

1 ILLINOIS SUPREME COURT RULES COMMITTEE
2 PUBLIC HEARING

3 PROPOSALS: 24-15
4 24-16
5 24-17
6 24-18
7 25-01
8 25-02
9 25-03
10 25-04

11 Report of proceedings had at the hearing in the
12 above-entitled cause before the Supreme Court Rules
13 Committee, commencing at 10:00 a.m., on the 23rd day of
14 April, 2025.

15 APPEARANCES:

16 JAMES A. HANSEN - CHAIR
17 ANDRE GRANT
18 RICHAR HARDEN
19 JENNIFER B. JOHNSON
20 DAVID R. NAVARRO
21 DANIEL M. KOFIN
22 TRACIE PORTER
23 MIRANDA L. SOUCIE
24 JOHN SPESIA
25 MARY K. O'BRIEN
26 KETH H. BEYLER
27 MARTIN DOLAN

1 CHAIR HANSEN: Welcome everybody to the Illinois
2 Supreme Court Rules Committee public hearing. Today is
3 Wednesday, April 23, 2025. Welcome to all the
4 Committee members and Justice O'Brien, thank you. Our
5 new Committee members Justice Porter and Mr. Kotin.

6 The hearing today will get started. I will
7 let the speakers who are on the list know that we are
8 on a schedule. You each will have ten minutes. I hate
9 to be rude, but that's part of the job. And if you
10 start going over, we'll have to cut you off.

11 The Committee members may have some questions
12 for you. Please be ready to answer those if we have
13 any. We have been provided, as you can imagine, all
14 the written materials. We have been provided the
15 written comments that were also submitted, so we are
16 familiar with the item on the agenda.

17 That being said, I will call out the speaker
18 and the proposal that you are here to speak on, and we
19 will get started. Before we do, I think today is
20 Administrative Assistant's Day and -- which is saying
21 there isn't probably anyone in this room that isn't
22 here but for the work of a good assistant or two. So
23 do your best to thank them along the way, and I was
24 nice enough to say thanks to mine before I left last

1 night. That being said, we will get started.

2 The first proposal on the agenda is 24-15
3 which is amending Supreme Court Rule 703 on educational
4 requirements. And our first speaker is Lexie Rice
5 representing the Board of Admissions. Good Morning.

6 MS. RICE: Good morning. There we go. My name is
7 Lexie Rice. I'm the staff attorney with the Illinois
8 Board of Admissions to the Bar. Here with me is Eric
9 Lohrenz who is the Director of Admissions to Illinois
10 Board of Admissions to the Bar. So I'm here to speak
11 about two proposals. The first is 24-15.

12 CHAIR HANSEN: Yes. And I'll just take you're
13 also speaking on 24-16?

14 MS. RICE: Yes, that's correct.

15 CHAIR HANSEN: That's amending Rule 704 on the
16 qualification on examination.

17 MS. RICE: That's correct. Yes.

18 So first, 24-15, we are seeking to amend
19 Supreme Court Rule 703 which pertains to the
20 educational requirements required to seek admission to
21 the bar on examination. The memo that we submitted
22 explains our proposal in greater detail. But briefly
23 we are -- the Board is seeking to eliminate reference
24 to the preliminary and college work as that language is

1 redundant with the ABA requirements. And the Board
2 seeks to define what is meant by "first degree in law"
3 as a JD or an LLB; a juris doctor or bachelor's of law
4 and to clarify that an LML or an SJD is not a first
5 degree in law.

6 This is not a substantive change but rather
7 meant to pre-emp questions from perspective applicants
8 regarding what a first degree in law means. Mostly,
9 this kind of question comes from our foreign license
10 applicants who may not be familiar with the U.S. legal
11 educational system. We get this question enough that
12 we felt it warranted a specific call out in the rule.

13 From my understanding, the only response to
14 this proposal was from the ISBA who expressed their
15 support for the proposal. If the Committee has any
16 questions pertaining to Proposal 24-15 I'd be happy to
17 address those now.

18 CHAIR HANSEN: I only have one.

19 MS. RICE: Sure.

20 CHAIR HANSEN: Can you get an LLM without a JD?
21 How is that possible that that could be your first
22 degree?

23 MS. RICE: Well, if you are licensed and have
24 gotten your education in a foreign country, you can

1 then come to the U.S. and get an LLM from an ABA
2 institution.

3 CHAIR HANSEN: Okay. We don't -- Is it currently
4 that the rule does not count that out of country degree
5 as a first degree as to (inaudible) --

6 MS. RICE: It's not a -- It wouldn't be from an --
7 a first degree in law from an ABA accredit institution.

8 CHAIR HANSEN: Okay. All right. Thank you.

9 MS. RICE: Are there any other questions
10 pertaining to this proposal? Okay.

11 Well, then I will move on to the next which
12 is Proposal 24-16. The Board is seeking to amend rule
13 704 which pertains to qualification on examination,
14 otherwise know as the bar exam. Again, our memorandum
15 submitted explains in greater detail but briefly the
16 Board as suggested various changes in light of the
17 upcoming transition to the Next Gen exam which Illinois
18 has announced that it plans to administer beginning in
19 2028. And the deep commission of the uniform bar exam
20 or otherwise known as the UBE, which Illinois currently
21 offers to applicants.

22 In light of this upcoming transition, the
23 Board recommends revising the language of Rule 704(d)
24 to more broadly describe the bar exam, rather than

1 refer to a specific exam. This change would allow for
2 the selection of the specific version of the exam and
3 other details related to the administration of the exam
4 to be incorporated into the Illinois Board of Admission
5 to the bar rules of procedure rather than requiring
6 further -- excuse me -- rather than requiring further
7 amendments to Rule 704(d) as more details regarding the
8 Next Gen exam are determined.

9 The remaining proposed amendments are what we
10 consider clean-up amendments to tighten up the language
11 in the rule and to eliminate language that is no longer
12 necessary. Specifically, the Board seeks to define
13 NCBE as the abbreviation for the National Conference of
14 Bar Examiners in Rule 704(c) to clarify the
15 relationship between the Board and the court regarding
16 the setting of the passing score for the bar exam and
17 the professional responsibility exam and that's also
18 set in 704(c), and to eliminate the first clause of
19 704(d) which references the effective date of the rule.
20 This language is no longer necessary as the effective
21 date of adding Rule 704(f) -- or (d) was in 2007 which
22 was more than four years ago, and thus that
23 transitional language is no longer necessary.

