Docket Call

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The newsletter of the Young Lawyers Conference of the Virginia State Bar

In this issue:

Notable Exceptions to the Statute of Frauds in Virginia

Monica Handa

Statute of Frauds

Everyone knows the old adage: an oral contract is only as good as the paper on which it is written. But is that true? While law school taught us that the statute of frauds requires certain agreements to be in writing, as attorneys we must acknowledge practical exceptions to that rule. Some notable exceptions worth remembering are outlined below.

Performance within One Year

Section 11-2(8) of the Virginia Code excludes from the statute of frauds any agreement that can be performed within one year of its execution. Like the rule against perpetuities, even unlikely, hypothetical situations may exclude an agreement from the statute of frauds: "a writing is not needed so long as the contract can be performed within a year, even if only by some improbable event." *Shiple v. Jackson*, 56 Va. Cir. 235, 236 (Richmond 2001). For example, an oral promise by a son to provide assistance to his parents during their lifetime is not subject to the statute of frauds, as the contract is capable of full performance within one year if his parents die during that time. See *Grant v. Grant*, 67 Va. Cir. 412 (Roanoke 2005). In fact, the hypothetical unexpected death of one party to the contract within one year is often the "improbable event" of which the courts speak. At-will contracts fundamentally comply with the one year requirement and are therefore exempt from the writing requirement. *Wade v. Foreign Mission Bd. of the Southern Baptist Convention*, 21 Va. Cir. 309, 313 (Richmond 1990).

Equitable Estoppel

If a plaintiff can prove equitable estoppel, a defendant may not employ the statute of frauds as a defense to an alleged breach of contract. Equitable estoppel requires a showing of (1) a representation by the defendant; (2) reliance by the plaintiff; (3) a change of position by the plaintiff; and (4) a detriment to the plaintiff resulting from the defendant's representation. *Browning v. Federal National Mortgage Ass'n*, 2012 U.S. Dist. LEXIS 47819, *9 (W.D. Va. April 5, 2012). There is no fraud requirement, so long as the reliance was "reasonable." *Nargi v. CaMac Corporation*, 820 F. Supp. 253, 256-57 (W.D. Va. 1992).

Courts have been careful to characterize equitable estoppel as a "shield," rather than a "sword," meaning that this defense does not create any new right or cause of action. Instead, "it serves to prevent losses otherwise inescapable and to preserve rights already acquired.'" *Meriweather Mowing Service, Inc. v. St. Anne's-Belfield, Inc.*, 51 Va. Cir. 517, 519 (Charlottesville 2000) (quoting *Bohannon v. Riverton Investment Corp.*, 1993 WL 945938, **4 (Va. Cir. Ct. 1993)).

Part Performance

Part performance has three elements: First, the oral agreement must be definite, certain, and unequivocal in its terms. Second, the acts done in part performance must be wholly consistent with the terms of the alleged contract. Third, the contract must be so far performed that refusal to enforce it would work a fraud upon the party seeking its enforcement. *Guzy v. Hoban*, 43 Va. Cir. 33, 35-36 (Virginia Beach 1997).

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Food for Thought

This list is far from exhaustive, as additional statutory exceptions can remove an agreement from the statute of frauds. Remember, though, that courts are generally reluctant to recognize exceptions to the statute of frauds in matters involving real property, *Kane v. Richardson*, 68 Va. Cir. 465, 465 (Richmond 2005), and some courts may frown upon non-statutory exceptions like equitable estoppel and part performance altogether. Even when the statute of frauds does apply, it only requires the "essential elements" of the contract to be in writing, meaning that "an enforceable contract may consist of written and non-written terms without violating the statute of frauds." *Bowen v. Omran*, 30 Va. Cir. 85, 87 (Fairfax 1993). Keeping all of that in mind, the most important thing to consider when faced with a statute of frauds question is the policy underlying the doctrine: wherever the absence of a writing will result in fraud, the statute of frauds generally requires a written contract.

