Aulds, PLLC
109 North Castle Heights Avenue
Lebanon, Tennessee 37087
Phone: 615-444-1433
Fax: 615-443-8775
E-mail: jperry@rma-law.com
Website: www.rma-law.com

Kim Meador

From: Matthew Ryan <mryan@rma-law.com>
Sent: Friday, September 26, 2025 11:59 AM
To: appellatecourtclerk
Subject: Re: Regulatory Reform No. ADM2025-01403

RECEIVED
SEP 26 2025
By KIM
ADM2025-01403

Warning: Unusual sender <mryan@rma-law.com>
You don't usually receive emails from this address. Make sure you trust this sender before taking any actions.

I am against this proposed reform, especially the following:

"...States have started experimenting with regulatory reforms aimed at increasing the supply of legal services and thereby lowering their costs. These reforms include the limited licensing of paraprofessionals to provide certain legal services, allowing non-lawyer ownership of law firms, and providing alternative pathways to licensure other than a traditional three-year legal education and successful completion of the bar examination."

This is not only good for the legal profession, but also the general public that needs legal help. **Let's see this proposal for what it really is, an attempt for non-lawyers to practice law in our state for profit, not helping those in need of legal assistance.**

Sincerely,

Matthew

Matthew H. Ryan, Attorney at Law
ROCHELLE, McCULLOCH & AULDS, P.L.L.C.
Lebanon Office:
109 N. Castle Heights Ave.
Lebanon, TN 37087
Direct Phone: 615-443-8753
Fax: 615- 443-3846
Mt. Juliet Office:
2745 N. Mt. Juliet Road
Mt. Juliet, TN 37122
Phone: 615-443-8787
Email: mryan@rma-law.com
Web: www.rma-law.com

RMA
ATTORNEYS AT LAW
Rochelle, McCulloch & Aulds, PLLC

Kim Meador

From: Mary Lambert <ShellsWorkBook@outlook.com>
Sent: Friday, September 26, 2025 11:11 AM
To: appellatecourtclerk
Subject: Re: Regulatory Reform No. ADM2025-01403

RECEIVED
SEP 26 2025
By KJM

ADM2025-01403

Warning: Unusual sender <shellsworkbook@outlook.com>
You don't usually receive emails from this address. Make sure you trust this sender before taking any actions.

To whom it may concern:

I hope this message finds you well. I am writing to bring to your attention several ethical concerns regarding my recent custody case against the department of children services and the treatment I received as an indigent client with an ADA-accommodated diagnosis.

Throughout the proceedings, I was appointed seven different attorneys, each of whom eventually withdrew from my case. This constant turnover severely impacted my ability to effectively communicate and participate in my defense, especially given my struggles with CPTSD.

Moreover, despite reaching out to the ADA association within my local court system, I did not receive any response, leaving me without crucial support. Additionally, the conduct of the state's attorney involved in the termination of parental rights case was troubling. The attorney made defamatory statements and manipulated facts, which I reported to the Board of Professional Responsibility. Unfortunately, my concerns were not addressed, as I was considered the defendant rather than the client.

Given these circumstances, I am deeply concerned about the self-regulation of lawyers in Tennessee and the potential for ethical standards to be compromised. I respectfully urge your office to look into these matters to ensure that all clients receive fair and ethical representation, regardless of their circumstances.

Thank you for your attention to this critical issue. I look forward to your response.

Sincerely,
Mary Lambert

Kim Meador

From: The Migrant Alliance <themigrantalliance@gmail.com>
Sent: Tuesday, September 23, 2025 7:23 PM
To: appellatecourtclerk
Cc: service@americanbar.org
Subject: Public Comment – Review of ABA Accreditation Requirement for Bar Admission in Tennessee

RECEIVED
SEP 23 2025
By KJM
ADM2025-01403

Warning: Unusual sender <themigrantalliance@gmail.com>
You don't usually receive emails from this address. Make sure you trust this sender before taking any actions.