24 I understand that two responses to this

1 proposal have been submitted. The first from the ISBA
2 supports the proposal. The second response was
3 submitted by a former employee of the Board. The
4 response does not take issue with any of the proposed
5 changes to Rule 704 but instead suggests an additional
6 change to Rule 704(f).

7 Rule 704(f) currently states a passing score
8 on the Illinois bar example is valid for four years
9 from the last date of examination. The response
10 proposes that Rule 704(f) be amended to state an
11 individual applicant's passing score is valid from the
12 date of the examination administered to the applicant.

13 The rationale for the suggested change is
14 that some applicants take the exam over an extended
15 number of days instead of the traditional two days.
16 The proposal suggests it would be more equitable to
17 extend the deadline for expiration of the scores to the
18 last date the individual applicant took the exam.

19 The Board has considered this proposal but
20 does not see a reason to change the Board's proposal
21 for a variety of reasons. First, the response is based
22 on an incorrect assumption about how the rule works.
23 Regardless of when an applicant finishes the exam, all
24 scores are released on the exact same day. Thus,

1 there's no disadvantage to those applicants who test
2 over four days instead of two.

3 In fact, the response would actually provide
4 an advantage to those applicants who test over an
5 extended day rather than leveling the playing field if
6 their score would then be valid for additional days
7 over the standard two-day applicant.

8 Second, to implement this change frankly
9 would be an administrative nightmare. The applicants
10 would have to identify themselves as someone who is
11 taken the exam over extended time which applicants
12 traditionally do not want to do. Then the -- our staff
13 would have to calculate -- would have to look up their
14 exam, see when they took it. It would just be a mess
15 to be honest.

16 Right now, all the applicants who are sitting
17 for the July 2025 exam, they know that their scores
18 will expire on the same date, on July 30th, 2029. And,
19 finally, this version of the rule has been in effect
20 for a long time, since 2007. It has worked for many
21 years, and it has never been an issue. There's just no
22 reason to adopt the change proposed in the response.

23 If the board were to adopt any change,
24 perhaps it would change the last date of the

1 examination -- that's the language in the rule -- to
2 state the Wednesday of the examination similar to the
3 change proposed in Proposal 24-17. But, otherwise,
4 it's really just not necessary.

5 If there are any questions about this
6 proposal, I'd be happy to address them now.

7 CHAIR HANSEN: Any Committee members have any
8 questions?

9 I have one.

10 MS. RICE: Sure. Of course.

11 CHAIR HANSEN: On the -- It's more of a
12 clarification. So in Section 1 you're deleting the
13 specific reference to the uniform bar examination based
14 on a test that is not going to (inaudible) 2028,
15 correct?

16 MS. RICE: Right. Right. So instead of a
17 specifically identifying the UBE, we are taking out
18 that specific identification in anticipation of
19 adopting the Next Gen exam.

20 CHAIR HANSEN: I just wanted to get out very far
21 ahead of the Next Gen even though it doesn't go into
22 place in 2028.

23 MS. RICE: Right. We're just looking forward,
24 because we're going to be over the course of the next

1 year determining what the cut score will be and
2 determining when we will, in fact, first administer
3 that. So because this rule process does take some
4 time, we wanted to make sure that we are ahead of this
5 and can get that rule in place before we have to have
6 the rule in place.

7 CHAIR HANSEN: Thank you.

8 MS. RICE: Sure. Thank you very much for your
9 time.

10 CHAIR HANSEN: Eric Lohrenz will be talking about
11 Proposal 24-17 and 24-18. Again, these talk about Rule
12 704(a) and 706.

13 MR. LOHRENZ: Thank you. Good morning, Justice
14 O'Brien and members of the rules Committee. I'm Eric
15 Lohrenz, and I'm the Director of Administration for the
16 Board of Admissions to the Bar. As you stated I will
17 be talking about Proposals 24-17 and 24-18.

18 The first proposal, 24-17, proposes
19 amendments to rule 704(a) which is the rule for
20 admission by transferred UBE score. The Board of
21 Admissions is proposing to amend the rule in two main
22 respects and is also proposing a couple clean-up
23 amendments.

24 The first main respect in which we want to

1 amend 704(a) is to clarify in paragraph A of the rule
2 the date on which a score on the UBE is deemed to be
3 attained, and the date we are proposing for that is the
4 Wednesday of the week in which the bar exam was
5 administered.

6 The reason for this change, as Ms. Rice
7 alluded to, is to provide certainty to all applicants
8 as to the date on which their score will expire. They
9 will all know what Wednesday was the last day of their
10 bar exam. Again, Mr. -- There were comments by
11 Mr. Schuster with respect to paragraph A of Rule 704(a)
12 again to extend the period for those who are
13 nonstandard examinees who might need another day or two
14 to complete the exam.

15 And for the same reasons that Ms. Rice
16 explained, there -- the Board does not see any reason
17 to make that change. We have certainty -- we will have
18 certainty with the rule that we propose and without
19 that we would incur the administrative burdens of
20 individually tracking the length of time a test was
21 administered to each applicant. Moreover for Rule
22 704(a), the tests are administered in another
23 jurisdiction which would add another layer of
24 administrative burden. And for the same reasons that

1 Ms. Rice explained, really all applicants receive their
2 score on the same day and -- so it would -- they would
3 have the same period of time from the date they
4 received their score until the four years after the
5 Wednesday of the week in which they took the bar to
6 submit a request to transfer their score. So that's
7 the first main proposal.

8 Are there any questions on that aspect of our
9 proposal regarding Rule 704(a)?

10 CHAIR HANSEN: Judge Porter.

11 JUDGE PORTER: Just one question. Historically,
12 has it always been on Wednesday or do these rules
13 provide you flexibility to give those scores beyond
14 that Wednesday say if there's administrative issue or
15 otherwise?

16 MR. LOHRENZ: The bar exam is always administered
17 on the last Tuesday and Wednesday of February or July
18 if that was your question. In terms of when we give
19 the scores out, that's not for weeks or months after.
20 For the February exam, we typically release -- or the
21 scores are typically released in early April. And for
22 the July bar exam, they're typically released in
23 October. But, again, these are different jurisdictions
24 that we're talking about so their schedule may carry.

1 JUDGE PORTER: I guess more specifically by
2 putting a specific day of the week, does that give you
3 flexibility to say do it on Thursday or Friday? Do the
4 rules speak to giving you some discretion of
5 flexibility if we put a hard and fast day of the week
6 in the rule?

