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**IN THE SUPREME COURT
STATE OF ARIZONA**

In the Matter of)	Supreme Court No. R-25-0008
)	
PETITION TO)	COMMENTS OF THE ARIZONA
)	COMMISSION ON ACCESS TO
ADOPT RULE 13.2, ARIZONA)	JUSTICE
RULES OF CIVIL APPELLATE)	
PROCEDURE)	
)	
ADOPT RULE 31.10(a), ARIZONA)	
RULES OF CRIMINAL)	
PROCEDURE,)	
)	
AND)	
)	
AMEND RULE 607, ARIZONA)	
RULES OF PROCEDURE FOR THE)	
JUVENILE COURT)	
)	
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)	

The Arizona Commission on Access to Justice is charged with considering and recommending innovative ways to promote access to justice for individuals who cannot afford legal counsel or who choose to represent themselves in civil cases. Established in 2014, the Commission evaluates best practices, identifies possible

changes in court rules or practices to reduce barriers to access, identifies and encourages the adoption of best practices among legal service providers, and considers potential long-term funding options.

Following a presentation at the April 10, 2025, Commission meeting, a motion was made and seconded that the Commission provide a comment on Rule Change Petition No. R-25-0008, but remain neutral as to its adoption. After discussion by members of the Commission, that motion passed. This Comment is a result of that formal Commission action and reflects the Commission's neutral position, with these comments, on the changes requested in the Petition.

This Petition seeks to add a new rule to the Arizona Rules of Civil Appellate Procedure, the Arizona Rules of Criminal Procedure and a new subsection to Arizona Rule of Procedure for the Juvenile Court 607. Each of these additions would allow self-represented parties to file "informal" briefs. Conceptually, this seems like a good idea, but there is concern that this "informal" process poses potential risk from parties abusing an easier process through increased baseless litigation and claims against other unrepresented litigants. Additionally, it is recommended that any use of forms be standardized across the courts in this state, otherwise, an easier process may create confusion and infringe on access to justice issues.

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The Commission appreciates the consideration of these comments as the proposed amendments requested in Petition No. R-25-0008 are reviewed.

DATED this 30th day of April 2025.

_____/s/_____
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