



OFFICE OF LEGAL SERVICES INNOVATION
An Office of the Utah Supreme Court

Amended Sandbox Authorization Packet

Davis & Sanchez

August 15, 2022

Contents

1. Utah Supreme Court Amended Order for Authorization to Practice Law
2. Innovation Office Recommendation to the Court

Document 1

In the Supreme Court of the State of Utah

----oo0oo----

In re: Application of Davis & Sanchez, PLLC

AMENDED ORDER FOR AUTHORIZATION TO PRACTICE LAW

Based upon the Utah Supreme Court's plenary and constitutionally granted authority to regulate the practice of law in Utah, and the tenets of Standing Order 15, the Utah Supreme Court orders that Davis & Sanchez, PLLC ("David & Sanchez") is authorized to practice law within the regulatory sandbox and subject to the restrictions outlined below.

The Court has reviewed the recommendation of the Office of Legal Services Innovation ("Innovation Office") dated March 2, 2021, for Davis & Sanchez to be authorized to practice law.

Davis & Sanchez seeks authorization to offer services in the Sandbox as a firm owned by nonlawyers. The firm is owned 100% by Halston Davis. Davis seeks authorization to sell the firm to his son-in-law, a nonlawyer who has run business operations for the firm for 10 years.

The Innovation Office has assessed the risk of harm to Davis & Sanchez's targeted consumers relative to the risk of harm they currently face and has determined that the risk of harm presented by Davis & Sanchez's services is Low.

In light of the Court's responsibility to the public to effectively regulate the practice of law in Utah and in keeping with the tenets of Standing Order 15, the Court now orders as follows:

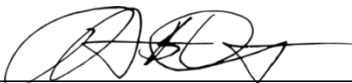
1. Davis & Sanchez is authorized to offer legal services through the following methods:
 - a. Lawyers employed or managed by a nonlawyer
 - b. Lawyers sharing profits with nonlawyers
 - c. Nonlawyer ownership

2. Davis & Sanchez is authorized to provide legal services across the following legal service areas only:
 - a. Accident / Injury
3. Davis & Sanchez shall conform to the Low innovation reporting requirements imposed by the Innovation Office.
4. Davis & Sanchez will prominently display the following disclosure requirements:
 - a. Innovation Office Badge
 - b. Nonlawyer ownership disclosure

If Davis & Sanchez wishes to alter these conditions or requirements, it must submit any such change to the Innovation Office for further assessment. The Innovation Office will assess the proposed change and may permit the change if it deems the change does not materially increase the risks to consumers. If the Innovation Office finds a material increase in risk, then it will present the issue to the Court for further consideration.

This authorization is granted for the duration of the existence of the Sandbox, or until exit and permanent licensure at the discretion of the Court. Authorization is subject to Davis & Sanchez's compliance with the conditions and requirements set forth in the Innovation Office Manual and the Innovation Office Recommendation to the Court and to a verification by the Innovation Office that the company's services are not causing material harm to consumers.

DATED this 10th day of August, 2022.



Matthew B. Durrant
Chief Justice

Document 2



OFFICE OF LEGAL SERVICES INNOVATION

An Office of the Utah Supreme Court

RECOMMENDATION TO THE COURT

APP No. 0038 - DAVIS & SANCHEZ, PLLC

MARCH 2, 2021

CONTENTS

Executive Summary	1
Risk Assessment	2
Sandbox Recommendation	3

EXECUTIVE SUMMARY

Recommendation: Authorize

Applicant: Davis & Sanchez, PLLC

Proposed Model/Service: Davis & Sanchez, PLLC (“Davis & Sanchez”) is a currently operational Utah law firm specializing in workers’ compensation. The firm seeks authorization to transition to nonlawyer ownership.

The firm is currently owned by Halston Davis. He is ready to retire and seeks authorization to sell the firm to his son-in-law, Jacob Hill. Hill has worked as the manager of operations of the firm for approximately 10 years.

The proposed service model is:

- Lawyers employed or managed by nonlawyers
- Nonlawyer ownership (50% or over)

The proposed consumer service area is:

- Accident / Injury

Davis and Sanchez also indicated an interest in exploring the creation of a software-based platform to assist self-represented litigants. However, this interest is not developed enough at this time to be considered.

Target Consumer Market: Victims of workplace accidents.

Sandbox Qualifiers: This business model/service qualifies for the Sandbox because it would feature the following characteristics:

- Lawyers employed or managed by nonlawyers
- Nonlawyer ownership (50% or over)

Regulatory Objective Qualifier:¹ This proposal will facilitate transition of a well-established firm with many active cases into a new business model without undermining the services currently being provided.

Utah Qualifier: Adapted for Utah requirements.

Implementation Qualifier: Ready for immediate implementation.

¹ Regulatory Objective: To ensure consumers have access to a well-developed, high-quality, innovative, affordable, and competitive market for legal services. (Standing Order No. 15)

RISK ASSESSMENT

Target Market: Current clients of the firm (sustaining cases) and victims of workplace accidents.

General Assessment: LOW - MODERATE RISK

Specific Risks: 1. Nonlawyer ownership
2. User communications

SANDBOX RECOMMENDATION

We recommend the Court authorize Davis & Sanchez, PLLC to practice law in the state of Utah, subject to such requirements as the Innovation Office may impose.

Scope of Recommended Authorization

Term of authorization The Innovation Office recommends that the authority be granted for an initial period of 24 months from the date of service launch with the possibility of extension or permanent authorization. Any such extension or permanent authorization would be subject to the applicant complying with the conditions and requirements set forth below and also to a verification by the Innovation Office that Davis & Sanchez has a record of compliance with all requirements and the company's services are not causing harm to consumers.

Recommended legal service models

1. Lawyers employed or managed by a nonlawyer
2. Nonlawyer ownership (50% or more)

Legal service models not recommended Davis & Sanchez expressed an interest in developing a software-based platform to assist self-represented litigants. This concept is not developed enough to be considered a proposal and is not recommended by the Office.

Recommended consumer service areas

1. Accident / Injury

Recommended waivers None

Recommended qualitative compliance requirements Standardized disclosure statements on website and in mobile applications (see Manual):

1. Badge

2. Nonlawyer ownership disclosures

Recommended data reporting requirements LOW - MODERATE risk data reporting requirements (see Manual)