

in this issue



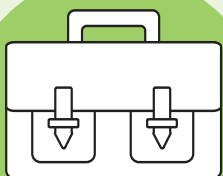
See You in Court, page 2



President's Message, page 3



Wills for Heroes, page 4



Corporate Corner, page 6

Legislative Update

By Kenneth L. Alger II

The 2009 regular session of the Virginia General Assembly adjourned on Saturday, February 28. During the sixty-day work session, legislators introduced various bills addressing concerns of citizens across the Commonwealth. This article discusses several pieces of legislation that may be of particular interest to attorneys.

Use of PDAs behind the wheel. House Bill (HB) 1876 could have the most widespread impact. It prohibits a driver from text messaging or e-mailing while operating a motor vehicle. The bill, which has been codified as § 46.2-1078.1 of the Code of Virginia, forbids the use of any handheld personal communications device to manually enter multiple letters or text or to read text while operating a motor vehicle. Exceptions include the use of global positioning systems (GPS), review of caller identification information, and the use of such devices to report an emergency.

Expanded criminal liability for murder or manslaughter. Under common law, a prosecution for murder or manslaughter cannot occur if the victim dies more than a year and a day after the fatal injury was inflicted. Senate Bill (SB) 1256 creates Va. Code § 19.2-8.1, which provides that the passage of time between injury and death is no obstacle to the prosecution of an individual for murder or manslaughter.

Felony arrest warrants. Felony arrest warrants issued solely on the basis of a private citizen's complaints have been a source of contention in the Commonwealth for some time. HB 1874 and SB 1426 limit the power of magistrates to issue such warrants. These new amendments to Va. Code §§ 19.2-45, 19.2-71, and 19.2-72 prohibit magistrates from issuing felony arrest warrants based solely on the

complaint of a private citizen without substantiation. Magistrates must now seek legal advice from the local Commonwealth's attorney or further investigation by a local law enforcement agency.

Sexual assault response teams. Legislation heavily supported by groups concerned with domestic violence and sexual assault creates sexual assault response teams. HB 2400 requires Commonwealth's attorney's offices to establish such teams, which will be charged with coordinating responses to assaults, establishing policies governing the collection and preservation of evidence, and creating guidelines for the community's response. The teams will consist of various professionals in relevant fields and meet at least annually to produce a coordinated and effective response.

Preliminary protective orders. Changes to Va. Code § 16.1-253.1, which deals with preliminary protective orders, are found in HB 1857. The new bill provides that a court may issue a preliminary protective order against a person who has been released from incarceration or will be released from incarceration within 30 days of the petition for the order. The petition must establish that the crime for which the abuser was incarcerated involved family abuse against the petitioner and that the abuser has made threatening contact with the petitioner while he was incarcerated, thereby renewing the threat. If a preliminary protective order is issued, the court may proceed to issue a "permanent" (two-year) protective order.

Novelty lighters sold to minors. HB 2578 provides that any individual who sells a novelty lighter to a juvenile is subject to a civil penalty up to \$100. The newly created Code section, 18.2-371.4, defines a novelty



see you in court

Michael Stodghill

News and Practice Tips for Virginia Litigators

Federal Preemption after *Wyeth v. Levine*

In *Wyeth v. Levine*, — U.S. —, 129 S.Ct. 1187 (March 4, 2009), the United States Supreme Court held that federal food and drug law did not preempt state-law failure-to-warn claims in a case concerning drug labeling. *Wyeth* has important implications for practitioners in any area in which federal preemption issues may arise.

Background. In 2000, Diana Levine received an intramuscular injection of Wyeth's anti-nausea drug Phenergan. Later that day, Levine received a second injection by IV-push (a rapid injection directly into the IV). The IV-push injection caused some of the Phenergan to enter the vein's surrounding tissue, leading to gangrene and the eventual amputation of Levine's right hand and forearm.