7 MR. LOHRENZ: In terms of flexibility, the court
8 has the inherent authority to address special
9 circumstances by way of petition. And what would
10 happen is, somebody who felt that they needed an
11 additional period of time would submit a petition to
12 the board, grant -- requesting that relief. I'm
13 sorry -- we would submit a petition to the court, and
14 those petitions then are sent over to the Board. The
15 Board considers them and makes a recommendation to the
16 court.

17 CHAIR HANSEN: Justice Navarro.

18 JUSTICE NAVARRO: So I guess the question then --
19 or the reason that we don't go with the date the scores
20 are released is because you said that day changes by
21 jurs- -- or varies by jurisdiction?

22 MR. LOHRENZ: Yes. And that would create another
23 administrative burden in track -- and even Illinois
24 depending on the days of the week that, you know, 1st

1 of April is -- as target date. But it may fall on a
2 Saturday or Sunday, and so we -- the easy date is just
3 to pick a date that everybody knows and that will be
4 the Wednesday of the bar exam week.

5 JUSTICE NAVARRO: Which is always like you said
6 the last Tuesday and Wednesday --

7 MR. LOHRENZ: Exactly.

8 JUSTICE NAVARRO: -- (inaudible) last Tuesday and
9 Wednesday of February.

10 MR. LOHRENZ: Exactly.

11 All right. If there are no more questions
12 about that aspect of our proposal, I will turn to the
13 second main respect in which the Board is asking to
14 amend rule 704(a), and that would be by expanding Rule
15 704(a) paragraph B to allow certain graduates of
16 foreign law schools to transfer their UBE score to
17 Illinois.

18 At present Illinois allows both graduates of
19 ABA approved law schools and graduates of foreign law
20 schools to sit for the bar exam. Foreign law school
21 graduates have to meet additional requirements
22 primarily concerning having five -- having practiced
23 law under one of their -- under a license which could
24 be a U.S. license or their foreign license for five

1 other preceding seven years.

2 However, on the side of allowing transfer
3 scores of -- under Rule 704(a), the current rule only
4 limits that to graduates of ABA approved law schools.
5 So the reason for this proposed change is to create
6 symmetry between those who can get admitted to the bar
7 in Illinois by taking the Illinois version of the UBE
8 which is the same as everybody, but the Illinois
9 administration of the UBE or the administration in
10 other jurisdiction.

11 Does anybody have any questions about that?

12 CHAIR HANSEN: No.

13 MR. LOHRENZ: Okay. And, finally, with respect to
14 Proposal 24-17, the Board is proposing a couple of
15 minor clean-up amendments to rule 704(e) and (f). And
16 the first change again has to do with removing some
17 transitional language that no longer applies. This is
18 rule 704(a) paragraph E which required that a person
19 shall not be eligible for admission prior to
20 November 7, 2019. We're now well passed that.

21 And then the other clean-up change is to add
22 a clarification at the end of the whole paragraph F
23 which is now going to be paragraph E, stating that in
24 addition to the requirements set forth in this rule in

1 paragraph E the applicant must satisfy all of their
2 applicant -- other requirements of Rule 704(a).

3 So any more questions on Rule 704(a) or this
4 proposal?

5 CHAIR HANSEN: No. Thank you.

6 MR. LOHRENZ: The Board's fourth and final
7 proposal is Proposal 24-18, and this proposes rule
8 amendments to Illinois Supreme Court Rules 706 and 716.
9 And Proposal 24-18 proposes to amend the Rule 706 in
10 forming respects, one of which concerns the free
11 structure for applications under Rule 716 related to
12 limited admission of house counsel. And for the change
13 in fee structure under Rule 716, the Board is also
14 proposing complementary changes to Rule 716 itself.

15 The first main aspect in which the Board
16 proposes to amend Rule 706 is to adjust the fees for
17 first time and repeat applicants to sit for the
18 Illinois Bar examination. That includes two fee
19 components. One being the examination fee and the
20 other being the character and fitness registration fee.

21 The application fee -- I'm sorry -- the
22 character and fitness registration fee generally is
23 only paid one time. And even if an applicant fails the
24 bar, they would not have to pay the registration fee

1 again. Rather they would just have to pay a
2 re-examination fee.

3 The key points about this proposal to
4 increase these fees is that the fees have not been
5 changed for -- have not been increased since the 2014
6 for the bar exam fees, and since at least 2004 for the
7 character and fitness registration fee. And the fee
8 increases that we are proposing are less than the
9 consumer price index over that same period of time.

10 In support of the proposed increases, the
11 Board notes that their costs have increased for all
12 aspects of the administering admissions rules in the
13 intervening years since the fees were last increased.
14 And the cost of the increased include overhead
15 supplies, equipment, employee cost, and investigation
16 cost. The Board therefore feels it is necessary to
17 propose these changes and fees pursuant to Rule 706.

18 CHAIR HANSEN: So if you fail the bar, will you
19 have to then pay the character and fitness fee again as
20 well or is it --

21 MR. LOHRENZ: No, just -- just the re-examination
22 fee. The character and fitness process, the way the
23 character and fitness process works is that if an
24 applicant fails the bar, we will put processing of

1 their character and fitness application on hold. But
2 once they file -- once they submit an application to
3 take the next bar exam or a subsequent bar exam, the
4 processing of the character and fitness application
5 will resume with no additional charges to the
6 applicant.

7 The second main respect in which the Board
8 proposes to amend Rule 706 is to amend Rule 706(e) to
9 create a bifurcated fee structure for admission on
10 motion Rule 705. And currently the fee for a Rule 705
11 application for admission on motion is \$1,500. That is
12 paid all at once but only after an applicant has
13 submitted a preliminary questionnaire which basically
14 is an offer of proof that they can meet the
15 experiential educational requirements for admission on
16 motion of which the character and fitness requirements
17 are handled in the ordinary course.

18 What happens -- what we find is that Board
19 staff spend a significant amount of time reviewing
20 these preliminary questionnaires. And even if an
21 applicant submits a questionnaire that shows that they
22 clearly aren't going to pass, we sometimes will -- or
23 I'm sorry -- clearly aren't going to qualify for the
24 admission on motion, we may offer them some

1 suggestions. Like, you just took the bar exam in New
2 York two years ago, and it looks like your score is
3 high enough. Perhaps you should consider applying
4 under Rule 704(a) or it looks like you're just coming
5 into Illinois to work for a corporation. Have you
6 considered applying under Rule 716?

