

Dear Committee:

The outline seems to concentrate more on the practice of international firms, however, it should also cover concerns of lawyers practicing as foreign lawyers in foreign firms, as they also need help with ethics guidance on issues that are not faced by their big firm counterparts. A few of these concerns are:

1. how not having access to caselaw raises or lowers the accountability of a lawyer when their firm lacks resources;
2. how much of an effort should the lawyer make to inform their firm that they do not have the legal resources to properly complete a task;
3. how do differing ethical standards affect lawyers working in small foreign law firms;
4. how much advise can a lawyer give on the laws of a U.S. state that they are not barred in;
5. communication barriers when laws seem similar but are not;
6. ability to fully inform foreign clients of conflicts of laws issues or inform the clients of steps that could strengthen the clients position but lesson the bill, and
7. is a lawyer required to follow their ethical standards when the partner responsible for the case does not have to follow the same standards (for instance, the ability to use threats as a bargaining position).

Regards,

Vercell Fiffie