Levine sued Wyeth in Vermont state court, alleging negligence and strict liability/failure to warn. She claimed that Phenergan's labeling, which had been approved by the FDA in 1998, was defective because it did not warn against the risks of IV-push administration, and because it failed to instruct clinicians to use an IV-drip instead. The jury awarded Levine \$7.4 million. Wyeth argued that the Federal Food, Drug & Cosmetic Act ("FDCA"), 21 U.S.C §301 *et seq.*, and associated FDA regulations preempted state tort law and that the jury's verdict was inconsistent with the FDA's approval of the warning label. The trial court disagreed, and the Vermont Supreme Court affirmed.

The Court's holding. The Supreme Court held that neither the FDCA nor Wyeth's asserted inability to comply with both federal and state law required preemption. The Court pointed out that, while federal law generally requires agency

approval of label changes, an FDA regulation expressly permitted unilateral, pre-approval label changes designed to strengthen a warning. The Court also noted that the FDCA's legislative history demonstrated no intent to preempt state laws, and it refused to defer to language in a 2006 FDA regulation claiming that state failure-to-warn claims threaten the FDA's statutory role.

Implications. The Court's prior decisions had held that federal preemption can occur when it is impossible to comply with both state and federal law, *see Fidelity Fed. Sav. & Loan Ass'n v. De la Cuesta*, 458 U.S. 141, 153 (1982), or when state law creates an "unacceptable obstacle to the accomplishment and execution of the full purposes and objectives of Congress." *Hines v. Davidowitz*, 312 U.S. 52, 67 (1941). In *Wyeth*, the Court noted first that Congress's intent is the "ultimate touchstone" in every preemption case; and, second, that where Congress legislates in a field traditionally occupied by the states, the states' police powers presumably are not superseded "unless that was the clear and manifest purpose of Congress." 129 S.Ct. at 1194-95. Despite the FDCA's comprehensive scope, the Court found no preemption because its legislative history did not demonstrate the intent to require FDA pre-approval of all warnings, and because of the FDA regulation permitting labeling changes strengthening a warning. *Wyeth* thus suggests greater federal deference to the states' police powers and a greater emphasis on Congress's expressed intent, rather than the scope of the federal regulatory regime, in deciding preemption issues.

The *Wyeth* decision also has significant consequences for state tort law. In Virginia, for instance, violation of a failure-to-warn statute constitutes negligence *per se*; pleading and proof of common-law elements

of negligence are not required. *See, e.g., McClanahan v. California Spray-Chem. Corp.*, 194 Va. 842, 852 (1953). After *Wyeth*, manufacturers of federally regulated products will be hard-pressed to argue that federal law mandates a different quantum of proof, absent a specific expression of congressional intent to preempt state law.

In addition, Virginia, like many states, has its own Drug Control Act, Va. Code §54.1-3400 *et seq.* Its misbranding provisions require, among other things, adequate instructions and warnings. Virginia also follows the Restatement (Second) of Torts § 388 in failure-to-warn cases generally. *See, e.g., Featherall v. Firestone Tire & Rubber Co.*, 219 Va. 949 (1979). Under § 388, the manufacturer of a chattel is liable for failure to warn when he: (1) knows or has reason to know that the chattel is or is likely to be dangerous for the use for which it is supplied; (2) has no reason to believe that those for whose use the chattel is supplied will realize its dangerous condition; and (3) fails to exercise reasonable care to inform them of its dangerous conditions or of the facts which make it likely to be more dangerous. *Featherall*, 219 Va. at 962. Given extensive federal regulation of food and drugs, it is difficult to envision a situation in which Virginia statutory or common law requires a warning that is stronger than, or different from, that required by federal law. Should such an unlikely case arise, however, the manufacturer will find it more difficult to argue preemption after *Wyeth*.

