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Inside

A publication of the Corporate Counsel Section
of the New York State Bar Association

Message from the Chair

To the Members of the Corporate Counsel Section:

I hope you have enjoyed a pleasant summer. As Chairperson of the Section's Executive Committee, I would like to share with you some of the recent activities the Section has been engaged in, as well as some upcoming events.

On October 29th, the Section will offer its annual ***Ethics for Corporate Counsel*** program in New York City. The program will consist of a panel of well-known experts in the area of ethics. Using hypothetical examples, they will discuss problems that have specific applicability to in-house practitioners. This is an excellent opportunity to earn four CLE credits in Ethics and to meet and socialize with your counterparts from a wide spectrum of in-house law departments. Registration forms will be mailed to all members in early autumn, and I encourage you to join us that day.

Recently the Section completed an extensive survey of its membership, which will serve as a jumping-off point for our development in the years ahead. As we work to understand how we can best serve our members, the Section's Executive Committee will focus on opportunities for Section growth in ways that reflect the wonderfully diverse community of in-house counsel that exists in New York State. We welcome all suggestions—please feel free to contact me at Barbara.Levi@unilever.com, or you may also contact the Section's membership chair, Mitch Borger, at mborger@fds.com.

This issue of ***Inside*** reflects the many areas of our members' interests. Included is an announcement of the CLE program which the NYSBA will present on October 22nd, entitled "Advice From More Experts: More Successful Strategies for Winning Commercials Cases in Federal Courts." The program, which will be chaired by Robert L. Haig of Kelley, Drye & Warren, will be helpful to both litigators and non-litigators alike and will utilize an interactive format to educate and offer practical advice for maximizing the effectiveness of each stage of commercial litigation.

Also included in this issue is an excellent analysis by Gregory I. Rasin and Miriam Lieberson of Jackson Lewis LLP of recent Supreme Court rulings in the area of constructive discharge claims, entitled "Supreme Court's Decision to Allow the *Faragher/Ellerth* Affirmative Defense in Certain 'Constructive Discharge' Claims Carries Mixed Message for Employment Litigants."

I am especially pleased to draw your attention to the article submitted by one of the Section's newest members, Erica R. Jacobson, who is in-house counsel for a New York area company in the securities industry. Erica explains the recently enacted New Jersey licensing

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rules that impact New York lawyers who work in-house in their employers' New Jersey offices.

I encourage each of you to take the initiative, as Erica did, and submit articles for publication in ***Inside*** that you believe would be of interest to members of the Section. Bonni G. Davis, Executive Committee member and Editor of ***Inside***, can be contacted at bdavis@fnly.com and she would welcome articles from you or your outside counsel.

Looking ahead to 2005, I urge you to mark your calendars now to hold these dates—September 22nd and 23rd—so that you can attend the first NYSBA "Corporate Counsel Institute." A day and a half of CLE programs and break-out sessions specifically geared to the interests and concerns of in-house counsel will take place at the Princeton Club in New York City. Please visit the NYSBA website at http://www.nysba.org/corporate and click on upcoming events in the months to come to view updates on this exciting program.

I hope you enjoy this issue of ***Inside***, and I very much look forward to meeting you at our upcoming Section events.

Barbara M. Levi

State Bar to Present CLE Program on Commercial Litigation

Editor's Note: Although this program is not sponsored by the Corporate Counsel Section as such, Section leaders believe it may be of interest to many of our members and bring you this announcement as a public service to our members.

The New York State Bar Association will present a CLE program on Friday, October 22, 2004. The title of the program is "Advice From More Experts: More Successful Strategies for Winning Commercial Cases in Federal Courts."

This program is the 2004 version of the highly successful CLE program on commercial litigation in federal courts that the New York State Bar Association presented on October 24, 2003. At this year's program, an extraordinary panel of seven distinguished federal judges, 21 well-known commercial litigators, and six prominent in-house counsels for major corporations will offer practical advice and strategies for winning business and commercial cases in federal courts. The program will begin with discussion of the strategic issues involved in forum selection, removal, and transfer as well as in preliminary injunctions and temporary restraining orders. The next topics will be the effective handling of motions to dismiss and for summary judgment, and class actions. The program includes discussion of discovery of electronic records and of deposition techniques. Also covered will be mediation and arbitration, and attorney-client and work-product privileges. Trial advocacy and the use of expert testimony will be discussed in detail. The program covers appellate advocacy and settlement strategies, and concludes with insights into the client's perspective of business litigation.

