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**IN THE SUPREME COURT
STATE OF ARIZONA**

In the Matter of)	
)	Arizona Supreme Court
PETITION TO AMEND ARIZONA)	No. R-20-0007
SUPREME COURT RULE 38)	
)	COMMENT
_____)	

Pursuant to Rule 28, Rules of the Supreme Court of Arizona, David K. Byers, in his capacity as Administrative Director of the Administrative Office of the Courts, respectfully files this Comment for the Court’s consideration in the above-referenced rule petition.

If the Court is inclined to adopt the proposed amendments, it may wish to add two additional eligibility criteria for recent law graduates who apply to be certified limited practice graduates. The proposed additional criteria, which would be added the rule at subsection (c)(6)(A), as follows:

(v) not been convicted of a serious offense as defined in A.R.S. § 13-706; and

(vi) submits to the Committee on Character and Fitness an application in the form supplied by the Committee within 90 days of graduation.

¹ Mr. Byers filed the underlying petition in his capacity as a member of the Legal Services Delivery Task Force.

Respectfully submitted this 31st day of March, 2020.

By /s/ _____
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