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message from the president

Jennifer McClellan



This year marks the 35th anniversary of the establishment of the Virginia State Bar Young Lawyers Conference. We will celebrate our anniversary as the bar year comes to a close, at our annual luncheon at the VSB Annual Meeting in Virginia Beach on June 19. At the Annual Meeting, we will also continue our tradition of hosting the debate among candidates for Attorney General, with former Charlottesville *Daily Progress* reporter and Sorensen Institute Executive Director Bob Gibson moderating. We will also co-sponsor, with VSB's General Practice Section, an educational program that will focus on starting your own practice, as part of this year's "Unlock Your Potential" project. **Jennifer Haberlin** and **Yvette Ayala** are working hard to ensure that these programs are successful, while **Andrew Tank** is busy organizing our athletics programs.

It has been an exciting year as we began the process of unlocking our potential for excellence.

We started off the year in July, with another successful Oliver Hill/Samuel Tucker Pre-Law Institute at the University of Richmond, organized by co-directors **Rasheeda Matthews** and **Yvette Ayala**. Their success is evident in the record number of applicants—83—who have applied for the 24 slots available for the next Institute, scheduled for July 19–24, 2009.

We also accepted VSB President Manny Capsalis's challenge, to the bar as a whole, to increase diversity in the profession by expanding our Minority Pre-Law Conference from two programs—serving Northern Virginia and Southwest Virginia—to three, adding a new conference at William & Mary to serve the eastern part of the state. Thanks to the dedication of **Samantha Ahuja**, **Jeffrey Bourne**, **Macel Janoschka**, and **Lindsey Waters**, all three programs were a success. In fact, the Southwest Virginia conference set a record for attendance in its third year.

Not resting on their laurels, Macel and Lindsey, as co-chairs of the Women & Minorities in the Profession Commission, are also working

on a study of why women leave the practice of law. Keep an eye out for their results and conclusions in an upcoming issue of *Docket Call*.

We also continued the tradition of successful Women & Minorities in the Profession Bench-Bar Dinners, honoring 13 newly elected women and minority judges in the Commonwealth. This year, Justice Bernard Goodwyn of the Supreme Court of Virginia served as our keynote speaker. **Mollie Barton** and **Alana Ritenour**

Outreach Committee conducted CLE programs on the Immigration Consequences of Criminal Convictions in Loudoun and Fairfax Counties, which for the first time generated revenue for the YLC. As a testament to the program's success, the ABA appears to have copied the program, including panel speakers, for its own CLE.

The Wills for Heroes program, which has now written more than 1,000 wills for first responders across the Commonwealth,

I will treasure my time as a Young Lawyer, as well as the friendships I made along the way. And I will always be a Young Lawyer at heart.

deserve the lion's share of the credit for such an inspiring evening.

We revamped and re-launched our Professional Development Conference under the enthusiastic leadership of **Robert Byrne**. The conference was moved from Charlottesville to Richmond and from spring to fall, and we were able to draw an exciting array of speakers who lived up to the conference's theme, "Learning from the Masters."

More than 1,000 men and women were admitted to practice in the courts of Virginia at our fall Admission & Orientation Ceremony at the Richmond Convention Center. This was the largest such ceremony ever, and it was organized superbly by **Bryan Scott**, who took over as chair from his wife, Francie Scott. The next day, **Ryan Glasgow** and **Ronald Page** conducted a successful First Day in Practice Seminar, co-sponsored by the General Practice Section.

Under the new leadership of **Federico Serrano** and **Ni Ni Tin**, the Immigrant

expanded to the City of Portsmouth and the counties of Hanover and Henrico. Under the leadership of **Andrew Geyer**, this program continues to find success everywhere it goes.

We adopted a new Five-Year Long-Range Plan under the leadership of **Sarah Petcher**, and we launched a new Web page. And we have a number of projects still in the works, including programs from such committees as the Domestic Violence Safety Project, Students' Day at the Capitol, Community Law Day, Board Match, No Bills Night, and Emergency Legal Services.

As we near the close of this bar year, I can't help but feel a bit nostalgic. This marks **Meghan Cloud's** last year as editor of *Docket Call*. A special thanks for her dedication to producing an award-winning newsletter four times a year.