Tennessee Supreme Court
Attn: Clerk of the Appellate Courts
401 7th Avenue North
Nashville, TN 37219-1407

Date: September 23, 2025,

Re: Public Comment – Review of ABA Accreditation Requirement for Bar Admission in Tennessee

Dear Honorable Justices of the Tennessee Supreme Court,

I am writing to express my support for Tennessee's consideration of alternatives to the requirement that bar applicants graduate from an American Bar Association (ABA)-accredited law school. As a Texas resident, single parent, civil rights advocate, and director of *The Migrant Alliance*, I applaud this Court for opening this critical conversation.

The ABA's current stranglehold on legal education not only promotes red tape and rigid bureaucracy, but it functions as a **gatekeeper that favors privileged applicants** while excluding countless talented individuals from low-income, minority, and working-class backgrounds. Law schools accredited by the ABA often leave students burdened with upwards of $150,000 in debt—an unconscionable barrier that deters qualified and committed individuals from entering the legal profession, particularly those seeking to serve underserved communities.

As a 44-year-old working professional and single parent, I have found it nearly impossible to participate in the traditional ABA-dominated legal education system. In response, I have decided to enroll in **Northwestern California University School of Law (NWCUSLAW)**—a fully online, California-accredited law school—which will qualify me to sit for the California Bar Exam. My intent is to practice immigration law, a federal practice area that allows lawyers admitted in one state to serve clients across the country. Tennessee—and other states—must recognize that federal legal practice and modern realities demand more accessible pathways to licensure.

It is also essential to acknowledge the harm caused by current **Unauthorized Practice of Law (UPL)** restrictions. These rules often prevent trained non-attorney legal professionals from delivering affordable legal services, particularly in areas like immigration, small claims, housing, and consumer disputes. These UPL rules are not about protecting the public, but about protecting the **legal monopoly cartel** that has benefited from exclusive control for decades—at the expense of our most vulnerable communities. This violates both the **First and Fourteenth Amendments** by suppressing the rights of legal advocates and the people they serve.

With the rise of **artificial intelligence**, new forms of legal assistance, and digital tools, the traditional legal profession is evolving rapidly. The bar admission process must evolve with it. Tennessee can lead by adopting a **modern, inclusive framework** that promotes quality legal services without clinging to obsolete standards.

The ABA's model is no longer fit for the future—it is rigid, exclusionary, and increasingly disconnected from the realities of modern American life. I urge the Tennessee Supreme Court to stand with reformers and break away from this outdated mold. We need a system that values **access, affordability, innovation, and the constitutional right to work**.

Thank you for your time and thoughtful consideration.

Sincerely,
Augusto J. Martinez
Director, *The Migrant Alliance*
1505 George Dieter Dr, Ste 109 #590
El Paso, TX 79936
Tel. (818) 272-6336
themigrantalliance@gmail.com

Augusto J Martinez, Director
The Migrant Alliance
1505 George Dieter Dr
El Paso TX 79936
Tel. 818-272-6336
themigrantalliance@gmail.com

Kim Meador

RECEIVED
SEP 21 2025
By KIM
ADM2025-01403

From: Russell Fowler <rfowler@laet.org>
Sent: Sunday, September 21, 2025 8:15 AM
To: appellatecourtclerk
Subject: Docket No. ADM2025-01403

Warning: Unusual sender <rfowler@laet.org>
You don't usually receive emails from this address. Make sure you trust this sender before taking any actions.

First, thank you for considering my views on these important issues. Please note that in addition to practicing law since 1987, I regularly recruit, hire, and train new lawyers and I teach pre-law students at the University of Tennessee at Chattanooga (UTC). And, some of these issues touch on access to justice by low-income and rural Tennesseans and I have been in management of a Tennessee legal aid program serving 26 Tennessee counties since 1997.

(1) Modify, reduce or eliminate reliance on American Bar Association (ABA) accreditation in setting minimum educational requirements for lawyers.

Tennessee should only end reliance on the ABA *if the ABA lowers or relaxes its standards*. In general, the educational quality of new lawyers has been in decline and we should do nothing to exacerbate that problem. For example, I have heard suggestions of reducing law school from three to two years. I believe that would do massive damage to the profession and to the public interest. I believe in more requirements not less. For example, we need to return to law schools requiring a course on equity and, to build respect for the profession, add legal history to the curriculum.

(2) Consider alternatives to ABA accreditation.