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YLC Hosts CLE on Avoiding the Pitfalls of Representing Non-Citizens in Criminal Proceedings

Shiva Hamidinia

The Virginia State Bar's YLC Immigrant Outreach Committee hosted a four-credit Virginia CLE at the George Mason School of Law on Monday, December 3, concerning the Immigration Consequences of Criminal Convictions. Nearly 30 participants attended the seminar focusing on the intersection of criminal and immigration law. While criminal attorneys may often try to obtain reduced sentences for their clients, these good intentions can have a devastating impact on a foreign national's immigration status, as well as exposing the unwary criminal attorney to potential malpractice claims.

The program hosted a panel of four highly esteemed criminal and immigration practitioners. Each speaker provided his/her unique insight on avoiding the pitfalls of representing non-citizens in criminal proceedings. Professor Albert M. Benítez, who teaches immigration law at the George Washington University School of Law, and Ms. Rachael Petterson, an immigration lawyer at the Yacub Law Offices, led the discussion on avoiding the criminal grounds of deportation and removal. They outlined the specific types of criminal convictions that may lead to deportation of a foreign national, which may include such convictions as petty theft, domestic violence, drug possession, forgery, bribery, and even fraud. They also discussed the seminal case of *Padilla v. Kentucky*, 130 S. Ct. 1473 (2010), which held that an attorney's failure to affirmatively and accurately advise a non-citizen client about the deportation consequences of a conviction may constitute a claim for ineffective assistance of counsel.

Jonathan P. Sheldon, who has been involved in many high profile capital cases, including the defense of the Beltway Sniper, Justin Wolfe, Paul Powell, and other individuals on death row, provided his invaluable insight on post-conviction habeas relief. Mr. Sheldon's presentation highlighted the steps an attorney can take to reverse a criminal conviction that has already subjected a foreign national client to deportation proceedings. Lastly, The Honorable Wayne R. Iskra, of the Arlington immigration court, provided participants with an overview of navigating the complex immigration court system.

Shiva Hamidinia, co-chair of the Immigrant Outreach Committee and an attorney practicing construction law in Tysons Corner, Virginia, served as the moderator for the program. Ms. Hamidinia and co-chair Jamilah LeCruise are most appreciative to these speakers for sharing their expertise.

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President's Message

Brian Charville

As I've seen the accomplishments of the YLC firsthand over the past several years, especially since last July as I've been your President, I've come to realize that a lot of the YLC's cutting-edge dynamism comes from a handful of members who take it upon themselves to make the YLC a great bar organization, not just a good one. These innovators in many cases either joined programs that they expanded or created new programs out of whole cloth to address member needs or the needs of the public. I'll take this President's Message to describe some of the leading innovators among us and to explain why their innovations matter to us and the public.

Two of our leading innovators are folks who are in their first full year of active YLC involvement. Jean Humbrecht of Alexandria is the chair of our Community Law Week / Law Day programs and has been working with our Circuit Representatives since last fall to ensure that Law Day / Law Week programs are undertaken in as many Virginia localities as possible. Jean is trying to provide ready-made, approachable programs for local leaders to carry out. Similarly Helen Chong, chair of the YLC's Commission on Children and the Law, has been developing a presentation about cyberbullying that will be aimed at secondary school students.

You've probably already read about the Conference's new Professional Development Series which debuted in February and was featured in the last issue of Docket Call. Chris Fortier, the Series' chair, developed it as an extension of his work chairing the YLC's fall Professional Development Conference. He recognized the quality of the CLE and other content that the YLC was producing at the PDC, asked "Couldn't we do more with this?" and came up with the Series. It's designed to make the YLC's and other bar organizations' content available to Bar members throughout the year as substantive law and professional-development resources. The Series consists of weekly postings on our website (http://www.vsb.org/site/conferences/ylc/pds) in the form of webcasts or podcasts. While each week's content is posted only for the given week, it can be obtained at any time directly from Chris via the webpage. The PDS innovation comes on the heels of Chris's improvements to the PDC in 2012, namely through expansion of the program from Richmond to Washington, D.C. as well. And he's not stopping there – he plans for attendees to be able to attend at a Tidewater location, in addition to Richmond and D.C., when the PDC returns this October.