This also marks my final column as President. I have thoroughly enjoyed serving you and working with the excellent members of our Board, who have made my job so much

continued next page

easier and who continue to keep the YLC running like a well-oiled machine. A special thank you to departing members **Robby Denning, Dan Gray, Audra Hale-Maddox, Gina Marine, Rasheeda Matthews, Stephen Pfeiffer, and Erin Whaley**. And an extra special thank you to **Maureen Stengel**, our Board Liaison, institutional memory, den mother, and friend. Without Maureen, we would be lost.

Fortunately, she has **Catherine Huband** to help keep us on the right track.

While I have one more year on the Board as Immediate Past President, I aged out in December. I cannot help but feel wistful as I look back over not only the past year, but also my 12 years as a member of the YLC. I will treasure my time as a Young Lawyer, as well as

the friendships I made along the way. And I will always be a Young Lawyer at heart.

Jennifer McClellan is Assistant General Counsel, Mid-Atlantic South for Verizon Communications in Richmond, Virginia. She is also a member of the Virginia House of Delegates, representing the 71st District.

Did You Know?

The Virginia Women Attorneys Association Is the Only One of Its Kind

The Virginia Women Attorneys Association (VWAA) was founded in 1981 to advance the interests of women attorneys in Virginia, to encourage their mutual improvement and social interaction, and to promote the interests of women under the law. Twenty-eight years later, it remains the only statewide bar association dedicated to the needs of female attorneys, both as professionals and as women. According to its official mission, the VWAA is dedicated—in part—to helping women attorneys develop their professional practice and achieve their potential, and to affecting public policy for the benefit of the women of the Commonwealth.

To that end, the VWAA has created judicial evaluation criteria which are merit-based and have been implemented in reviewing the

credentials of candidates seeking judicial office. The VWAA process, and the summaries its members provide to decision-makers, has served as a model for other local bars and proved a worthwhile replacement for bar-wide votes, as well as less formal processes. Additionally, the VWAA has developed its “You Be the Judge” program, which informs interested attorneys about the judicial selection process and solicits insights from judges and legislators on how candidates can best position themselves for appointment.

The VWAA's work is not limited to the judicial appointment process. It provides a forum for women to publish scholarly articles through its periodic journal, *Lex Claudia*. The organization also hosts a conference every other

year that includes substantial CLE credit in an environment that allows attorneys throughout the Commonwealth a chance to network and honor contributions made to the promotion of women in the law. Local VWAA chapters throughout the state also organize networking and learning events. The VWAA recently co-sponsored a forum in Charlottesville featuring Senior Supreme Court Justice Elizabeth B. Lacy, which launched a new mentorship program organized by the Charlottesville-Albemarle Bar Association Women Lawyers Section.

Membership in VWAA is open to all licensed Virginia attorneys. Dues vary with years in practice, and public service practitioners are entitled to special rates. Additional details can be found at <http://www.vwaa.org>.

Wills for Heroes: Off to a Great Start in 2009

By Andrew G. Geyer

The Wills for Heroes program is off to a great start in 2009, having already successfully served two communities in the Commonwealth. The program recently served more than 200 first responders—fire fighters, police, sheriff's deputies, and other emergency personnel—and their spouses in Hanover County in January and February and more than 200 first responders and their spouses in Henrico County in March and April. The success of the Hanover and Henrico programs is due in large part to the efforts of local volunteers, who were led by Carl J. Whitmeyer II and Rhodes B. Ritenour, the local committee chairs for Hanover and Henrico, respectively.

The VSB Young Lawyers Conference sponsors the Wills for Heroes program in conjunction

with the Virginia Bar Association's Young Lawyers Division. Created in the wake of the September 11, 2001, terrorist attacks, the program offers free wills, durable powers of attorney, and advance medical directives to Virginia's first responders and their spouses.

As part of the program, volunteer attorneys must attend a free CLE seminar to learn about the program and the computer software that is used to prepare the estate planning documents. Prior to receiving the documents, first responders must attend a presentation to educate them about the benefits of estate planning and the documents the program offers.