Only if the alternatives are *more* rigorous not less. New lawyer quality is already in decline as stated.

(3) Consider adopting alternative pathways for admission to the bar.

No. New pathways imply easier access to bar admission. We do not need to lower standards. We need to focus on higher quality of lawyers not higher quantity. Too many lawyers drives down quality and ethical standards and endangers the public. We do need to find ways to attract more lawyers to rural areas, but driving up the number of lawyers in general is not the way. Rural Tennesseans need more good lawyers not a lot of bad lawyers. And low-income Tennesseans need more good lawyers volunteering to help them, not more desperate lawyers ignoring or taking advantage of them.

(4) Consider modifying requirements for admission for those licensed in other states

No. I believe Tennessee's requirements are fair and logical, except the process is sometimes way too slow.

(5) Modify, reduce or eliminate regulations prohibiting non-lawyer ownership of law firms or fee sharing with non-lawyers.

No. The practice of law is much more than a trade or business. In fact, as President Coolidge said, the law is "the highest of the professions." We should do nothing to undermine that great calling to public service and the furtherance of justice. Some things are more important than financial efficiency.

Again, thank you for considering my comments.

Respectfully submitted:

Russell Fowler
Director of Litigation and Advocacy / Managing Attorney
Legal Aid of East Tennessee
100 W. Martin Luther King Blvd., Suite 402
Chattanooga, TN 37402
Phone: 423-402-4764 / Toll Free: 800-572-7457 / Fax: 423-265-4164
www.laet.org

Justice shouldn't depend on income. Support our mission. Give the gift of justice. Donate today at LAET.org

IMPORTANT DISCLAIMERS

PRIVILEGED AND CONFIDENTIAL INFORMATION:
****This e-mail may contain PRIVILEGED and CONFIDENTIAL information and is intended only for the use of the specific individual(s) to which it is addressed. Review by any individual other than the intended recipient shall not constitute waiver of the attorney-client privilege, the attorney work-product doctrine, any evidentiary privilege, or any proprietary rights in the information. If you are not an intended recipient of this e-mail, please delete it and immediately notify the person named above by telephone or reply e-mail. Thank you.

INTENT NOT TO BE BOUND:
****The sender of this transmission does not intend to create or be bound by any agreement that otherwise might arise pursuant to any international, federal or state law. Including but not limited to the Electronic Signature Act.

TAX ADVICE:
****Any tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or applicable tax laws or (ii) promoting, marketing, or recommending to another party any transaction or matter addressed herein. Please consult your tax advisor for guidance specific to your situation.

Kim Meador

From: Lillian Burke <lpburke@peerlessmail.net>
Sent: Saturday, September 20, 2025 9:32 PM
To: appellatecourtclerk
Cc: Lillian Burke peer
Subject: Re: Docket # ADM2025-01403

RECEIVED
SEP 20 2025
By KJM
ADM2025-01403

Warning: Unusual sender <lpburke@peerlessmail.net>
You don't usually receive emails from this address. Make sure you trust this sender before taking any actions.

James Hivner, Clerk
Re: Regulatory Reform
100 Supreme Court Building
401 7th Avenue North
Nashville, TN 37219-1307

No. ADM2025-01403

Mr. Hivner,

I am writing to comment on the proposal that TN should not require ABA certification for the practice of law.

I am a physician, now retired from practice, but am interested in supporting the rights of certain patients and physicians. As a retired person, it would be difficult for me to enroll in a full time program; therefore, I enrolled in Purdue Global law school.

Graduates can sit for the bar in California and in other states under various arrangements. In California, the Purdue passage rate is comparable to many ABA approved schools, though not as high as Harvard or Stanford. Last year, for the first time, Indiana allowed graduates to take the bar and all five passed. At least one graduate has practiced before the US Supreme Court, there are several who are judges and others who have made a good career for themselves.

In my law school cohort, there are several physicians and other medical professionals, including me, a retired OB GYN MD, and a well-published Neurosurgeon who is on the faculty of the leading institution. Most of the students are mid-career professionals. For all of us, it would be very difficult to attend class during the day. We have discussed that the educational quality is high.

Many students seem to come from rural areas and have families, which would make law school impossible. These students are more likely to practice in rural areas and provide good service.

