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Sent: Friday, March 20, 2026 11:46 PM

To: LR Comments <LRComments@kingcounty.gov>; Michelle R. Ahrens <mahrens@mglaw.com>

Subject: comment on LCR changes draft

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Please find my comments on the proposed amendments to the Civil Rules. I hope these are helpful to the process of making these amendments. As you can see, I am making suggestions to further amend.

**Thank you,
Miryam Gordon**

LCR 7 5 (C) (i) makes a very big problem in requiring declarations include all attachments in one document. My understanding is that any INCLUDED attachment is automatically UNSEALED. Sealing is very important especially in family law cases and DV cases where pictures, health information, school records, etc. are needed for many reasons.

I suggest that there be a specific clarification process regarding Sealing that clarifies how and when a document can or should be sealed and how to associate that document with the declaration or other pleading that it should be included with. This remains a very badly written area of instruction at this point. To date, unless you have worked for a long time within the Efiling System, you don't even know that something might be filed UNSealed! Nor how to fix that when necessary.

LCR 11 - Limited License Legal Technicians should also clearly be included in this rulemaking.

LCR 70.1 - LLLTs do not "appear" formally, per our rule (APR 28). However the court should definitely know and add when LLLTs are representing clients in a case and should have similar data for them associated in the file. I am attaching a form I use to inform the court, signed by our client, as an example.

LFLR 6 is STILL DIFFERENT DEADLINES from LCR 7!!! WHY???

(d) Deadlines for Submitting Pleadings.

(1) Motions must be filed at least 14 calendar days before the hearing.

(2) Responses must be filed no later than **noon 5 judicial days** prior to the hearing. (3) Replies must be filed no later than **noon 3 judicial days** prior to the hearing.

Why can't LFLR 6 be the same as LCR 7 with 4:30 4 days and 4:30 2 days? OR change LCR 7 to 5 and 3?! It makes people crazy!

Similarly, WPSL deadlines ... (5) Submission List. The moving party must file a Working Papers Submission List by **noon 3 judicial days** before the hearing date. The non-moving party must file a Working Papers Submission List no later than **noon 5 judicial days** before the hearing date. Why can't these deadlines be aligned so we just have to remember One Rule?

LFLR 10 - some judges have been asking for credit reports, also. Could be considered for all?

LFLR 12 (e) (i) (A) Summary - develop a KC specific format for this? Guidance on what the summary should look like/include

LFLR 12 (f) Proposed Orders - may pro se petitioners email proposed orders to the bailiff for the assigned judge?

LFLR 12 (g) -- noting that timing here is Also 4/2! (g) Timing. Responsive materials must be filed no later than **noon 4 judicial days** prior to the hearing. Any reply must be filed no later than **noon 2 judicial days** prior to the hearing. Can these deadlines also be aligned???

Suggestion: Align LCR 7, LFLR 5 and LFLR 12 - either 5 day response by 4:30pm or 5 day response by noon, either 4 day response by 4:30pm or 4 day response by noon, either 3 day reply by 4:30 or 3 day reply by noon, either 2 day reply by 4:30 or 2 day reply by noon. Align WPSL deadline to that same timing.

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Limited License Legal Technicians (LLLTs) are licensed to advise and assist people going through divorce, child custody and other family-law matters in Washington. We may help petitioners in minor guardianships in default or agreed cases.

Also: APR 28 Regulation 2(B)(2)(g): LLLTs may present to a court agreed orders, uncontested orders, default orders, and accompanying documents.

The LLLT RPC Preamble says: A LLLT'S RESPONSIBILITIES

[1] A LLLT is authorized to provide limited legal services that lie within the scope of the practice that the LLLT is licensed to undertake. Within that scope, a LLLT is a member of the legal profession, is a representative of clients, and has a special responsibility for the quality of justice.

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