This program will employ an exciting, interactive format. The speakers will focus on strategies and practical advice for maximizing the effectiveness of each stage of the litigation. In particular, they will discuss techniques for advancing a client's interests as well as potential pitfalls or traps for the unwary.

The program chair is Robert L. Haig of Kelley Drye & Warren LLP in New York City. The speakers include United States District Judges Naomi Reice Buchwald, Miriam Goldman Cedarbaum, Denny Chin, Denise L. Cote, Victor Marrero, Colleen McMahon, and Shira A. Scheindlin. Other speakers are the following leading litigators: Robert M. Abrahams, Jeffrey Barist, James N. Benedict, David M. Brodsky, John M. Callagy, Evan A. Davis, Jeremy G. Epstein, Bruce E. Fader, William P. Frank, Robert D. Joffe, David Klingsberg, Harvey Kurzweil, Gregory A. Markel, William G. McGuinness, Richard L. Posen, James W. Quinn, Jay G. Safer, Herbert M. Wachtell, John L. Warden, Melvyn I. Weiss, and Robert F. Wise, Jr. Also speaking will be the following prominent in-house counsel for major corporations: Chester Paul Beach, Jr., Associate General Counsel, United Technologies Corporation; Hannah Berkowitz, General Counsel-Litigation and Senior Vice President, UBS Financial Services Inc.; Lawrence J. Hurley, Corporate Counsel, Lucent Technologies, Inc.; Stephanie A. Middleton, Chief Counsel, Litigation and Human Resources Law, CIGNA Companies; Mark E. Segall, Senior Vice President and Associate General Counsel, J.P. Morgan Chase & Co.; and Richard H. Walker, Managing Director and Global General Counsel, Deutsche Bank AG.

This program is designed for both newly admitted attorneys seeking an overview of business and commercial litigation in federal courts and experienced attorneys seeking to refine and update their litigation skills. The program will take place from 9:00 a.m. to 4:30 p.m. on Friday, October 22, 2004 in the Jury Assembly Room of the United States Courthouse at 500 Pearl Street in downtown Manhattan. Attendees will receive 7.0 MCLE credits. In addition to the New York State Bar Association, the American Bar Association's Section of Litigation is co-sponsoring the program. The program fee will be $290 for NYSBA and ABA Section of Litigation members and $345 for non-members. For reservations, call (800) 582-2452 or go to www.nysba.org/advice.

All registrants for the program will receive included in the price of their registration a copy of the critically acclaimed six-volume treatise *Business and Commercial Litigation in Federal Courts.* This publication was written by 152 outstanding attorneys and federal judges throughout the United States and provides valuable information and tips on how to handle all stages of commercial cases—from initial assessment, through pleadings, discovery, motions, trial, and appeal. Great emphasis is placed on strategic considerations specific to commercial cases. Sample forms are provided as well as procedural checklists. In addition, there is comprehensive coverage of 28 areas of substantive law, including strategy, checklists, forms and jury charges. Also covered are compensatory and punitive damages and other remedies.

Supreme Court's Decision to Allow the *Faragher/Ellerth* Affirmative Defense in Certain "Constructive Discharge" Claims Carries Mixed Message for Employment Litigants

By Gregory I. Rasin and Miriam Lieberson

In a ruling clarifying the scope of two 1998 workplace sexual harassment decisions, *Burlington Industries, Inc. v. Ellerth*, 524 U.S. 724 (1998), and *Faragher v. City of Boca Raton*, 524 U.S. 775 (1998), the U.S. Supreme Court recognized for the first time the concept of "constructive discharge" as a basis for employer liability under Title VII of the Civil Rights Act of 1964. However, in the case decided June 14, 2004, *Pennsylvania State Police v. Suders*, 542 U.S. __, docket no. 03-95, the Court found that constructive discharge is not necessarily an "adverse action" that would preclude an employer from asserting the affirmative defense made available in the dual decisions on sexual harassment. (The full text of the *Suders* decision is available on the U.S. Supreme Court's website, www.supremecourtus.gov/opinions.)

