

PRO BONO LEGAL SERVICES GUIDELINES

_____ (the “Firm”) is committed to providing pro bono legal services nationally and to the communities in which it practices. We believe our lawyers have an ethical obligation to provide pro bono legal services, that clients receiving such pro bono services are entitled to the same level of professional service that we provide to other clients of the Firm, and that the provision of pro bono legal services will improve the education and community standing of both the lawyers who provide those services and the Firm as a whole.

The Firm’s Pro Bono Legal Services Goals can be summarized as follows:

- To fulfill pro bono obligations of the Firm and its lawyers;
- To provide quality training opportunities for the Firm’s lawyers through the pro bono activities the Firm encourages;
- To assist the Firm in its efforts to attract ethically and socially responsible persons to its ranks through the pro bono activities it encourages;
- To obtain recognition for the Firm among its clients, prospective clients, and the community at large; and
- To enhance the morale of all employees of the Firm through providing a source of pride in the contributions and accomplishments of the Firm’s pro bono activities.

The following policies will govern pro bono activities by the Firm’s lawyers:

1. A Firm Pro Bono Committee, comprised of the Firm-Wide Pro Bono Partner, _____, and one partner and one alternate from each office (the “Pro Bono Partner” and “Pro Bono Partner Alternate”), will direct the Firm’s pro bono activities, in concert with Firm management, to realize the Firm’s Pro Bono Legal Services Goals.
2. Pro Bono Legal Services will include all uncompensated legal services that are: (a) rendered directly to poor persons in civil matters or in criminal matters or related to simplifying the legal process for, or increasing the availability and quality of legal services to, poor persons; (b) rendered to charitable, public interest organizations with respect to matters or projects designed predominately to address the needs of poor persons, (c) rendered to individuals, groups, or organizations seeking to secure or protect civil rights, civil liberties or public rights, (d) rendered to charitable, religious, civic, community, governmental or educational organizations in matters in furtherance of their organizational purposes, where the payment of standard legal fees would significantly deplete the organization’s economic resources or would be otherwise inappropriate, or (e) involve societal issues, such as pre-approved special projects or cases involving significant legal issues such a death penalty case or cases assigned to attorneys by the Court, for which they receive no fee or a nominal fee (such as prisoner civil rights cases).
3. Service as a judge pro tem, court-appointed arbitrator, community mediator or similar activity as a neutral constitutes Pro Bono Legal Services if: (a) there is no compensation for the service and (b) at least one of the parties involved in the dispute resolution process is low-income.

4. Pro Bono Legal Services do not include: (a) legal services rendered to charitable, public interest organizations with respect to matters or projects that are not designed predominately to address the needs of poor persons and/or the public interest, or (b) non-legal board service on the boards of public interest legal services organizations, or any volunteer or public service work of a non-legal nature. While the Firm encourages its attorneys and paralegals to volunteer in their communities, this type of non-legal work would not entitle them to billable credit, as discussed in paragraph 15 below. In addition, proposed engagements whose primary object is to further goals other than community service (e.g., purely marketing efforts, legal work for friends or family), while worthy, do not constitute Pro Bono Legal Services.
5. When deciding whether a not-for-profit entity is able to pay standard legal fees without significantly depleting its economic resources, in order to qualify as pro bono under paragraph 2(d) above, the Firm will consider: (i) the organization's history of payment of legal fees to the Firm or to other legal counsel, (ii) the payment by the organization of professional fees to non-legal service providers for the same or similar matters, (iii) the organization's budget relative to other organizations in its market considered potential pro bono clients, and (iv) the payment of customary legal fees by organizations of similar size and purpose. The size of an organization's budget may be relevant to this analysis, but not necessarily dispositive, as public interest organizations with relatively large budgets often do not customarily pay for legal counsel as such payments would compromise their missions.
6. The Firm Pro Bono Committee will coordinate pro bono efforts through the pro bono activities of approved bar associations, legal aid societies, legal public interest agencies or similar non-profit organizations. The Pro Bono Committee shall consider the following attributes, among other relevant factors, in selecting such approved organizations:
 - (A) The organization should have effective client screening methods;
 - (B) The organization should provide training for Firm personnel, where necessary, on topics relevant to the representation;
 - (C) The organization should provide adequate support to Firm personnel conducting pro bono representation;
 - (D) The organization should offer adequate professional liability insurance coverage for Firm pro bono efforts; and
 - (E) The organization should provide opportunities for recognition of the Firm's contributions through publications, awards, community events or the like.
7. Pro bono matters not emanating from organizations offering the resources described above will be considered on a case-by-case basis.
8. If a court requests that an attorney handle a court-appointed case, that attorney should discuss the case with the Pro Bono Partner in his/her office. Such court-appointed cases should only be declined after careful consideration and consultation by the Pro Bono Partner with the attorney's practice group and/or team leader.