7 So we do spend some time reviewing these
8 preliminary questionnaires, and the applicants get some
9 benefit from it. But what happens is, we don't get any
10 fees to offset those administrative expenditures of
11 time and resources until they file an actual full
12 application under Rule 705.

13 So the reason -- so the idea behind the
14 bifurcated fee structure is to allow the Board to
15 re-coop some of its administrative costs and without
16 increasing the overall cost to the applicant.

17 CHAIR HANSEN: We have one question that was on
18 the prior amendment.

19 MS. SOUCIE: Thank you. Miranda Soucie. Thank
20 you again for your explanations on the fees. I
21 understand that the increased enhanced fees are below
22 the consumer price index.

23 MR. LOHRENZ: Yes.

24 MS. SOUCIE: But with respect to sort of your

1 analysis -- the Board's analysis, have you looked at
2 what the anticipated budgetary constraints will be over
3 maybe the next three to five years to see if this will
4 account for what we anticipate the increased budget
5 will be in that time frame?

6 MR. LOHRENZ: Yes. We have looked at the next
7 three to five years. I will say that we have not
8 factored in any additional costs for Next Gen. The
9 Next Gen bar exam which will become the Illinois Bar
10 Exam in 2028.

11 Currently, the National Conference of Bar
12 Examiners has told us that they're current pricing
13 structure for Next Gen will remain in place through at
14 least 2028. And even if we -- we feel that we can,
15 with the Board's reserves, we can handle the increased
16 cost of Next Gen through at least 2029 but beyond that
17 we may have to -- we may have to come back for a
18 further fee increase which would be driven by the Next
19 Gen costs.

20 And I would add that one aspect of Next Gen
21 is that it is an entirely online examination, and
22 presently we do not provide wi-fi capabilities for
23 applicants for examinees at our test sites. We will
24 have to do that going forward.

1 NCBE and its vendor are offering assistance
2 and counseling advises as to how to meet those
3 requirements, but until we -- until we get a little bit
4 closer and until -- I'm sorry. NCBE, I should say, is
5 still doing some beta testing to refine what those
6 wire -- what the wireless internet requirements will be
7 for uploading and downloading the exam.

8 So as soon as that information becomes
9 available we will start to work with our exam sites to
10 see what the needs will be to administer an online exam
11 in those settings and that would -- once we have that
12 information, we will factor it into our budget.

13 CHAIR HANSEN: Thank you. Anything else in
14 closing?

15 MR. LOHRENZ: No -- Well, I guess, I will respond
16 to Mr. Schuster's comments quickly. He has propos --
17 he suggests that perhaps the proposed amendment to
18 bifurcated the fee structure for Rule 705 should wait
19 until the Board moves forward with an amendment of Rule
20 705 itself. And the Board has considered that
21 suggestion but the changes we are proposing right now
22 are -- do not substantively change the requirements for
23 Rule 705. They are demonstrative changes that we feel
24 are -- can be addressed through the changed Rule 706.

1 CHAIR HANSEN: Thank you. Appreciate it.

2 Next is Justice Rochford to discuss proposals
3 25-01 and 25-02.

4 JUSTICE ROCHFORD: Good morning. Mary K.
5 Rochford, I'm a member of the Appellate Administrative
6 Committee. I'm here on behalf of the Committee, its
7 members, and it's chairs, Justice Ritina(phonetic)
8 Lampkin. I am here to speak about 25-01 and 25-02.
9 These proposals were approved by the Appellate
10 Administrative Committee without dissent. Our
11 Committee has representatives from each of the
12 districts.

13 The rules community has received
14 communications from Justice Doridy(phonetic) who is a
15 member of the Appellated Committee. He gave you those
16 comments in his personal capacity, but I am in full
17 agreement with his comments as is the Committee.

18 If you don't mind, I think I will start with
19 25-02. It has been supported by the ISBA, the
20 Appellate Lawyer's Association, the Public Defender's
21 Office, and the Office of the State Appellate Defender.
22 This amendment seeks to make a change to Rule 23 which
23 wo- -- to delete the requirement that a copy of Rule 23
24 did -- does -- would no longer be needed to be given.

1 We think that the Rule 23s are now universally
2 available on our court website. The website makes it
3 fairly easy to find those Rule 23s, and they're also
4 available on public research sites. So that is our
5 proposed change. If there are any questions I'll be
6 glad to ...

7 CHAIR HANSEN: No.

8 JUSTICE ROCHFORD: Okay. So then I would like to
9 go on to Proposal 25-01. 25-01 suggests adding a
10 Section 13-8 -- or section -- I'm sorry -- a subsection
11 A to rule 13 and also proposes corresponding comments.
12 This proposal also makes proposed changes to Rule
13 606(a) and its Rule 606(d). The changes to -- we are
14 proposing to Rule 13 go hand-in-hand with the changes
15 to Rule 606(a).

16 Now, this proposal has been supported by the
17 IS -- Public Defenders. The ISBA raised an issue as to
18 some clarity needed to Rule 13. The Appellate Lawyers
19 Association has suggested a change to -- to our
20 proposed change to Rule 13 which may correct the
21 ambiguity that the ISBA raised, and it also has
22 suggested that changes be made to Rule 605(a)(1) and
23 the admonishments that would be needed to be given by
24 the Circuit Court.

1 The Committee has not addressed these
2 proposed changes by the Appellate Lawyers Association.
3 But I'm speaking on my behalf only, I see merit to the
4 appellate lawyers suggestions and maybe I will address
5 them when I talk about what exactly the Committee is
6 proposing to as to 25-01.

7 We seek to amend Rule 13 to state that the --
8 an attorney's period of representation continues until
9 the time for filing of a notice of appeal from the
10 final judgment. We made this rep- -- proposed change
11 because we were also suggesting a change to Rule 606(a)
12 to amend that rule just to provide that a trial court
13 clerk would need to prepare, sign, and file a notices
14 of appeal only when the defendant does not have an
15 attorney and after being advised of his appellate
16 rights request in open court or later in writing that
17 they wish to appeal.

18 We felt that this amendment balances the
19 limitations of the role of the trial court clerk but
20 also protects an unrepresented defendant's right to
21 appeal. Because we were making this suggested change,
22 we also suggested the change to rule 13(g) -- 13(a)
23 which would state that the period of representation of
24 an attorney continues until the time for filing notice

1 of appeal from the final judgment.