Briefly summarized, in the *Suders* case, the U.S. Supreme Court found:

- Title VII encompasses employer liability for a constructive discharge. (The Supreme Court had not previously recognized constructive discharge as a viable claim under Title VII, although lower courts had.)
- To establish "constructive discharge" in a supervisor hostile environment claim, the plaintiff must prove that she was the victim of a hostile work environment and that "the abusive working environment became so intolerable that her resignation qualified as a fitting response."
- The employer may avoid liability if it can prove "(1) that it had installed a readily accessible and effective policy for reporting and resolving complaints of sexual harassment, and (2) that the plaintiff unreasonably failed to avail herself of that employer-provided preventive or remedial apparatus."
- A plaintiff may avoid the affirmative defense to a claim of constructive discharge if she can show that she quit "in reasonable response to an employer-sanctioned adverse action officially changing her employment status or situation, for example, a humiliating demotion, extreme cut in pay, or transfer to a position in which she would face unbearable working conditions."

The Facts of the Case

The plaintiff-respondent Nancy Drew Suders alleged sexually harassing conduct by her supervisors, officers of the Pennsylvania State Police (PSP), of such severity that she was forced to resign. Suders commenced work for the PSP in March 1998. Suders alleged that her male supervisors subjected her to repeated offensive sexual comments and gestures during the course of her employment.

In June 1998, after an incident where Suders was accused of taking a missing accident file home with her, Suders approached an equal employment opportunity officer and told her she "might need some help." The officer gave Suders her telephone number, but neither woman followed up on the conversation. Two months later, in August 1998, Suders contacted the EEO officer again. Suders told the officer that she was being harassed and was afraid. The officer told Suders to file a complaint, but did not tell her how to obtain the necessary form. Suders felt that the officer's response was insensitive and unhelpful.

Two days later, Suders' supervisors arrested her for theft and she resigned from the PSP. The arrest was for the alleged theft of exams which Suders had taken to satisfy a PSP job requirement. Her supervisors had told her she had failed the exams; however, she subsequently discovered her exams in a set of drawers in the women's locker room. Concluding the exams had never been graded, Suders considered the tests her property and hers to take.

Once the supervisors discovered that the tests were missing, they dusted the drawer with a theft-detection powder that turns hands blue when touched. When Suders attempted to return the tests, her hands turned blue. The supervisors apprehended her, handcuffed her, photographed her, and read her the Miranda rights warning in an interrogation room. After this incident, Suders resigned, although she was never charged with a crime.

Procedural History of the Litigation

In September 2000, Suders sued the PSP in U.S. District Court for the Middle District of Pennsylvania, alleging, *inter alia*, that she was subjected to sexual

harassment and constructively discharged in violation of Title VII. The District Court granted the state's motion for summary judgment, finding that although Suders established an actionable hostile environment, the employer effectively defended itself by asserting the *Ellerth/Faragher* defense and showing that Suders never gave the employer the chance to respond to her complaints. The District Court did not address Suders' constructive discharge claim.

The U.S. Court of Appeals for the Third Circuit reversed and remanded the case, *Suders v. Easton, et al.*, (No. 01-3512, April 16, 2003). The appeals court found that Suders had presented evidence sufficient for a trier of fact to conclude that supervisors had engaged in a pervasive pattern of sexual harassment. It also held that "genuine issues of material fact existed concerning the effectiveness of the PSP's 'program . . . to address sexual harassment claims.'" It further held that a constructive discharge, when proved, constitutes a tangible job action that precludes the employer from asserting the *Ellerth/Faragher* defense.

The Supreme Court's Opinion

The Supreme Court granted certiorari to resolve the disagreement among the federal courts of appeals on "the question whether a constructive discharge brought about by supervisor harassment ranks as a tangible employment action and therefore precludes assertion of the affirmative defenses articulated in *Ellerth* and *Faragher*." Justice Ruth Bader Ginsburg wrote the opinion for the Court's eight-member majority. Justice Clarence Thomas dissented.

Justice Ginsburg noted that the U.S. Supreme Court had not previously recognized that a constructive discharge claim could give rise to Title VII liability, even though the U.S. Courts of Appeals have long recognized constructive discharge claims in a wide range of Title VII cases. The Court stated that it "agree[s] with the lower courts and the EEOC that Title VII encompasses employer liability for a constructive discharge." To establish constructive discharge, the plaintiff would have to show "that the abusive working environment became so intolerable that her resignation qualified as a fitting response."

This case, Justice Ginsburg said, involves a "subset" of Title VII constructive discharge claims: constructive discharge attributable to a hostile working environment caused by a supervisor. Absent a "tangible employment action," she concluded, the *Ellerth/Faragher* defense is available to an employer whose supervisors are charged with harassment that leads to a resignation.

