



Legal Services of Eastern Missouri, Inc.

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February 18, 2010

Ms. Mattie Cohan
Senior Assistant General Counsel
Office of Legal Affairs
Legal Services Corporation
3333 K Street, NW
Washington, DC, 20007

Re: Interim Final Rule on Attorney's Fees (Repeal of Part 1642)

Dear Ms. Cohan

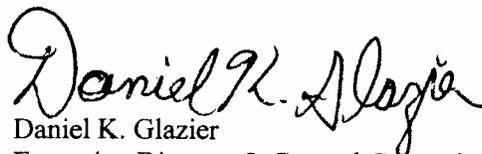
We are writing in support of the Interim final rule published in the Federal Register on February 11, 2010 (75 FR 6816). First, we want to thank you for acting quickly and appropriately to effectuate the will of Congress by publishing the new interim final rule.

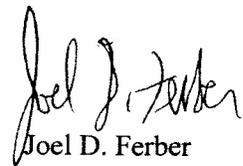
We strongly support the elimination of Part 1642 from 42 CFR. We think that the interim final regulation properly reflects Congressional intent to eliminate the attorney's fees restriction on programs funded by the Legal Services Corporation. The new regulation will enable programs that are financially strapped during these difficult economic times to tap into another critical revenue stream that will greatly assist our mission of achieving access to justice for our clients. We also strongly support your decision to rescind enforcement of the prior regulation pending adoption of the interim final rule as that action is consistent with Congressional action (75 FR at 6817, n. 2). It is vitally important that LSC-funded programs have the ability to seek fees on or after December 16, 2009, the date on which Congress removed the restriction.

We also think that it makes sense to move the provisions of Part 1642 dealing with accounting for and use of attorney's fees and with acceptance of a client to Part 1609, as these provisions are not connected to or derived from the attorney's fees restriction.

Once again, we thank you for taking these important steps to rescind Part 1642 and implement the other related changes. Your actions will greatly assist our efforts to serve needy Missourians during these difficult times and in the years to come.

Sincerely,


Daniel K. Glazier
Executive Director & General Counsel


Joel D. Ferber
Director of Advocacy

Daniel K. Glazier, Executive Director and General Counsel