We have classes every week with a lot of interaction- the maximum class size is usually about 30 and there is a lot of discussion, so our professors do get to know us well. We have access to the full academic library as well as Westlaw. It seems that they do deal with problematic students as they either moderate their conduct or disappear. Of course, these details are private. They have a relatively open admission policy but a lot of people do not make it more than 1-2 semesters. I don't think it is like predatory law schools as the total cost (4 year program) is about $54K, so it is also a lot less expensive. At my age, it would not be reasonable for me to spend $180K for legal education.

Purdue is not ABA accredited. The main sticking point is that there are no in person classes. In this day and age, it is not clear how that matters.

For these reasons, I believe that Purdue graduates should be allowed to sit for the bar in Tennessee.

That said, there is value to having an oversight professional group that sets standards. I do know that Purdue has worked actively with them. These groups are similar to those that certify hospitals, physicians, and surgeons, and I have personally seen how this improves care- though of course it can be stressful also.

I do believe that formal training is important. One can "pick up" quite a bit by working in the field, but there are some basics that everyone needs to know. Some of this education will only be needed in rare circumstances, but if you let in a lot of people with informal training, there will be risks of diluting the professional qualifications of those who serve as lawyers. Allowing people to train at a fully online school such as Purdue, would allow people to work as paralegals and still get the needed education. We have several paralegals in our class and they do benefit from the additional training.

Please take these observations into consideration as you consider options for opening the bar to additional types of training.

Feel free to contact me if I can be of further assistance to you.

Lillian Burke, MD
6521 Marina Dr.
Prospect, KY 40059
252 258 6978
LpBurke@peerlessmail.net

Kim Meador

From: Terry Cox <terrycox@coxelderlaw.com>
Sent: Friday, September 19, 2025 9:35 AM
To: appellatecourtclerk
Subject: Re: Regulatory Reform No. ADM2025-01403

RECEIVED
SEP 19 2025
By KJM
ADM2025-01403

Warning: Unusual sender <terrycox@coxelderlaw.com>
You don't usually receive emails from this address. Make sure you trust this sender before taking any actions.

Thank you for allowing me to comment. The objective articulated in the order is laudable. I have long believed that the way to accomplish this goal is not by flooding the marketplace with more lawyers.

The goal can be accomplished by adopting a program of limited licensure. Our profession should self-restrict the areas of law in which one may practice. Far too many lawyers handle matters for which they are not sufficiently educated or experienced.

We should follow the historical model observed by physicians in which one may only practice within the narrow discipline for which one is certified.

Adopting limited licensure would keep every practitioner in his or her own "lane." The quality of practice in every legal discipline would improve and services would be delivered more efficiently and competently.

Disadvantaged persons will not receive more and better legal care if there are simply more lawyers holding licenses. Disadvantaged persons will receive more and better legal care if a segment of the legal practitioner community is licensed to practice in disciplines peculiar to the needs of this group of consumers.

Terry Cox

--
Sincerely,

Terry C. Cox
Attorney
149 South Rowlett
Collierville, Tennessee 38017
901-853-3500
901-853-3525 (fax)

CONFIDENTIALITY NOTICE: This e-mail and its attachments (if any) contain confidential information of the sender which is legally privileged. The information is intended only for the use by the direct address(es) of the original sender (or

Kim Meador

From: Greta Locklear <gretalocklear@yahoo.com>
Sent: Friday, September 19, 2025 12:30 PM
To: appellatecourtclerk
Subject: Re: Regulatory Reform No. ADM2025-01403

RECEIVED
SEP 19 2025
By KM
ADM2025-01403

Warning: Unusual sender <gretalocklear@yahoo.com>
You don't usually receive emails from this address. Make sure you trust this sender before taking any actions.

How about doing away with the privilege tax? We definitely do not need to reduce the educational requirements for lawyers. If you expect lawyers to charge less perhaps law school should cost less. I am primarily a child welfare attorney and make very little money on court appointed cases and I feel like we should get free continuing legal education and that our student loans should be marked paid in full after so many years practicing child welfare law at such a low rate.