Another one of our visionary members who recently became active in the YLC and hit the ground running is Paula Bowen of Martinsville. After hearing about YLC opportunities at the Bench / Bar Celebration Dinner in November, Paula volunteered to become the Circuit Representative for the 21st Circuit. Not only that, but she immediately began planning a CLE program that was presented in January addressing human trafficking. Likewise Pat Foltz, the Circuit Representative for the 31st Circuit, noted that other bar organizations across the country were beginning to develop and distribute smartphone apps with resources for their members and thought it'd be a good idea for us to have one as well. While that idea has now been subsumed by the Virginia State Bar's unveiling of its member app., Pat is working with State Bar staff to ensure that resources of use to young and new lawyers are included in the VSB app.

I highlight these innovators to show how sometimes simple brainstorms can lead the YLC and the larger Bar to better address the needs of our members and the public. Each of the YLC members I've highlighted in this Message are great examples of ideas being translated into real-world results through hard work and dedication. Thanks to each of them, and here's to them and the other innovators among us!

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Visit http://www.vsb.org/site/conferences/ylc/docket-call-newsletter

Family Law Corner

Andrew R. Tank

Calling Children As Witnesses in Custody Cases Part 1: Can you? Should you?

Most parents involved in custody litigation have no desire to put their children in the position of testifying at their custody trial. But there are exceptions, and if you practice family law you will inevitably represent some of these people. Most are well-intentioned people that believe their child genuinely wants to live with them, that it is in the child's best interest to do so, and that the child can and should be allowed to express his or her preference to the judge. So, as the lawyer, what should you tell these well-intentioned parents?

The first questions are whether the court cares about the child's preference and whether the child is allowed to testify to it. The answers to both questions are that it depends whether the Court deems the child to be "of reasonable intelligence, understanding, age and experience to express such a preference."[1] If the Court finds that the child meets that criterion, the Court is required to allow the child to testify[2] and to consider the child's preference in making his/her decision.[3] There is no specific age that automatically qualifies a child to testify to his/her preference. Teenagers will almost always qualify.[4] It is less likely that younger children will be allowed to express their preference, but there is no minimum age for being allowed to do so. In 1986, for example, the Court of Appeals upheld the decision of a trial court that placed considerable weight on the expressed preference of an eight-year-old child.[5]

Even if a child meets the criteria to testify to his or her preference, that does not mean it will help your case. The child's preference is by no means controlling. It is just one of at least nine factors the Court must consider.[6] Worse, there is a good chance that calling the child as a witness will backfire, even if the child is convincing on the witness stand. There is a good chance that the parent's decision to have the child testify will cause the judge to draw a negative inference about that parent's judgment. After all, the Court's primary objective in any custody trial is to make a ruling consistent with the child's best interest, which means determining which parent is more likely to make decisions to serve those interests. And from anecdotal experience, I feel confident saying that all things being equal, most judges (and most people) do not think it is in a child's best interest to "pick a side" between his/her parents in Court. Additionally, the child's testimony has the potential to damage the child's relationship with the parent the child does not want to live with, which is a problem because Courts assume that children benefit from having strong relationships with both parents, not just the one they live with. Finally, the Court might suspect your client pressured the child to testify and/or "coached" him or her about what to say on the stand.

Despite all the aforementioned reasons not to call a child to testify, I did it just last month and I do not regret it. That might seem to contradict the rest of this article, but I can explain—I promise! In part 2 of this article I will discuss when you should consider calling a child to testify, how to prepare a child to testify, and how to present the testimony to the Court effectively. Stay tuned!