The Wills for Heroes program is scheduled to be in Arlington in May/June 2009 and in Prince

William in September/October 2009. For more information and to get involved, contact Andy Geyer, at ageyer@hunton.com, or Anishiya Abrol, at aabrol@hhlaw.com.



▲ Volunteers for the recent Wills for Heroes event in Hanover County, led by Carl Whitmeyer (back row, second from right).



legal ethics corner

Jeffrey Hamilton Geiger

You Make the Call

Lawyers search for and gather evidence. They do not “create” evidence. Yet, counsel are often intimately involved in the preparation of affidavits (as in federal summary judgment proceedings), expert reports, and answers to interrogatories, which are signed by the client or a witness. The ethical constraint is that the writing must honestly capture the testimony that the party, expert, or affiant wishes to present—as opposed to lawyer-created testimony that the lawyer wishes to present. Of course, the affidavit or report must be reviewed, adopted, and signed by the party voluntarily.

In Legal Ethics Opinion 1726, the Standing Committee on Legal Ethics considered the propriety of submitting, in a workers’ compensation claim proceeding, a physician’s report on hospital stationery that had been drafted by the lawyer. Apparently, the draft report had been sent back and forth between defense counsel and the physician,

who eventually signed the final version. The question was whether it was ethically permissible for defense counsel to have submitted the report as evidence in the worker’s compensation proceeding.

The Committee opined that the defense counsel’s writing of the medical report for submission to, and review, adoption, and signature by, the physician did not violate ethics rules. Again, the key is to avoid putting words in the mouth of the party to whom the document ultimately is ascribed. As LEO 1726 puts it, while the form of expression may be that of the lawyer, the substantive content should be that of the signatory.

While LEO 1726 was decided under the Virginia Code of Professional Responsibility, the current Rules of Professional Conduct dictate a similar outcome. Consider the following:

- A lawyer shall not make a false statement of fact to the court or offer

evidence that the lawyer knows to be false. *See* Va. R. of Prof. Conduct 3.3.

- A lawyer shall not falsify evidence or assist a witness to testify falsely. *See* Va. R. of Prof. Conduct 3.4.
- It is professional misconduct for a lawyer to “engage in conduct involving dishonesty, fraud, deceit or misrepresentation which reflects adversely on the lawyer’s fitness to practice law.” *See* Va. R. of Prof. Conduct 8.4.

Especially where a draft affidavit or report has undergone several rounds of editing, Virginia lawyers would do well to review the final document with the form/substance distinction in mind.

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Legislative Update, continued from page 1

lighter as a lighter “designed to resemble a cartoon character, toy, gun, watch, musical instrument, vehicle, animal, food, or beverage” or “a fanciful article that plays musical notes, has flashing lights, or has other entertaining features that are appealing to or intended for use by juveniles.”

Video and audio systems in district court. In a continued effort to reduce costs, HB 2108 and SB 1268 provide that if a two-way electronic video and audio communication system is available in a district court, it shall be used. The requirement is limited to pre-trial criminal proceedings to determine bail or representation by counsel, or in any proceeding that would require the transportation of an incarcerated individual to

the court for an in-person appearance. The full version may be found at Va. Code § 19.2-3.1.

Felon-in-possession. A number of bills expand on existing statutes. HB 2178 makes it a Class Six felony for a convicted felon to possess ammunition for a firearm. Under § 18.2-308.2, it was already illegal for a convicted felon to possess a firearm, a stun weapon, or explosive material.

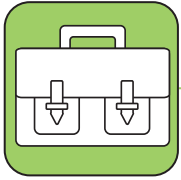
Child pornography. HB 2397 adds a venue provision to Va. Code § 18.2-374.1:1, the statute that punishes possession, transmission, and reproduction of child pornography. The statute has been expanded to provide that venue is proper where the unlawful act occurs or where any child pornography is produced, reproduced, found,

stored, received, or possessed in violation of the statute.

