

Northwest Justice Project

Toll Free 1-888-201-1012
www.nwjustice.org

César E. Torres

June 13, 2014

Ms. Stefanie K. Davis
Assistant General Counsel
Legal Services Corporation
3333 K Street NW
Washington, D.C. 20007

Re: Comment on Proposed Rulemaking - 45 CFR Part 1614

Dear Ms. Davis

The Northwest Justice Project (NJP) is the LSC funded provider of legal services to the poor

Washington, D.C. 20007. We have carefully followed developments regarding

[REDACTED]



able to allocate costs associated with the attorney's volunteer time to PAI. The 1,000 hour per calendar year limit is incongruous with the stated purpose of the changed definition of "private attorney", which "explicitly contemplates that *any* attorney licensed or otherwise authorized...to practice law... may provide legal assistance to eligible clients through a recipient's PAI Program" (Emphasis added)

[REDACTED]

¹ As fully discussed in NJP's comments on the proposed 2015 Grant Assurance changes, Washington Rule of Professional Conduct (RPC) 1.6 strictly prohibits disclosure of client information related to the representation, is broader than other states' and federal law in this regard and expressly does not authorize disclosure "to comply with other law."

² The Washington State Bar Association's Chief Disciplinary Counsel has also provided LSC with his

[REDACTED]

available cost of living calculations, \$25,000 in 1983 equals approximately \$60,000 in 2014 dollars. NJP has had situations in which one lawyer or law firm has exceeded \$25,000 in costs for one case or combined with cases handled earlier in the year,

[REDACTED]