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1 Va. Code Ann. § 124.3(8) (2012).
2 *See, Helper v. Helper,* 195 Va. 611 (1954).
3 *See, e.g., Hall v. Hall,* 210 Va. 668 (1969).
4 *See, e.g., Helper,* 195 Va. 611 (12 year old); *Taylor v. Taylor,* 182 Va. 602 (1944) (14 year old); and *Addison v. Addison,* 210 Va. 104 (1969) (13 and 16 year olds).
5 *Turner v. Turner,* 3 Va. App. 31 (1986).
6 Va. Code Ann. § 124.3 (2012).

Whatever Happened to Anna Nicole Smith?

Welcome to the latest installment of Bankruptcy Bullets!

If you're a bankruptcy attorney, no doubt you groaned at the title of this edition's Bankruptcy Bullets! For nearly two years now, bankruptcy practitioners nationally have been inundated with extensive analysis of the United States Supreme Court's decision in *Stern v. Marshall*, 131 S. Ct. 2594 (2011) and its aftermath. If you do not either practice bankruptcy law or follow each of the high court's opinions, perhaps you have no idea that Anna Nicole Smith's most lasting legacy lies in the bankruptcy court.

Anna Nicole Smith (legally Vickie Lynn Marshall), you may recall, was a blonde bombshell former playboy playmate. She was famously married to oil mogul J. Howard Marshall, 62 years her senior, who died in 1995. When Anna Nicole filed for bankruptcy shortly thereafter (prompted by her inability to satisfy a sexual harassment judgment), Pierce Marshall, J. Howard's son, filed a complaint in the bankruptcy case alleging that Anna Nicole had defamed him and that the defamation claim could not be discharged in her bankruptcy. Anna Nicole counterclaimed, alleging tortious interference with an expected gift from J. Howard's estate. The bankruptcy court granted summary judgment for Anna Nicole on the defamation claim and awarded her $400 million on her counterclaim against Pierce. Fifteen years and many appeals later and Howard K. Stern having taken over as executor of Anna Nicole's estate after her death in 2007, *Stern v. Marshall* marked the second time this dispute was in front of the U.S. Supreme Court.

Stern v. Marshall put two issues before the Court: Was Anna Nicole's tortious interference claim a "core proceeding" under which the bankruptcy court could issue a final judgment? And if so, did Article III of the United States Constitution bar the bankruptcy court from deciding it?

According to 28 U.S.C. §157, bankruptcy judges may hear, determine and enter an order or judgment on a "core proceeding" arising under or in a bankruptcy case. Section 157 contains a non-exclusive list of core proceedings that includes "counterclaims by the estate against persons filing claims against the estate." 28 U.S.C. §157(b)(2)(c). The justices unanimously agreed that the tortious interference claim was in fact a core proceeding.

Bankruptcy courts are, however, courts created by Congress under Article I of the Constitution, and therefore lack the independence and protection of an Article III court. Accordingly, even though the bankruptcy court had statutory authority under 28 U.S.C. §157 to enter a final judgment on Anna Nicole's counterclaim, the Supreme Court held that the bankruptcy court lacked constitutional authority under Article III to enter a final judgment on a state law counterclaim that could not be resolved in the process of ruling on a creditor's proof of claim in the bankruptcy. Anna Nicole's tortious interference claim could not be resolved in the context of determining Pierce Marshall's defamation claim, and therefore, according to the Supreme Court, the bankruptcy court lacked authority to enter a final order on it.

The Supreme Court stressed in its 5-4 decision that *Stern v. Marshall* should be read narrowly. However, the decision leaves us to question the authority of bankruptcy courts, especially with regard to the state law fraudulent transfer claims that pop up repeatedly in bankruptcy cases. Many courts, including recently the Sixth and Ninth Circuits, have weighed in on *Stern*, making it clear to weary bankruptcy practitioners that the case's influence is alive and still evolving.

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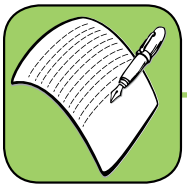

Government Contract Chat

Nicole Brakstad

Don't Stand So Close to Me: Affiliation and the Small Business Contractor (Part 2)

SBA's size regulations are an attempt to make sure that a small company is truly "small" and therefore deserving of the assistance provided to small business by the Government. Therefore, while relationships are important and beneficial, relationships with other businesses, leadership, and investors must be carefully examined before a government contractor may properly certify to the Government that they are, in fact, "small" within the applicable guidelines.

