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7 **IN THE SUPREME COURT**
8 **STATE OF ARIZONA**

9 In the Matter of:

Supreme Court No. R-24-0030

10 **PETITION TO AMEND RULES**
11 **32(b) AND (c) OF THE ARIZONA**
12 **RULES OF SUPREME COURT**

STATE BAR OF ARIZONA
COMMENT

13 Pursuant to Rule 28(e) of the Arizona Rules of Supreme Court, the State Bar
14 of Arizona (the “State Bar”) hereby submits the following as its second comment to
15 the above-captioned Petition.

16 In January 2024, Petitioner filed a Petition proposing to amend Rules 32(b)
17 and (c), Ariz. R. Sup. Ct. The State Bar filed a Comment in opposition in April 2024.
18 After considering the Petition, the public comments, and the Reply during its August
19 2024 Rules Agenda, the Court issued an Order on August 22, 2024, proposing a
20 revision to Rule 32(c)(9), continuing consideration until it’s December 2024 Rules
21 Agenda, and opening an abbreviated public comment period on a proposed
22 amendment to Rule 32(c) only.
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25 The amended language proposed by this Court to Rule 32 would codify in

1 Rule 32(c)(9) that all activities conducted by the State Bar shall comply with *Keller*
2 *v. State Bar of California*, 496 U.S. 1 (1990). The State Bar supports the amended
3 language set forth in the Court's Order.
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5 RESPECTFULLY SUBMITTED this 1st day of October, 2024.

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8 Lisa M. Panahi
9 General Counsel

10 Electronic copy filed with the
11 Clerk of the Supreme Court of Arizona
12 this 1st day of October, 2024.

13 by: PSeguin
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