

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



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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*

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Augusto J Martinez, Director

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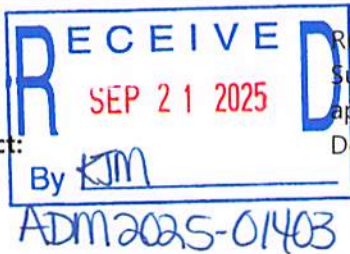
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Kim Meador

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



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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
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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



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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.

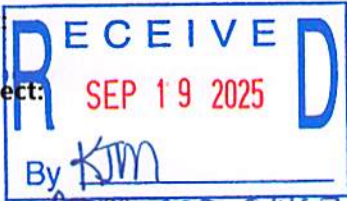
Please take these observations into consideration as you consider options for opening the bar to additional types of training.

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

Lillian Burke, MD
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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



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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

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Sincerely,



Terry C. Cox
Attorney
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901-853-3500
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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



ADM2025-01403

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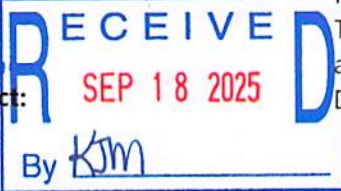
How about doing away with the privilege tax? We definitely do not need to reduce the educational requirements for lawyers. If you expect lawyers to charge less perhaps law school should cost less. I am primarily a child welfare attorney and make very little money on court appointed cases and I feel like 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



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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



ADM2025-01403

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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.

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