In Part 1 of this article, we discussed potential affiliation traps for the unwary with regard to current stock ownership.

In Part 2, we will examine other, even more common business relationships that can lead to an affiliation finding by SBA.

1. Affiliation based on future relationships.

SBA treats stock options, convertible securities, and agreements to merge as though the rights granted have been actually exercised. 13 C.F.R. § 121.103(d)(1). Regulations give present effect to an agreement to merge (including an agreement in principle) or to sell stock. Id. The opposite, however, is not true: SBA will not give present effect to the ability to divest all or part of an ownership interest in order to avoid a finding of affiliation. 13 C.F.R. § 121.103(d)(4).

2. Affiliation based on common management.

If one or more officers, directors, managing members, or general partners of a business controls the Board of Directors and/or the management of another business the businesses are affiliates. 13 C.F.R. § 121.103(e). SBA will also consider negative control by an owner or group of owners.

3. Affiliation based on identity of interest.

Individuals or firms that have identical (or substantially identical) business or economic interests may be treated as though they are affiliated unless they can demonstrate otherwise. 13 C.F.R. § 121.103(f). Family members, persons with common investments, or firms that are economically dependent through contractual (or other) relationships, are among those treated this way. While this presumption is rebuttable, a "clear line of fracture" is often difficult to evidence. SBA focuses on the substance of a relationship over its form, and therefore veiled attempts to disguise the true nature of the relationship may also lead to an identity of interest.

4. Affiliation based on contractual relationships and/or economic dependency.

A concern that is unlikely to be able to survive on its own or is economically dependent upon another concern will probably be found to be affiliated with the concern(s) on which it is dependent.

- *Newly Organized Concern.* Where former officers, directors, principal stockholders, and/or key employees of one concern organize a new concern in the same or a related industry or field operation, and serve as its officers, directors, principal stockholders, and/or key employees, and one concern is furnishing or will furnish the other concern with subcontracts, financial or technical assistance, and/or facilities, whether for a fee or otherwise, SBA will deem the newly organized company affiliated with the old company. 13 C.F.R. § 121.103(g).

- *Joint Ventures.* Joint Venturers are considered affiliated for the purpose of that contract. On certain large federal procurements, however, a joint venture comprised of only small businesses may qualify as a small business joint venture if certain rules are followed. See 13 CFR § 121.103(h).

- *Ostensible Subcontractor.* A contractor and its ostensible subcontractor are treated as joint venturers, and therefore affiliates, for size determination purposes. An ostensible subcontractor is a subcontractor that performs primary and vital requirements of a contract, or of an order under a multiple award schedule contract, or a subcontractor upon which the prime contractor is unusually reliant. In making this determination, SBA will consider all aspects of the relationship between the prime and subcontractor. 13 C.F.R. § 121.103(h)(4).

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Read Part 1, *Don't Stand So Close to Me: Affiliation and the Small Business Contractor* on page 8 of the Winter 2013 *Docket Call*.

First Day in Practice & Beyond

Meredith Brebner & Robert Dean

On March 1, 2013, the Virginia State Bar Young Lawyers Conference held its First Day in Practice & Beyond Seminar in Richmond, Virginia. This one-day program is offered to new lawyers and recently admitted members of the bar to gain helpful advice from judges and veteran attorneys before embarking on the practice of law in Virginia.

The conference was originally scheduled to coincide with last year's swearing-in ceremony following the July 2012 Bar Examination. Due to inclement weather from Hurricane Sandy, the program was rescheduled to this year. The attendees included new lawyers from across the Commonwealth. Nearly 100 (mostly) new lawyers attended this year's program at Richmond's Convention Center.