2 The appellate lawyers has suggested some
3 changes to that which I don't want to speak on their
4 behalf but would say that the -- it would continue
5 until the time for filing the notice of appeal or the
6 notice of appeal is actually filed. I'm paraphrasing
7 and I don't mean to step on their toes. But I think
8 that would eliminate the concern of the ISBA that if a
9 notice of appeal is filed early in that period of the
10 30 days in which a notice of appeal is required to be
11 filed, that they still need to continue their
12 representation and as the appellate lawyers point out
13 file a docketing statement.

14 So I think the language that the appellate
15 lawyers are suggesting would help clarify that concern
16 of the ISBA. So if -- and we also suggested an
17 amendment to Rule 606(d) which simplifies the current
18 language, deletes redundancies, and just clearly states
19 forth that the notices of appeal must be done in
20 accordance with the forms in Article 6. So if I have
21 sufficiently confused you, I'm sorry.

22 CHAIR HANSEN: Yeah, I'll try and un- --

23 JUSTICE ROCHFORD: I tried to go in different
24 directions between our proposals and the suggestions

1 from --

2 CHAIR HANSEN: Well, I'm going to assume
3 Mr. Horvath will be addressing 25-02. But one of my
4 concerns is that issue under the change, the
5 representation continues through the time for filing
6 the notice of appeal through final judgment, that
7 per- -- that window. If I am the attorney and I filed
8 a notice of appeal, that's my obligation. I'm still
9 representing the client until that point in time. I
10 have concern then what happens to me and my obligation
11 once I've done that.

12 I then need to file my motion to withdraw. I
13 then need to go through all those steps even though
14 I've protected the right for the appeal? So I'm
15 representing the client. I got to do it through the
16 notice of appeal. To protect my backside, I better
17 file that notice to make sure I'm not -- just to make
18 sure everything is okay, but I don't want to keep going
19 on.

20 I did this to protect the client I was
21 representing, but we have a clear understanding I'm not
22 going to do anything going forward. It's now incumbent
23 on me to do a lot more to get out than it was before I
24 file that motion of appeal.

1 JUSTICE ROCHFORD: Well, with the Appellate
2 Lawyer's Association suggested change addresses that
3 concern of yours.

4 CHAIR HANSEN: Okay. Fair enough. I'll wait for
5 him to step on up to the podium.

6 JUSTICE ROCHFORD: It clarifies that it would end
7 either at the end of the period for filing the notice
8 of appeal or at the time the notice of appeal was
9 filed.

10 CHAIR HANSEN: Okay. Andre.

11 MR. GRANT: Just following up on what you said.
12 One of the practices we've been doing at least in the
13 criminal division is at the time that we filed the
14 notice of appeal to also file a request for the
15 appointment of the Appellate Defender's Office, I mean,
16 just to cover our backside. Because once you file that
17 notice of appeal you, kind of -- you, kind of, stuck
18 there for a minute. So how do I get out now? And
19 then, the way that we've been doing it is to
20 simultaneously file the notice requesting that the
21 appellate defender be appointed. I don't know if it's
22 worked, but we've been doing that.

23 JUSTICE ROCHFORD: Would -- again, I don't --
24 obviously, I don't think that practice would

1 necessarily need to change under our suggested
2 amendment but the appellate lawyers maybe again
3 suggested change would address that as well. You're
4 doing it simultaneously. Their suggestion is the --
5 upon the filing of notice of appeal your representation
6 would end. But the better practice probably would be
7 to continue what is being done to also seek --

8 MR. GRANT: Just one more question, Justice. Does
9 the rules state that, that once you file the notice of
10 appeal your representation ends?

11 JUSTICE ROCHFORD: At our suggested change was
12 that the representation should continue until the time
13 for filing of notice of appeal from the filed judgment.
14 The appellate lawyers are suggesting that because the
15 notice of appeal is often filed before the end of that
16 30-day period and that 30-day period also covers the
17 requirement filing a docketing statement. The better
18 wording may be that it ends either upon the filing of
19 the notice of appeal or the expiration of the time.

20 So based on the concern that was raised also
21 by the ISBA and in my personal capacity, I'm saying
22 that maybe the appellate lawyers suggested changes may
23 address the concerns that are raised today and in the
24 ISBA response.

1 CHAIR HANSEN: Any other questions?

2 Okay. Thank you.

3 JUSTICE ROCHFORD: Thank you for your time.

4 CHAIR HANSEN: We eagerly await Mr. Horvath to
5 counter that.

6 JUSTICE ROCHFORD: I'm sure he'll be kind as to
7 the -- thank you.

8 CHAIR HANSEN: Okay. Next we have Judge Ortiz or
9 designee from the Access to Justice Commission to talk
10 about proposal 25-04.

11 JUSTICE TAILOR: Good morning. My name is Sanjay
12 Tailor. I'm here in my capacity as a Commissioner of
13 the Access to Justice Commission on behalf of Judge
14 Ortiz, the chair of the commission.

15 Before you this morning is a proposal by the
16 Access to Justice Commission to amend Supreme Court
17 Rule 9. This proposal has been vetted by the Supreme
18 Courts E-business policy board. They've made some
19 suggestions. We've incorporated those suggestions into
20 the proposal.

21 The amendments are intended to address issues
22 that -- to stakeholders are having -- one is
23 self-represent litigants, SRLs, and those who assist
24 SRLs. We call them our justice partners, for example,

1 Illinois court help, courts navigator at work. These
2 recommendations are based on the study that was done in
3 2022 which we referenced in the letter to Ms. Murphy.

4 The proposal seeks to expand exemptions that
5 are available to SRLs. And at a very high level, the
6 revisions to Rule 9, specifically subsection C, go to
7 the structure, and it's divided into six parts
8 documents that may not be e-filed. That, for example,
9 is an original will -- on original will cannot be --
10 the requirement that an original will be filed -- be
11 filed cannot be satisfied by e-filing it.

12 And then, there are certain documents that
13 are automatically exempt from e-filing. For example --
14 and these are -- none of these are being changed, but
15 just, for example, documents filed by someone who is
16 incarcerated in this -- SLR who is incarcerated. The
17 real substance is in the subsection that addresses
18 documents that are exempt from e-filing upon good cause
19 shown by certification. And here we propose to expand
20 the -- what qualifies as good cause.