Identity theft. HB 2402 and SB 1301 clarify existing Virginia law pertaining to identity theft. The new bill prohibits the use of another’s identifying information to obtain money, credit, or loans without authorization. The bills clarify existing § 18.2-186.3, which criminalizes only identity theft aimed at obtaining “goods or services.”

To read the full version of any of these new laws, visit the General Assembly’s Web site, at <http://legis.state.va.us>.

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corporate corner

David C. Nahm

Issues of Interest for Virginia Transactional Attorneys

The Supreme Court of Virginia Clarifies Fiduciary Duties among Members of LLCs

As an attorney, one of the things I idly ponder as I sit in Harrisonburg's Valley Mall, in front of Hot Topic or County Cookin' on a Saturday afternoon, is the nature of fiduciary duties. It's just the sort of thing the mall makes me think about. Happily, I now know that if I were a manager of a limited liability company, I wouldn't owe a fiduciary duty to its members. A recent opinion by the Supreme Court of Virginia, *Remora Investments, L.L.C. v. Orr*, 277 Va. 316 (2009), made this clear.

In *Remora*, the Supreme Court held that the manager of a limited liability company does not owe a fiduciary duty to the individual members of the company—only to the company itself. The company in question was called O.A.L.L.C. It had two members—David L. Orr and Remora Investments, L.L.C. The purpose of O.A.L.L.C. was to “purchase, own, develop, manage, invest in and sell or otherwise dispose of” real estate. Remora was a limited liability company managed by Richard L. Adams, Jr., and owned primarily by a trust set up for Mr. Adams's children. In any case, Mr. Orr was designated the manager of O.A.L.L.C. under its operating agreement.

Here, I might note that *Remora v. Orr* sounds like an adventure on the high seas.

O.A.L.L.C. was itself a member of another limited liability company, Beaumeade 1A Investment L.L.C., along with VA Value L.L.C. Mr. Orr was the manager of Beaumeade as well. The purpose of Beaumeade was to “acquire a vacant lot, build a building on it, lease it, then sell it,” which it did, eventually selling the land for more than two million dollars. Mr. Orr

directed that the portion of the proceeds from the sale that was payable to O.A.L.L.C., more than a million dollars, be deposited in O.A.L.L.C.'s investment account.

However, Remora wanted the money to be distributed to O.A.L.L.C.'s members, rather than deposited in an investment account. It filed suit against Mr. Orr and O.A.L.L.C. seeking, among various other remedies, the dissolution of O.A.L.L.C. and the distribution of its assets. Mr. Orr demurred to the complaint, successfully. Remora filed an amended complaint, and then a second amended complaint, again requesting dissolution and disbursement. Remora also sought an accounting, as well as judgment against Mr. Orr for the breach of fiduciary duties that Remora claimed Orr owed to it. The trial court, after referring the matter to a commissioner in chancery, held that a claim for breach of fiduciary duty cannot be brought by one member of a limited liability company against another member or manager, and that Remora thus didn't have standing to bring suit against Mr. Orr.

On appeal, the Supreme Court of Virginia upheld that ruling, noting that limited liability companies are like corporations in that they are separate entities that shield members from personal liability based on the entity's actions. The Court reviewed the two sections of the Code of Virginia covering standards of conduct for LLC managers and corporate directors (§§ 13.1-1021.1 and 13.1-690, respectively) and pointed out that they have almost identical language. Both explicitly impose a duty running from managers and directors to the company or corporation, but not to its members or shareholders—or between members or shareholders. The Court then contrasted this with the statute governing general partnerships, which provides that “a partner owes to the partnership and the other partners . . . the duty of loyalty and the duty of care.” Va. Code § 50-

73.102(A). The Code thus specifically imposes upon partners in a partnership a duty to the other partners.

The Supreme Court, agreeing with the trial court's reasoning, decided that if the General Assembly had wanted to include a similar duty for members of limited liability companies, it could have done so. Evidently, it chose not to. As a result, no duty exists between the members and managers themselves, as individuals. Remora thus lacked standing, as a member of O.A.L.L.C., to sue O.A.L.L.C.'s other member for breach of fiduciary duty.