9. All proposed pro bono engagements are subject to Pro Bono Partner approval. The attorney proposing a new engagement must request that a conflicts search be run and complete a Pro Bono Screening Application for submission to the Pro Bono Partner in the NP office where the matter is to be opened. The scope of the engagement (including anticipated time commitment) must be described in sufficient detail on the Pro Bono Screening Application and the requested resources identified specifically, so that the Pro Bono Partner may make an informed decision as to the suitability of assuming the representation.
10. All proposed pro bono engagements are also subject to New Business Review and PGL approval, just like all other engagements. If approved by the Pro Bono Partner of the NP office where the matter is to be opened, the prospective matters are sent for final review through the Firm's standard new business review procedure ("New Business Review") and by the PGL(s) of the attorney(s) who will be performing the pro bono work. Factors New Business Review and PGL(s) will consider in determining whether to accept these engagements include conflicts clearance, staffing and resources, and compatibility of the proposed project with the Firm's areas of expertise and other goals.
11. All proposed pro bono clients are subject to the same criteria, other than payment arrangements, as any other Firm clients. All proposed pro bono matters must be opened under a pro bono billing number. Any engagement in which substantial costs may be incurred or indicated must be approved in advance by a Pro Bono Partner in his/her office. See paragraph 14 below.
12. Once approved, engagements will be overseen locally by the Pro Bono Partner located in the particular office in which the work is being performed. The Pro Bono Partner will oversee the engagement, primarily monitoring its scope and assigned resources as it progresses. In addition, if the engagement is being handled by one or more associates, a responsible supervising partner will be assigned to provide (or to assure that there is) appropriate supervision to the associate(s) during the course of the representation, if the Pro Bono Partner feels it is necessary and appropriate.
13. When an attorney accepts a pro bono engagement, that attorney must comply with all Firm procedures with regard to client representation, including sending an engagement letter, opening a formal file, docketing entries so that court and other dates are not missed, sending a closing letter, and generally representing the pro bono client zealously in accordance with our ethical and professional obligations.
14. The Firm will reimburse for routine costs associated with the pro bono engagement, such as photocopying, telephone calls, facsimiles and un-waivable filing fees, up to \$500. Any routine costs in excess of \$500, and any non-routine costs (such as expert witness fees, translator fees and out-of-state travel), must be pre-approved by the Pro Bono Partner of the NP office where the matter is to be opened. If there are significant costs involved in a pro bono matter, such as expert witness or translator fees, the attorney shall make every effort to obtain those services for free, or to get someone else (either the Court or the sponsoring organization) to cover the expense.
15. The Firm recognizes that the American Bar Association urges attorneys to render at least 50 hours of pro bono legal services per year. The Firm will credit pro bono legal work towards annual billable hour requirements for attorneys and paralegals and towards the

hour-based threshold for their bonus awards. As soon as the attorney or paralegal becomes aware that the number of hours that he/she has spent on pro bono legal work will likely exceed 50 hours for the current year, he/she should notify the supervising partner for the pro bono project(s) and the Pro Bono Partner in his/her office, who will review the pro bono project(s) at issue and make sure they are appropriately staffed.

16. When an attorney handling a pro bono case leaves the Firm, he or she should notify the Pro Bono Partner of his or her departure and work with the Pro Bono Partner to either: (i) locate another Firm attorney to take over the representation of the pro bono client, (ii) return the case back to the organization from which it came for reassignment, or (iii) take the case with him or her, in which case the attorney must notify the pro bono client in writing that the Firm is withdrawing from representation in the matter.