Thank you.
Greta Locklear

Sent from Yahoo Mail for iPhone

Kim Meador

From: Morgan Valentine <morganvalentine@gmail.com>
Sent: Thursday, September 18, 2025 6:37 PM
To: appellatecourtclerk
Subject: Docket No. ADM2025-01403

RECEIVED
SEP 18 2025
By KJM
ADM2025-01403

Warning: Unusual sender <morganvalentine@gmail.com>
You don't usually receive emails from this address. Make sure you trust this sender before taking any actions.

Re: Public Comment on Proposals to Permit Non-Lawyer Ownership of Law Practices and Lowering Bar Admission Standards (Docket No. ADM2025-01403)

Dear Honorable Justices,

I write to respectfully oppose the proposals to allow non-lawyer ownership of law practices and to lower the requirements for admission to the bar in Tennessee. While I understand the stated intent may be to increase access to justice, I believe these changes will, in practice, diminish the quality, independence, and integrity of our legal profession and ultimately erode public trust in the justice system.

1. Risks of Non-Lawyer Ownership
Opening the door to non-lawyer ownership invites outside business and technology interests to prioritize profit over professional duty. We have seen the harmful consequences of this in the medical field, where corporate interests often dictate care, driving up costs while eroding the doctor-patient relationship. The attorney-client relationship, grounded in strict fiduciary duty, must not be subjected to the same pressures. A law practice's first and only loyalty should be to its clients, not to shareholders.

2. The False Promise of "Innovation"
Some argue that non-lawyer ownership will bring innovation—particularly from the technology sector. This is a misconception. Lawyers across Tennessee are already integrating new tools, including artificial intelligence, to serve their clients more effectively. Paralegals, legal assistants, and other non-lawyer professionals already collaborate closely with attorneys to realize productivity gains. The real effect of shifting ownership outside the profession is not to create new innovation but to divert the financial benefits of these efficiencies away from clients and attorneys, and into the hands of business owners and investors. Instead of consumers enjoying lower costs through reduced billable hours, those savings will be captured as profits for corporations.

3. Economic Harm to the Profession and the Public
Law is one of the last professions where individuals can still make a stable and respectable living without requiring generational wealth or years of residency training. Allowing corporate ownership will siphon earnings out of Tennessee attorneys' hands and into the accounts of outside investors. This threatens to push talented lawyers out of the state and reduce the availability of high-quality, committed practitioners. Citizens will suffer when the best attorneys leave for jurisdictions that protect their independence.

4. Lowering Standards Endangers Quality of Representation
Tennessee already has multiple pathways and affordable law schools for aspiring lawyers. Lowering the bar to entry will not meaningfully expand access but will reduce the quality of representation citizens receive. The law is complex, and Tennesseans deserve competent, rigorously trained advocates. Diluting professional standards risks turning the practice of law into a commodity, further undermining trust in our courts and attorneys.

5. Public Confidence at Stake
Faith in the legal system rests on the public's perception that lawyers are highly trained professionals who act with intelligence, integrity, and independence. If law firms become another profit center for corporate interests—or if bar standards are weakened—citizens will rightly question whether their attorneys are serving them or their investors. Public confidence, once eroded, is difficult to rebuild.

For these reasons, I strongly urge the Court to reject these proposals. Instead, efforts to increase access to justice should focus on strengthening legal aid programs, supporting pro bono initiatives, and leveraging technology in ways that keep lawyers—not corporations—in control of legal practice.

Thank you for your careful consideration of this matter. Protecting the independence, competence, and trustworthiness of the legal profession is essential to protecting the rights of every Tennessean.

Respectfully submitted,

Morgan Valentine,

Concerned Citizen

Kim Meador

From: scott@scottdhallesq.com
Sent: Thursday, September 18, 2025 6:58 PM
To: appellatecourtclerk
Subject: Regulatory Reform No. ADM2025-01403

RECEIVED
SEP 18 2025
By KJM

ADM2025-01403

Warning: Unusual sender <scott@scottdhallesq.com>
You don't usually receive emails from this address. Make sure you trust this sender before taking any actions.

1. Lowering barriers to entry into the profession results in lowering the standards for being a lawyer. Being a lawyer is difficult, event after 30+ years of practice and after attending a 3-year Law Curriculum at the finest law school in the Nation. Lowering barriers means lowering the quality of service.

