

**Public Comments Regarding Proposed Amendments to Iowa Court Rule
31.16—Registration of House Counsel (due July 31, 2020)**

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	(received)
Nyemaster, Goode	6-26-2020
Chris Littlefield on behalf of various major corporate law departments	7-29-2020

June 23, 2020

FILED

JUN 26 2020

Clerk of the Iowa Supreme Court
1111 East Court Avenue
Des Moines, IA 50319

CLERK SUPREME COURT

Re: Amendments to Iowa Court Rule 31.16 – Registration of House Counsel

Dear Chief Justice Christensen:

Pursuant to the Court's Order dated June 2, 2020 requesting public comment on the Proposed Amendments to Iowa Court Rule 31.16 – Registration, we write to express Nyemaster Goode's support for the proposed rule amendments.

Specifically, amendment to Rule 31.16(9)(10), lines 16-28 (page 2 of 3) to remove the 5-year limitation on house counsel registration status for attorneys licensed in another jurisdiction will serve to bring Iowa in conformity with how other jurisdictions treat house counsel registration and facilitate the significant business sector in Iowa employing house counsel.

The amendment to Rule 31.16(3)(c)(1), lines 11-17 (page 1 of 3), will also serve to bring Iowa in conformity with how other jurisdictions treat house counsel registrants and allow house counsel to support the important work of the Office of Professional Responsibility.

Thank you for the Court's ongoing review and revision of the Rules relating to Admission to the Bar.

Very truly yours,



Angel A. West



Frank B. Harty

FILED

JUL 29 2020

CLERK SUPREME COURT



[EXTERNAL] House Counsel

Littlefield, Chris to: rules.comments@iowacourts.gov

07/29/2020 04:58 PM

1 attachment



2020 07 01 - Letter in Support of Changes to Rule 31.16 - Corporate - Rogers and Littlefield.docx

Please see attached comment letter on proposed changes to Rule 31.16 – Registration of House Counsel. This comment letter is submitted on behalf of the law departments of Principal Financial Group, Deere & Co., Vermeer Corporation, Transamerica Life Insurance Company and Aegon Asset Management.

Chris Littlefield

EVP & General Counsel

Principal Financial Group

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JUL 29 2020

CLERK SUPREME COURT

DELIVERED VIA EMAIL

July 29, 2020

Clerk of the Iowa Supreme Court
1111 East Court Avenue
Des Moines, IA 50319

Re: Amendments to Iowa Court Rule 31.16 – Registration of House Counsel

Dear Chief Justice Christensen:

As requested by the Iowa Supreme Court's Order dated June 2, 2020, which solicits public comment on the Proposed Amendments to Iowa Court Rule 31.16 – Registration, we write to express our strong support for the proposed Rule amendments. Because we employ a significant number of house counsel at our respective companies, these proposed amendments are important for us and the attorneys who play such a crucial role in our businesses.

Specifically, the amendment to Rule 31.16(9)(10), lines 16-28 (page 2 of 3), which addresses removal of the 5-year limitation on house counsel registration status for attorneys licensed in another jurisdiction, will (1) serve to bring Iowa into conformity with how other jurisdictions treat house counsel registration, (2) simplify and expedite employment of in-house counsel at Iowa businesses, and (3) allow domestic lawyers to benefit from the same unlimited duration on their registration as foreign lawyers have received. And, the amendment to Rule 31.16(10)(11), lines 1-8 (page 3 of 3), which would remove the 5-year limitation on the duration of house counsel status for attorneys currently subject to that limitation, further facilitates the intent of the amendment to Rule 31.16(10), making it easier for our attorneys to maintain their house counsel status.

We appreciate this Court's ongoing attention to and revision of the Rules relating to Iowa Bar Admission, which both contributes to the strength of our local Bar and facilitates our ability to attract and retain our legal talent.

Submitted on behalf of the law departments of the companies listed below,

Principal Financial Group

Deere & Co.

Vermeer Corporation

Transamerica Life Insurance Company

Aegon Asset Management