In *Faragher* and *Ellerth,* the Supreme Court had looked to agency principles to decide that the employer can be liable for harassing acts of the supervisor when the supervisor is aided in accomplishing the acts by the existence of the employment relationship.

Justice Ginsburg reasoned that constructive discharge claims are unique because "harassment so intolerable as to cause a resignation may be effected through co-worker conduct, unofficial supervisory conduct, or official company actions. Unlike actual termination, which is always effected though an official act of the company, a constructive discharge need not be." Moreover, unless an official act of the employer is "the last straw, the employer would have no particular reason to suspect that a resignation is not the typical kind daily occurring in the work force."

An official act reflected in company records, i.e., a demotion or pay reduction, shows "beyond question" that the supervisor used his or her management position to the employee's disadvantage, Justice Ginsburg continued. "Absent such an official act, the extent to which the supervisor's misconduct has been aided by the agency relation . . . is less certain. That uncertainty, our precedent establishes, justifies affording the employer the chance to establish, through the *Ellerth/Faragher* affirmative defense, that it should not be held vicariously liable."

The Third Circuit erred, said the Supreme Court, when it created a bright-line test holding that the affirmative defense would be eliminated in all hostile-environment constructive discharge cases, but retained in ordinary hostile-environment claims. "That placement of the line, anomalously, would make the graver claim of hostile-environment constructive discharge easier to prove than its lesser included component, hostile work environment," Justice Ginsburg wrote.

In Justice Thomas's dissent he criticized the way the Court defined "constructive discharge." He noted that for the purposes of Title VII litigation, courts generally require a showing that the employer deliberately rendered the employee's working conditions intolerable, thus forcing the employee to quit. However, he continued, the majority does away with the intent requirement.

Justice Thomas argued that the majority ruling would hold an employer liable under Title VII for constructive discharge brought about by a hostile work environment created by a supervisor, even if there was no adverse job action. It makes no sense to view a constructive discharge as equivalent to an actual discharge under these circumstances, Justice Thomas argued, and the employer should be liable only if the plaintiff proves the employer was negligent in permitting the supervisor's conduct to occur. Since plaintiff Suders did not show any adverse job action was taken because of her sex, or that the employer knew or should have known

of the alleged harassment, Justice Thomas concluded the case should be dismissed.

Future Employment Litigation Considerations

The Supreme Court's ruling in the *Suders* case contains both good and bad news for employers defending allegations of sexual harassment. The good news is that an employer maintains the right to assert the affirmative defense in matters where the plaintiff is asserting constructive discharge. Employers, therefore, should continue to promulgate anti-harassment policies and encourage reporting of complaints and prompt investigation.

The bad news is that without a bright-line test, there is uncertainty and, therefore, more litigation. Specifically, it is unclear what could constitute an "official action." Presumably, it is less than an "adverse job action," and while Justice Ginsburg contemplated it would be an action documented in company records, there is no other guidance. For example, the Court did not decide whether Suders herself was subject to "official action." Justice Ginsburg merely noted in a footnote that "[a]lthough most of the discriminatory behavior Suders alleged involved unofficial conduct, the events surrounding her computer-skills exams . . . were less obviously unofficial."

The other potentially negative aspect of this case, as noted by Justice Thomas in his dissent, is the apparent elimination of the intent requirement to prove constructive discharge. Although Justice Ginsburg limited her opinion to a "subset" of constructive discharge claims, i.e., those arising from a supervisor hostile work environment, plaintiffs' attorneys will probably attempt to argue that the intent requirement is no longer necessary for any constructive discharge claim.

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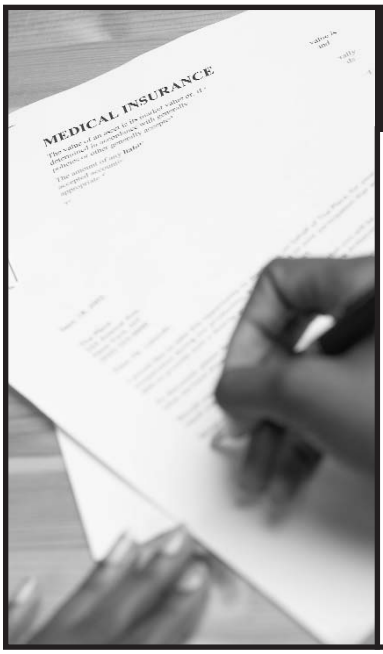

Request for Articles

If you have written an article, or have an idea for one, please contact *Inside* Editor:

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Articles should be submitted on a 3½" floppy disk, preferably in Microsoft Word or WordPerfect, along with a printed original and biographical information.