Any lawyer should be embarrassed to suggestion such course of action. We have lost site of reality if we choose to lower our standards in Tennessee. Such would be a disservice to the community, including the legal community. Lowering the standards is rather despicable, especially considering the lofty ideals and standards the Supreme Court spews about the State when issuing its opinions on Disciplinary matters and at speaking engagements.

2. Ensuring availability of affordable legal services in the state while ensuring the competency of attorneys and safeguarding the public will be a complete failure when the Tennessee Supreme Court attempts "lower barriers to entry." Ease of entry into the "lawyer" profession means lowering the standards of service. If it means less to become a Tennessee attorney, then the Supreme Court will create less service, less professionalism, and less competency.

I'm honored to be an attorney, but the job is not for the faint of mind nor heart. It takes hard work to remain in private practice, and the challenges are faced daily for private practice attorneys. We cannot rely on a government check each week or every two (2) weeks. To maintain a functional law firm, attorneys must be the marketers, sales persons, psychologists, production workers, and then answer to the Supreme Court when the crazy client makes some unfounded disciplinary claim because the client didn't deserve any more than awarded at trial. Then the attorney goes without payment unless the attorney then assumes the role of collection agent (because the attorney is not on the government dole and has to earn money by serving clients).

Lowering barriers will result in more unsuspecting and unknowing clients losing their life, child, life savings, everything they had, etc., etc., etc., because the Supreme Court wanted to reduce attorney fees across Tennessee. Reduce fees and/or the

opportunity for the attorney to earn a living will reduce the number of qualified attorneys. Maybe it already too easy to be a Tennessee lawyer?

3. I'm not an ABA fan nor a "follow whatever the Northeast liberals decide to do" fellow, but there should be standards. Follow the ABA accreditation and/or create the Tennessee accreditation, but don't lower standards nor eliminate standards. "Standards" is what it means to be a lawyer.

Why not cause Tennessee to be the standard bearer. While Illinois and Massachusetts lower standards, Tennessee has the opportunity to maintain the legal tradition of a higher standard? How about higher "barriers"? I'm proud of my alma mater when I see that the LSAT scores and undergraduate GPA's surpass those of other law schools. Why would you want otherwise?

You get what you accept, and if you've been wearing a robe long enough to believe the high ground is lower standards, lower pragmatic barriers, and lower qualified attorneys in Tennessee, its about time to retire from the Supreme Court. As Jeff Foxworthy might say, "here's your sign."

4. "Alternative pathways for admission to the bar" equates to lower standards and lower quality legal representation. The Supreme Court should strive for a higher, more lofty ideals. What are you really looking for? Ask yourself that and be true to yourself.

5. **"Admission for those licensed in other states" has been a given for years in Tennessee. The Supreme Court has failed to police and/or enforce this admission standard. Attorneys moving from States that require every licensee to take the Bar Exam are admitted freely in Tennessee under the guise of "reciprocity."**

For many years, Florida has required the taking of the Florida Bar Exam by every attorney applying for licensing in Florida (i.e., no reciprocity), yet the Tennessee Supreme Court allows admission for applicants from Florida without taking the Tennessee Bar Exam. The Supreme Court has failed to honor their respective Oath by allowing "those licensed in other states" to receive a Tennessee license without more than a mere application. I worked hard (I believe) for my Tennessee law license and I'm extremely proud of my Tennessee Law License, but the Tennessee Supreme Court (or whomever polices this licensing method) has watered-down my Tennessee Law License for many years by ignoring the "reciprocity" standard.

6. If you really desire to destroy the legal profession, then allow non-lawyer ownership of law firms or fee sharing with non-lawyers. At this point I'm assuming that the Supreme Court sent this survey as a method for bolstering support for denying the suggestions made in the query.

Bring on the Charlatans. Non-lawyer ownership of law firms sounds disgraceful.

7. Replace lawyers with paraprofessionals? Let's have one seat on the Supreme Court for a paraprofessional. Enough said.

Scott D. Hall (BPR # 014874)
374 Forks of the River Parkway
Sevierville, Tennessee 37862
(865) 428-9900
scott@scottdhallesq.com
www.scottdhallesq.com