

January 14, 2022

**BY ELECTRONIC SUBMISSION TO:**

The Supreme Court of Arizona  
Attn: Michelle Martinez  
Certification and Licensing Division

**Re: Comment on Proposed Changes to ACJA § 7-208**

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To Whom It May Concern,

This office represents the Arizona Association of Independent Paralegals ("AAIP"). Attached hereto is the objection to and comment on the proposed amendments to ACJA § 7-208(A) & (F)(1).

While AAIP has focused its comment on Subsections A and F, that is not to imply that AAIP does not also oppose other aspects of the proposed amendments. AAIP is also concerned ACJA § 1-201 was not complied with. AAIP questions whether a concise explanation of the need for the proposed changes was issued, whether a description of the entites affected by the proposed changes was issued, and believes there was a failure to distributed the proposed changes for the required 30 day comment period to the appropriate people and entities. *See ACJA § 1-201 (B) & (C)*.

The proposed amendments contained in ACJA § 7-208 pose a dire threat to members of AAIP. As explained in the comment, should the amendments be allowed to pass, the Arizona Supreme Court will not only walk back the strides made toward access to civil justice, but it will introduce a serious constitutional issue that AAIP will not hesitate to pursue if necessary.

That said, we appreciate the opportunity to explain and discuss these issues with the Court and Board in the coming weeks and months. Thank you for your attention and consideration.

Sincerely,



Nicholas Strom  
480.482.7359

*fowler* / *st.clair*