21 And this would include, for example, the
22 documents filed by a self-represent litigant who is not
23 an attorney. And I'll explain that in a moment. But
24 an SRL who does not have computer literacy, who lacks

1 the technology -- the technological literacy to use the
2 e-filing system, doesn't have an e-mail account,
3 doesn't have credit or debit card or bank account or
4 simply has tried. And I think we, sort of, have all
5 been that situation where sometimes it just does not
6 work for us and, and so there's an exemption for that
7 as well.

8 I had mentioned the carve-out for attorneys.
9 What we are told by our friends at the E-business
10 Policy Advisory Board that many attorneys use this
11 exception when they shouldn't be using it. Because as
12 we all know, our rules of professional responsibility
13 require that we maintain technological proficiency, and
14 so we've carved out from the exemption licensed
15 attorneys.

16 That is the -- at a very high level, the
17 changes that we are proposing to help make it easier
18 for SRLs to access the justice system. We received
19 feedback, for example, from SRLs who say that this
20 process is intentionally hard and you're seeking to
21 either have me just go away or hire a lawyer. And so
22 we think that there's a need and a demand amongst the
23 SRL community, and that's what we're trying to do with
24 this proposal. I welcome any questions.

1 CHAIR HANSEN: I only have one kind of
2 administratively, I guess. In reading the rule to
3 qualify for certain things, you have to file the
4 certificate of exemption. And if you don't have access
5 to electronic method how are you filing the certificate
6 of exemption? Is the SRL bringing that down to the
7 court house and filing it that way then?

8 JUSTICE TAILOR: I think that's the expectation,
9 yes.

10 CHAIR HANSEN: Okay. Because, kind of,
11 self-defeating if they file a certificate of exemption
12 through an internet means and they don't have access to
13 the internet. So I assume it would have to be
14 therefore hand delivered to the court by the self --

15 JUSTICE TAILOR: Or mailed or whatever alternative
16 means there might be to file besides e-filing.

17 CHAIR HANSEN: The old way prior to e-filing.

18 JUSTICE TAILOR: Good old days.

19 CHAIR HANSEN: Thank you. Okay.

20 Anyone else have any questions? Yes, Judge.

21 JUDGE PORTER: In regard to the justice partners,
22 particularly Illinois Court Help, I know they do a
23 great job in helping SRLs in that these amendments will
24 provide even more focus on getting SRLs to e-file. Has

1 the either the commission or your policy -- E-business
2 Policy and Advisory Committee considered what the
3 cut-off is? Because SRLs might need to come in person,
4 and when they do that they can get more done than
5 trying to do e-filing and taking up resources. It's
6 just a thought whether the City, the commission, as
7 well as the Board considered that.

8 JUSTICE TAILOR: Well, I think the assumption is
9 that there are many SRLs that have the technology or
10 technological proficiency and would prefer to e-file so
11 they don't have to come down to the court and certainly
12 that's something they're encouraged to do, because you
13 know, our system is such that we want to encourage
14 e-filing.

15 But what this proposal really is intended to
16 address is those SRLs who simply don't have the ability
17 one for reason or the other to take advantage of the
18 e-filing system. So I'm not sure I answered your
19 question, but maybe I misunderstood it.

20 JUDGE PORTER: That gave some clarity. I won't
21 spend a lot of time on it, but I know there is a lot of
22 assistance already through Illinois Court Help and
23 other non-for-profits who help (inaudible) --

24 JUSTICE TAILOR: There are help desks in the

1 courthouse if that's what you're referring and
2 sometimes there's a benefit to come to court. But, you
3 know, there's benefits of course in e-filing as well,
4 so.

5 CHAIR HANSEN: Any other questions?

6 Thank you.

7 JUSTICE TAILOR: Thank you.

8 CHAIR HANSEN: Next up Justice Grant from the
9 E-Business Policy Board on proposal 25-03.

10 JUSTICE GRANT: Good morning, Chairman Hanson,
11 members of the Committee, Justice O'Brien. I'm Cindy
12 Grant. I am the vice chair of the advisory board. I
13 also serve as a clerk of the Supreme Court.

14 Last year the court approved a proposal
15 amending Rule 9. And in that proposal it provided that
16 clerks are to use the electronic filing rejection
17 standards which is a list of specific reasons for
18 clerks to use when rejecting an electronic filing. The
19 intent of the rule was to standardize the clerk's
20 rejection reasons and to ensure that filers understood
21 why their filing was being rejected.

22 Since then, the advisory board has learned
23 that some jurisdiction are adopting rules, adding
24 reasons that are not currently within the standards.

1 The proposed language before you makes it clear that
2 the clerks are only to use the language in the -- those
3 standards. On behalf of Justice Doherty(phonetic), the
4 chair of the advisory board, and the advisory board
5 itself, thank you for consideration. And I'm happy to
6 answer any questions.

7 CHAIR HANSEN: So, I guess, what's the mechanism
8 of enforcement when various clerks are not following,
9 you know, what's put out there? Is this trying to ring
10 that in?

11 JUSTICE GRANT: It is trying to ring that in, as
12 well as we're trying to occupy that ground of everybody
13 knows why -- what the -- the universe of rejection
14 reasons is. The advisory board is currently
15 considering other proposals dealing with what you're
16 asking, Chairman, which is what is the mechanism if a
17 clerk improperly rejects a document not within the
18 standards, what would be the remedy for the filer.

19 CHAIR HANSEN: The question I had is: What is the
20 means or methods of, kind of, disseminating here's a
21 new rule, we want to make sure you all follow it? Do
22 you all send that out to the clerks? Does somebody
23 else take it upon themselves to do that? Who does
24 that?

1 JUSTICE GRANT: AOIC actually when the rule became
2 effective September 1 we had two trainings with the
3 clerks as well as with the -- because the standards are
4 effective for the court's review so even the appellate
5 court clerks were subject to the training as well.

6 CHAIR HANSEN: Thank you. All right.

7 MR. HARDEN: Good morning. Can you give us any
8 examples of rules that clerks have put in place that
9 are outside of the uniform standards?

10 JUSTICE GRANT: Sure. One that we were
11 particularly concerned about is rejecting based on an
12 improper signature. The board had previously
13 considered that when adopting these standards. We did
14 not include it at that time so we were -- we were
15 concerned that was the impetus for this clarification.

