

#018

From: Carol Ann Armenti <carolannarmenti@gmail.com>
Sent: Tuesday, September 15, 2015 12:00 PM
To: Comments Mailbox
Subject: Special Committee - Attorney Ethics and Admissions

RE: In House Practice by Foreign Lawyers

Perhaps this is a cavil, but I found the distinction between a "foreign" and non-foreign attorney unclear. For example, American Samoa, and Puerto Rico are both possessions/commonwealths of the United States. However, my - limited - understanding is that these jurisdictions possess their own constitutions.

For the purposes of this rule, it seems that such counsel are United States lawyers. Are they, then, out-of-state lawyers, though not members of the bar of any state? An expanded definition of "foreign" for the purposes of this rule would be helpful.

Carol Ann Armenti