New Jersey Bar Processing New In-House Counsel Applications of Many New York Attorneys Working Across the Hudson

By Erica R. Jacobson

New Jersey's new in-house counsel licensing rule is impacting New York barred attorneys who work in their employers' offices located outside New York. The New Jersey Bar is still processing the 1,191 applications received since March from in-house counsel working either full-time or periodically in New Jersey.

Background

Beginning in 2004, the Supreme Court of New Jersey requires in-house counsel working full-time or periodically in New Jersey to apply for a limited license to practice law in New Jersey—despite existing admission to the bar of another state—as a safe harbor from the unauthorized practice of law. The license permits the attorney to perform legal work and representation for his or her employer, but no other clients. Applicants are not required to take the New Jersey bar exam or to retake the Multistate Professional Responsibility Examination ("MPRE").

New Jersey is joining the current trend, along with about 25% of other states, to end the long-standing tolerance to allow non-local attorneys to function as in-house counsel without local bar admission. For years, Manhattan-based companies have been free to station in-house counsel on either side of the Hudson and throughout the country. Following September 11th, Jersey City became a prime location for office space. The New Jersey in-house counsel rule also impacts companies in the Philadelphia/Camden area whose attorneys are licensed in Pennsylvania.

According to New Jersey Bar spokesperson Tammy Kendig, most of the applications were received from attorneys licensed in New Jersey's neighboring states. Before the deadline, she says, the Bar tried to think of as many outlets as they could to publicize the new rule, including business publications and New Jersey Bar notices, but there was no way to identify each in-house attorney working in New Jersey who was licensed elsewhere.

The Rule

Rule 1:27-2(a) defines "In-House Counsel" as "a lawyer who is employed in New Jersey for a corporation, a partnership, association, or other legal entity (taken together with its respective parents, subsidiaries, and affiliates) authorized to transact business in [New Jersey] that is not itself engaged in the practice of law or the rendering of legal services outside such organization, whether for a fee or otherwise, and does not charge or collect a fee for the representation or advice other than to entities comprising such organization."

Beyond the text of the rule, the New Jersey Board of Bar Examiners has provided additional guidance for compliance. It published its Supplemental Administrative Determinations on March 1, 2004, and it occasionally updates its website-posted FAQs. Highlights from both include:

- **Substantial Contacts with New Jersey**: In-house counsel who do not work 100% of the time in New Jersey still must apply if they handle New Jersey matters or have substantial contacts with the New Jersey entity. This includes "regularly spending several weeks out of the year in New Jersey" but not counsel "located in another jurisdiction [who] has only occasional and irregular contact with the New Jersey office." The Court refers the reader to the Multijurisdictional Practice Rule of Professional Responsibility (RPC 5.5(b)) for further guidance.
- **Non-Attorney Positions**: Attorneys working as paralegals or in non-legal positions (regardless of titles) are exempt.
- **Patent Attorneys**: Federally licensed patent attorneys not otherwise practicing are exempt from the in-house license rule.
- **"Temporary" and Part-Time Employees**: Temporary (full- or part-time) and part-time attorneys hired in-house through a staffing agency are not eligible for the in-house license. Instead, these attorneys are to apply for a plenary license. Attorneys already hired without a plenary license have until January 1, 2005 to comply.
- **Attorneys Not Admitted in the U.S.**: Although the rule requires applicants to be in good standing in at least one other U.S. jurisdiction, foreign attorneys in good standing abroad who are already employed in-house prior to January 1, 2004 are grandfathered for this requirement.

- **New Employees**: Newly hired in-house counsel have 60 days to file the application.
- **Changed Employment**: Applicants who change employment have 90 days to secure new in-house employment. Otherwise, they must re-apply later with the new employer.
- **Pro hac vice**: In-house counsel licensees still must apply for pro hac vice admission to litigate before a New Jersey court or administrative agency.
- **Pro bono**: In-house counsel licensees are not required to participate in pro bono work in New Jersey. Voluntary pro bono work may be arranged through Legal Services of New Jersey, Inc.
- **Skills & Methods Course**: Unlike plenary-licensed attorneys, in-house counsel licensees do not have to take the Skills and Methods Course. Instead, the Court has directed the Commission on Professionalism and the Institute for Continuing Legal Education to develop a special course for in-house counsel. Applicants must take the course within one year of it first being offered or one year of licensure, whichever occurs first.
- **Bar Fees**: In-house counsel licensees are to pay the same annual assessments to the New Jersey Lawyers' Fund for Client Protection as their plenary-licensed peers (in addition to the fees required by the other state(s) to which they are admitted and upon which the New Jersey Limited License relies).