16 CHAIR HANSEN: Any others?

17 | Okay. Thank you very much.

18 JUSTICE GRANT: Thank you.

19 CHAIR HANSEN: Next Mr. Horvath from the Appellate
20 Lawyer's Association. You will be talking on, I have
21 listed here, four proposals.

22 MR. HORVATH: That's correct, and thank you so
23 much.

24 CHAIR HANSEN: Pleasure seeing you again.

1 MR. HARDEN: Chair, pleasure seeing you as well.
2 Members of the Committee, good morning. The Appellate
3 Lawyers Association is always very enthusiastic to be
4 able to weigh in on these proposals so thank you for
5 indulging us.

6 There is has already been extensive very
7 detailed discussion about these. I'll try not to
8 repeat what others have said. I'll try not to repeat
9 what's in our letter, but I did want to highlight a
10 couple points that we feel very strongly about and
11 wanted to emphasize today for the Committee's benefit
12 and for the Committee's consideration.

13 And I'll cut right to the proposal 25-01,
14 part of it addresses Rule 13. And Justice Rochford
15 very capability addressed what that proposal was
16 intended to accomplish, and we are supportive of that
17 proposal. But there's a bit of an adjustment to it
18 that we've submitted to the Committee.

19 I think it's maybe not an overstatement to
20 say that three words that make any practicing lawyer's
21 blood pressure go up immediately are "notice of
22 appeal". Maybe the other three are "statute of
23 limitations." Notices of appeal are just something
24 that make practitioners inherently uneasy because there

1 are already so many pitfalls that can be stepped in
2 with respect to filing those notices. And this rule I
3 think is intended to create some clarity for
4 practitioners who are perhaps approaching the end of
5 their representation of a client.

6 But in our view, the clarity needed to go one
7 step further, and that's why we proposed some language
8 that we hope will make it crystal clear that if that
9 notice gets filed and there's still time within the
10 30-day deadline for filing the notice, the filing of
11 the notice terminates the representation or affectively
12 ends it.

13 And that's why we proposed some language that
14 clarifies that the representation will proceed as
15 follows. An attorneys appearance in the trial court
16 continues until the time for filing an appeal on behalf
17 of the client has expired or a notice of appeal has
18 been filed except as to limited scope appearances and
19 the like.

20 And the particular issue that our membership
21 was concerned with as appellate lawyers is the issue of
22 a docketing statement. When one files a docketing
23 statement in the Appellate Court, it's a representation
24 to the Appellate Court that there's some level of

1 ongoing involvement with the client.

2 So in our membership's view, it was important
3 to clarify that once that notice of appeal gets filed
4 there's no ongoing obligation to file a docketing
5 statement in the Appellate Court and further prolong a
6 representation that's intended to end.

7 So we think that the goal of the rule can be
8 achieved with some further clarity, and that's why we
9 would submit that proposed clarification to the
10 Committee for consideration. So that's our position
11 on -- on the Rule 13 aspect of Proposal 25-01, and I'm
12 happy to pause for moment and answer any questions
13 anyone may have.

14 MR. HARDEN: I do.

15 CHAIR HANSEN: Go ahead.

16 MR. HARDEN: Did your group consider including
17 language that says whichever is first in your
18 either/or?

19 MR. HORVATH: We -- we didn't actually contemplate
20 that specific language. But as I look at what we've
21 proposed, I can see how that may even further clarify
22 the concept that we're trying to communicate. So I
23 don't think that we would be opposed to such a
24 clarification if it makes it even clearer what the

1 delineation at the end of that representation is.

2 JUSTICE GRANT: Does the proposal include language
3 that termination ends with the filing of the notice of
4 appeal?

5 MR. HORVATH: I think to answer that question we
6 intended to address that by including the language "has
7 expired" or "a notice of appeal has been filed". And
8 so the concept that we were trying to communicate is
9 that once that notice get filed that's the end of the
10 representation. There's no further obligations
11 following that.

12 I -- perhaps there are other ways to clarify
13 it. The concern is: We want to make sure it's clear.
14 And so I don't mean to dismiss or shoot down any
15 alternative language, we just wanted to make sure that
16 within the comment period we flag the concept for the
17 Committee's consideration and gave the Committee some
18 food for thought.

19 JUSTICE GRANT: Can we make it clearer? I mean,
20 because the lawyer -- you know, like you pointed out,
21 once we get into making docketing statements, you put
22 yourself in the appeal process. Can't we make it
23 crystal clear that once that notice of appeal is filed
24 the termination of the representation by the attorney

1 ends. We can -- we don't want it ambiguous. We want
2 to be out.

3 MR. HORVATH: I think the ALA is always in favor
4 of further clarity. I think there may be room for even
5 further clarification here so long as that concept is
6 communicated. It's -- I think, it's in everyone's
7 interest, practitioners and the public at large, to
8 have a very good clarity in a rule like this one.

9 MS. SOUCIE: Andre, I had the exact same thought.

10 So as I was looking at this I'm concerned
11 about the practitioner who is not a regular appellate
12 lawyer who would come into this and not understand what
13 their next obligation is, and I know we talked about
14 that a little earlier with Justice Rochford. So I
15 wrote down the filing of a docketing statement with the
16 Appellate Court indicates an attorney's appearance will
17 continue in the Appellate Court. Something to that
18 extent. Just to make it clear that that -- because I
19 understand what you're saying, but that's not in what
20 the proposal is or what the alternative language is.

21 MR. HORVATH: I agree with the sentiment in that
22 it will prompt us to make this comment was the
23 discussion of a docketing statement. And perhaps we
24 should make explicit what was implicit in our thoughts

1 in bring the proposal together. So, again, I don't
2 mean to suggest that we have the panacea for this
3 entire issue but, you know, the ALA respectfully
4 submits that some clarification could help here, and we
5 think it would be a good clarification for all parties
6 concerned.

7 CHAIR HANSEN: What about instead of using the
8 word the repre- -- an attorney's appearance in a trial
9 court continues, it says instead an attorney's
10 appearance in the trial court ends at the time of
11 filing the appeal or -- so instead of using the word
12 "continues" you now have a finality word on the flip
13 side which is "ends".

14 MR. HORVATH: I suppose, Mr. Chair, the way of
15 clarifying that would be to say something to the affect
16 of an attorney's appearance in the trial court ends at
17 the time the notice of appeal was filed. And it's,
18 again, perhaps even further clarification of the
19 concept.

