



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

# Amended Sandbox Authorization Packet

## Firmly, LLC

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

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In re: Application of Firmly, LLC

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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 Firmly, LLC 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 October 19, 2020, for Firmly, LLC to be authorized to practice law.

Firmly proposes creating a technology driven, startup-focused law firm to serve and increase access to affordable legal counsel for the growing entrepreneurial community in Silicon Slopes. The firm will develop software tools to facilitate provision of efficient and transparent legal services, purchased by subscription. The firm will include at least one nonlawyer, software developer equity partner.

The Innovation Office has assessed the risk of harm to Firmly's targeted consumers relative to the risk of harm they currently face and has determined that the risk of harm presented by Firmly'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. Firmly is authorized to offer legal services through the following models:
  - a. Nonlawyer ownership

- b. Lawyers sharing profits with nonlawyers
  - c. Lawyers employed or managed by nonlawyers
- 2. Firmly is authorized to provide legal services across the following legal service areas, subject to the restrictions outlined below:
  - a. Business
- 3. Firmly shall conform to the Low Innovation reporting requirements imposed by the Innovation Office.
- 4. Firmly will prominently display the following disclosure requirements:
  - a. Innovation Office Badge
  - b. Nonlawyer provider disclosure
  - c. Nonlawyer ownership disclosure

If Firmly wishes to alter the authorization terms, 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 Firmly'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.



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Matthew B. Durrant  
Chief Justice

# Document 2



OFFICE OF LEGAL SERVICES INNOVATION

An Office of the Utah Supreme Court

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# RECOMMENDATION TO THE COURT

## APP 0019 - FIRMLY, LLC

OCTOBER 19, 2020

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## EXECUTIVE SUMMARY

**Recommendation:** Authorize in part

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**Applicant:** Firmly, LLC

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**Proposed Services:** Less than 50% nonlawyer ownership  
Software provider with lawyer involvement

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**Sandbox Qualifiers:** Nonlawyer ownership

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**Utah Qualifier:** Adapted for Utah requirements

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**Implementation Qualifier:** Services ready for market now

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**Access Qualifier:** Innovation of service facilitated by joint ownership between lawyers and nonlawyer tech and business experts

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**Qualitative Requirements:** Standardized disclosure statements on website and in mobile applications:

- Badge
- Nonlawyer Ownership Disclosure Statement

See Innovation Office Manual for requirement details.

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**Data Reporting Requirements:** Low risk data reporting requirements.

See Innovation Office Manual for requirements.

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## SANDBOX RECOMMENDATION

We recommend the Court **authorize in part** Firmly, LLC (“Firmly”) to practice law in the state of Utah, subject to such requirements as the Innovation Office may impose.

We recommend the following scope of authorization:

1. The Innovation Office recommends that the authority be granted for an initial period of 24 months 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 Firmly has a record of compliance with all requirements and the company’s services are not causing harm to consumers.
2. The Innovation Office recommends authorizing Firmly to practice law only across the following categories of legal service:
  - a. Service Models:
    - i. Less than 50% nonlawyer ownership
  - b. Areas of Service:
    - i. Business
3. The Innovation Office recommends **not authorizing** Firmly to practice law across the following service models requested by the applicant:
  - a. Service Models:
    - i. Software provider with lawyer involvement

Firmly will not be using software to provide legal practice services including advice to its clients. The software platform is a case management, workflow, and communication platform. Utah licensed lawyers will be providing the legal practice services.

4. Relevant requirements:
  - a. Relevant disclosure requirements as outlined in Innovation Office Manual.
  - b. Low risk data reporting requirements as outlined in Innovation Office Manual.

## PROPOSED SERVICES

Firmly proposes creating a technology driven, startup-focused law firm to serve and increase access to affordable legal counsel for the growing entrepreneurial community in Silicon Slopes. The firm will develop software tools to facilitate provision of efficient and transparent legal services, purchased by subscription. The firm will include at least one nonlawyer, software developer equity partner.



## RISK ASSESSMENT

**Target Market:** Startups and entrepreneurs

**General Assessment:** Low risk

**Specific Risks:** 1. Nonlawyer ownership / investment