

From: bmagill@magillrumsey.com
To: [ADMcomment](#)
Subject: ADM File # 2019-32 COMMENTS
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3 comments

1. Do we really need anything more than the Rules of Professional Conduct
2. #10 of the general "Professionalism Principles uses the vague and subjective word "just" ---I suggest that if you adopt these, that word be removed and replaced with the usual standard: "only those positions which can be supported by the facts and law."
3. The 3rd bullet point of the principles for lawyers should end at the word "settlement" and the remainder should be re-written to read something like this: "But such discussions should not be used in bad faith by either counsel as a means to improperly adjourn discovery or delay trial." Adjourning discovery and moving trial dates often go hand-in-hand with legitimate settlement efforts.

Thanks for your consideration,

Bob Magill, Jr. P16970

Magill and Rumsey, P.C.
455 E. Eisenhower Pkwy, Suite 355
Ann Arbor, MI 48108
734-995-2500
734-995-4798 (fax)
bmagill@magillrumsey.com
www.magillrumsey.com