And so, biting into a pretzel from Auntie Annie's, I wonder, “What can I, a young attorney with a commercial practice, learn from this case?” At the end of the opinion, the Court notes that though there is no duty imposed by law, nothing prevents additional duties from being incorporated into operating agreements. Operating agreements regularly outline the powers, duties, and responsibilities of the company's manager. When advising a client during the organization of a limited liability company, or the incorporation of a corporation, consider including a duty by the manager to the members themselves (though you might think twice, of course, if your client will be the manager). We have all probably handled organizations where one party is providing the money to start the company and another is providing the work. Including the additional duties is another piece of protection for the non-manager member that might be useful in some cases. However, since it is not a duty imposed by law, the intrepid attorney will need to bring it to the attention of his clients.

David C. Nahm is an associate with Wharton Aldhizer & Weaver, PLC, in Harrisonburg. You can reach him at dnahm@wawlaw.com.

continued next page

Virginia Attorneys Assist with Citizenship Day 2009

By Jennifer S. Varughese

The YLC's Immigrant Outreach Committee co-sponsored the Citizenship Day 2009 event with the American Immigration Lawyers Association (AILA) in Arlington and Virginia Beach on April 18, 2009. AILA is the nation's largest network of immigration practitioners. During the event, attorneys helped lawful permanent residents fill out naturalization applications for submission to U.S. Citizenship and Immigration Services.

After completing an orientation, volunteer attorneys were paired with citizenship applicants. To be eligible for citizenship, at a minimum, applicants must have had a green card for five years (or three years, if lawful permanent residency was gained through marriage to a U.S. citizen), meet residency

requirements, and have good moral character. Any advanced immigration issues, particularly those due to criminal issues or extended absences from the United States, were reserved for immigration practitioners.

Upon completion of the application, applicants were given a list of resources, including locations where English language classes are held and where they might review their knowledge of U.S. history and government. Once the citizenship application is mailed, applicants will be required to appear for a biometrics appointment, at which fingerprints and photographs are taken, and a citizenship interview. If successful, applicants will then attend an oath ceremony and be eligible for a U.S. passport.

Members of the Immigrant Outreach Committee were excited to see attorneys from many different practice areas come together with citizenship applicants from countries all over the world. We look forward to an equally successful event next year, and we welcome inquiries from all those who would like to take part.

Jennifer S. Varughese is the lead immigration attorney at Livesay & Myers, P.C., in Woodbridge, VA. She serves as co-chair of the VSB's Immigrant Outreach Committee and is a member of AILA's Outreach Committee. You can reach her at varughese@lawyers-virginia.com.

Due to space constraints, *Criminal Corner* is taking a bye. It will reappear in our summer issue.

Are you connected?

Don't miss a thing!

Log on to <https://member.vsb.org/vsbportal/> to update your e-mail address and membership information in order to get the latest Young Lawyers Conference updates and the new electronic *Docket Call*.

You're busier than ever, and you have more tools to keep you connected than ever before. That's why we want to make sure we give you the latest YLC updates the way YOU communicate. Fast, convenient, and easy.

To get the latest electronic version of *Docket Call*, and other up-to-the-minute information, be sure to get connected at <https://member.vsb.org/vsbportal/> and check the YLC site for regular updates. We're committed to delivering YLC news your way.

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Upcoming Events

- 6/18–21** | Virginia State Bar 71st Annual Meeting
- 6/19** | YLC Annual Membership Meeting and Reception
- 7/19–24** | Oliver Hill/Samuel Tucker Pre-Law Institute
- 9/25** | Professional Development Conference
- 9/26** | YLC Leaders Conference
- 11/04** | VSB YLC Admission & Orientation Ceremony
- 11/09–16** | VSB 36th Annual Mid-Year Legal Seminar

For a complete, up-to-date list of events, please visit: <http://www.vsb.org/site/events/>

Address Change?

If you have moved or changed your address, please see the VSB Membership Department's page on the Web for an address update form, at www.vsb.org/site/members/.

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