20 CHAIR HANSEN: Yeah. Okay.

21 Anyone else? Yes.

22 JUDGE PORTER: Didn't do appellate work but did
23 trial work and so if -- if the attorney is in the trial
24 court they may not continue. What if they find an

1 appellate lawyer to file the notice of appeal, would
2 they then end their representation by having another
3 lawyer step up? Has that been addressed in a rule?

4 MR. HORVATH: That's a very interesting and
5 specific fact pattern. I don't think we were
6 contemplating that when we looked at the language but
7 my solution to that issue would be that if trial
8 counsel retains appellate counsel to file notice that
9 too should end the representation of trial counsel. I
10 think that would be a situation where that type of
11 clarification would make sense.

12 If there are any further questions this, I'm
13 happy to address them. If not, I just want to make a
14 couple points on some of the other proposals.

15 CHAIR HANSEN: Go ahead.

16 MR. HORVATH: With regard to the second piece of
17 proposal 25-01, that's the Rule 606 proposal, that
18 concerns filing a notice of appeal by the clerk in
19 criminal cases. It's a specific procedure in criminal
20 cases. We have as we've indicated in our letter in
21 favor of that clarification and favor that aspect of
22 the proposal.

23 We just noted something for the Committee's
24 consideration with regard to amending the admonishments

1 that are put forward before the criminal court when --
2 when this situation arises. We didn't propose a formal
3 change. We just, sort of, alerted the Committee to the
4 possibility that there may be a need for further
5 clarification given this is a bit outside the scope of
6 the proposal regarding Rule 606 and then go to Rule
7 605.

8 But I wanted to emphasize that for the
9 Committee's considers. It was something that the ALA
10 wanted to flag for further discussion. I'm happy to
11 address any questions on that one as well. I'll pause
12 for a moment before I proceed.

13 CHAIR HANSEN: Go ahead.

14 MR. HORVATH: And then, with respect to proposal
15 number 25-02 which is another one that Justice Rochford
16 very capability addressed, I just wanted to briefly
17 note and reemphasize that it makes perfect sense to ALA
18 that you no longer should have to provide a copy of a
19 Rule 23 order given that in this day and age with
20 everything be electronically available on the Illinois
21 Supreme Court's website, it's just an outdated
22 requirement to the rule. So we're very supportive of
23 that proposed change in 25-02.

24 I'll also just briefly remark on 25-03. That

1 was the proposal that madam clerk Grant addressed about
2 the grounds for rejecting e-filings, if I could just
3 step back for a moment and say it is a great concern of
4 the ALAs membership to have clarity in the filing
5 rejection procedures that the Illinois Supreme Court
6 has on file. It is one of refrains we consistently get
7 from our members. They want to make sure they know
8 when a filing is going to be rejected, and I can relate
9 that to something we've been discussing here this
10 morning, "notices of appeal."

11 When Appellate lawyers file notices of appeal
12 I think it's become more customary to file them early
13 to avoid a situation where something is rejected after
14 a delay. But it's a topic of intense discussion among
15 Appellate lawyers and people who practice in the trial
16 courts across the state as well. So the ALA is very
17 supportive of clarifying and limiting the bases on
18 which a clerk's office can enter a rejection notice for
19 a filing that is made.

20 And I don't want to go beyond my time
21 allocation. With respect to proposal 25-04, Justice
22 Tailor very capably described this proposal. The ALA
23 has submitted a mark-up of the proposal that looked
24 very extensive -- and I reassure you it is not. The

1 only issue that ALA wants to flag with this proposal
2 which is the proposal about the procedures for e-filing
3 exemptions is that there's a well-established rule in
4 the code of civil procedure where in a probate
5 proceeding one has to file an original version of the
6 will with the clerk's office. And there's language in
7 the comment to proposal 25-04 and that would be in
8 comment D that suggest -- I don't think intentionally,
9 but suggests that an exempt SRL, exempt
10 self-represented litigant, could perhaps file an
11 electronic version of a will.

12 It's a highly technical issue but we -- we
13 flagged these changes to suggest that perhaps there
14 should be clarification to avoid any type of conflict
15 between the comments in D and the established rule
16 under the code of civil procedure regarding the filing
17 of original versions of the will with the clerk's
18 office.

19 So though there's a fair amount of red ink,
20 it's all just interlineations and changes that are
21 intended to address that very nuance point that arises
22 from the comment. I'm happy to address any questions
23 about that.

24 CHAIR HANSEN: I had one. Just so what is the

1 change or the recommendation you all offered on the
2 comment regarding the will? Because I was --

3 MR. HORVATH: The particular change that we're
4 trying to suggest here is on this comment D, we've
5 simply added a reference to -- under paragraph D. And
6 that means that we've distinguished between exceptions
7 to the requirement and exemptions from the requirement.
8 And we've suggested phrasing the filing of a will as an
9 exception to the e-filing requirement rather than as an
10 exemption. We think that rearrangement of the
11 categorization may clarify that this is not intended in
12 any way to conflict with the established practice under
13 the code of civil procedure for filing original wills
14 in probate.

15 CHAIR HANSEN: Any other questions?

16 Okay. Thank you very much.

17 MR. HORVATH: Thank you for your time. Have a
18 good day. Thank you.

19 CHAIR HANSEN: Ladies and gentlemen, that's our
20 last speaker for the morning on the proposals. We
21 thank you for your attendance. We will stand in
22 adjournment for our Committee meeting which will take
23 place here immediately after. Thank you everyone.
24 Have a good day.

1 (Which were all the proceedings had
2 in the above-entitled cause.)
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1 STATE OF ILLINOIS)
2)
2 COUNTY OF COOK)
3

4 Trixie L Schuzer, being first duly sworn, on oath
5 says that she is a Certified Shorthand Reporter doing
6 business in the City of Chicago, County of Cook, and
7 the State of Illinois.

8 That she reported in shorthand the proceedings had
9 at the foregoing hearing;

10 And that the foregoing is a true and correct
11 transcript of her shorthand notes so taken aforesaid
12 and contains all the proceedings had at the said status
13 hearing.

14 *Trixie Schuzer*
15

16 TRIIXIE L. SCHUZER, CSR
17

18
19 CSR. No. 084-004763
20

21 SUBSCRIBED AND SWORN TO
22 before me this 2nd day of
23 June, 2025.

24
25 *Allison L. Sedakis*
26 
27

28 NOTARY PUBLIC
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