Application Requirements, Fees and Fingerprinting

The expense of compliance with the new rule is not insignificant for in-house counsel applicants. Multiple fees are required to complete and submit the application. Each application requires a $750 company-issued check (no personal checks), plus a $150 late fee for applications submitted after the March 31, 2004 deadline (except for newly hired in-house counsel). To support the application's extensive questionnaire, official documents are required, many of which require nominal fees to obtain, such as driver's records, and Certificates of Good Standing and disciplinary records from courts and bars where the attorney was ever admitted.

However, the requirement that makes New Jersey's application famously onerous, compared to other states, is the mandatory fingerprinting for a criminal record check. The issue, beyond the added $68 processing fee and limited hours of operation with no Sunday hours posted, is that none of the fingerprinting locations is conveniently reachable by public transportation from Manhattan.

The New Jersey Bar has appointed a single vendor, Sagem Morpho, Inc. (http://www.bioapplicant.com/nj/) which has fingerprinting facilities located at one DMV in Eatontown, three psychiatric hospitals (in Woodbine, Glen Gardner, and Hammonton), and 13 office locations. According to the vendor's website, the closest option for those limited to Manhattan public transportation involves taking the PATH train or a bus from New York Penn Station to Newark Penn Station, taking the #62 bus to Elizabeth, switching to the #57 bus to South Wood Avenue, and finally walking 10 minutes to Winsor's Tractor Trailer Driving School in Linden, New Jersey.

"In the past few years, about half the states in the U.S. have updated their in-house counsel rules, and other states' rules are currently under review."

Applicants unable to reach these locations during the hours posted (because, for example, they live out-of-state, or perhaps because they have limited transportation, medical conditions, or religious observance on Saturdays) may call the Bar to ask for permission to be fingerprinted at a more convenient location. The Bar is permitting at least some applicants to be fingerprinted by a local police station or state police barracks. Be advised that the police department may charge a service fee as well. For example, the New York City Police Department requires a $17 money order ($15 for the first form, and $1 for each additional form), and fingerprinting services are open various hours, day and night, depending on the precinct. The applicant returns the completed forms and $68 money order (payable to the vendor) to the Bar, which will forward them to the vendor for processing.

National Trend

In the past few years, about half the states in the U.S. have updated their in-house counsel rules, and other states' rules are currently under review. About 25% of the states have adopted in-house counsel licensing rules similar to New Jersey, each with its own application process and requirements. Notably, other states have avoided the formal in-house counsel licensing procedure and instead specifically permit or prohibit non-locally-admitted in-house counsel from practicing within the state without a plenary license, many requiring a filing (called "registration," "certification" or "annual report"), some with widely ranging fees.

While the debate over MJP continues, proponents argue that the new in-house rules create a special category for in-house counsel, distinct from non-attorneys and unlicensed private practice attorneys, designed to legitimize and regularize the practice of in-house counsel for a single client—the employer. However, opponents to in-house counsel licensing argue that the new in-house counsel rules could prove most painful—in terms of administration and expense—for larger corporations with multiple U.S. offices or in regions where in-house counsel are spread among offices in a multi-state metropolitan area, including New York City. Meanwhile, it may prove cheaper and easier to keep in-house counsel in New York.

Key dates:

- **9/10/03**: The New Jersey Supreme Court's Advisory Committee on Professional Ethics issues the new Rule 1:27-2.
- **12/11/03**: The Court issues notice[1] regarding mandatory obligations of in-house counsel licensing rule.
- **1/1/04**: Rule 1:27-2 goes into effect.
- **3/31/04**: Deadline for applications of already-employed in-house counsel (late filings are accepted with the additional $150 late fee).

For More Information:

New Jersey Bar:

http://www.njbarexams.org/incounsel.htm

http://www.njbarexams.org/HC-FAQ.htm

http://www.njbarexams.org/app/In%20House%20Counsel.pdf

http://www.judiciary.state.nj.us/notices/reports/SupAdminDet.pdf

Association of Corporate Counsel ("ACC"):

http://www.acca.com/admissionRules/index.php

http://www.acca.com/public/reference/mjp/mjpscore.pdf

Endnote

1. http://www.njbarexams.org/incounsel.htm.

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Inside

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