

**From:** Holderman, Paula Hudson [<mailto:PHolderm@winston.com>]  
**Sent:** Wednesday, April 27, 2016 10:41 AM  
**To:** ABA Issues Paper Comments  
**Cc:** Umberto Davi ([udavilaw@ameritech.net](mailto:udavilaw@ameritech.net)); [mdrumke@smbtrials.com](mailto:mdrumke@smbtrials.com)  
**Subject:** Commentary on the report from the ABA's Commission on the Future of Legal Services

Dear Commission Members:

Thank you for the opportunity to comment on the April 8 report regarding Alternative Business Structures. Speaking only on behalf of myself as a past state bar president and current ABA state delegate, I would oppose any ABA policy change on non-lawyer ownership of law firms or allowing an ABS.

I don't pretend that I can add any new insights to this discussion. I fully adopt the arguments expressed in Section 3 of the report. I would, however, make three points: 1) there was no burning need expressed in the report to make policy changes allowing forms of non-lawyer ownership; 2) there have been no significant developments, since the ABA Commission on Ethics 20/20 decided not to propose any policy changes on ABS, to consider the issue again; and 3) Goal I of the ABA is to serve its members and such changes would not.

I appreciate the time and effort the Commission has spent, but urge it not to propose any Resolutions allowing alternative business structures.

Best regards,

**Paula Hudson Holderman**

**Illinois State Delegate to the ABA House of Delegates  
Past-President, Illinois State Bar Association**

Winston & Strawn LLP  
35 W. Wacker Drive  
Chicago, IL 60601-9703

D: +1 (312) 558-5136

F: +1 (312) 558-5700

[Bio](#) | [VCard](#) | [Email](#) | [winston.com](http://winston.com)

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