After introductions by Grayson Johnson, Chair of the Virginia State Bar General Practice Board of Governors, Brian Charville, President of the Virginia State Bar Young Lawyers Conference, and Travis Hill of the Virginia Bar Association Young Lawyers Division, the attendees broke out for lectures on topics including: bankruptcy law, family law, technology in law practice, criminal law, and a new topic for this year, contract drafting.

Seasoned attorneys offered practical advice on charging and collecting fees for legal work, avoiding the disciplinary system, and participating in discovery. The morning's speakers included Lynn Tavenner, Paula Beran, Sharon D. Nelson, John Simek, Michael Ewing, and Craig Cooley. In the afternoon, a panel of lawyers from the Virginia Trial Lawyers Association, including David Irvine, Brody Reid, Melanie Friend, and Melissa Ray, spoke about civil discovery. The Honorable Margaret P. Spencer gave a spirited talk on appellate advocacy and the Honorable Jacqueline F.W. Talevi moderated a panel discussion among Virginia judges on civility and courtroom etiquette to conclude the program.

The Virginia State Bar Young Lawyers Conference is pleased to welcome the new lawyers to the practice of law and to provide a comprehensive program for more experienced attorneys entering new areas of practice. Finally, they wish to thank the program's enthusiastic and dedicated speakers, who so graciously donated their time.

Meredith Brebner and **Robert Dean** are co-chairs of the First Day in Practice & Beyond Seminar committee. Ms. Brebner is an attorney with Hancock, Daniel, Johnson & Nagle, PC in Richmond and can be reached at mbrebner@hdjn.com. Mr. Dean is an attorney with Frith & Ellerman Law Firm, PC in Roanoke and can be reached at RDean@frithlawfirm.com.

Ask not what your community can do for you, give back instead.

Paula Bowen

As a Circuit Representative, the possibilities are endless to impact not only those in the legal profession but also the communities in which we live. Take for example, the Human Trafficking CLE held in Martinsville on February 5, 2013. There were 28 attendees.

Those in attendance first heard from Anthony Giorno, First Assistant United States Attorney for the Western District of Virginia. Mr. Giorno provided an hour of ethics training and also discussed federal trafficking statutes. He defined Human Trafficking as "compelling or coercing another person's labor, services or commercial sex acts or commercial sex act of a minor." Among the topics he covered were penalties for human trafficking, types of businesses that operate on forced labor, how to identify those who benefit financially from trafficking, using corroborating evidence to prove the crime, and combatting common defenses. One such defense was the "victim is better off" defense. Here, the pimp argues that trafficking was a step up from the victim's prior life of poverty or abuse.

The second speaker was Erin Kulpa, Assistant Attorney General and the Anti-Trafficking Coordinator for the Office of the Attorney General. Mrs. Kulpa discussed Virginia's criminal laws and civil and administrative remedies. As for civil remedies, a trafficker's vehicle can be forfeited, and a house or business can be shut down as a nuisance. These remedies exist to put a financial strain on the "$32 billion industry" of human trafficking. Sadly, this industry thrives on victimizing 12 million individuals globally. These victims are brought into the industry by kidnapping, fraud, and even by family members or friends. Removing these victims from the web of trafficking is extremely difficult. Once they are removed, services must be in place to help them transition from a life of slavery to a life of freedom.

Attorneys who attended the Human Trafficking CLE received 3.5 CLE hours, which included 1 hour of ethics. They also brought canned food items for local food banks. The attorneys were

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Ethics Corner

Emily F. Hedrick

When can a lawyer communicate with current or former employees of an organization when that organization is represented by counsel in the matter?

As a general proposition, Rule 4.2 prohibits a lawyer who is representing a client from communicating about the subject of the representation with any person that the lawyer knows to be represented by another lawyer in that matter. One of the most common difficulties in applying this rule is determining whether an employee of an organization is represented when the organization is represented by counsel.

In Virginia state courts, comment 7 to Rule 4.2 limits the application of the rule to members of the organization's "control group" or "alter ego." This group typically includes current officers and/or directors of an organization or other employees who have the authority to bind the corporation. Rule 4.2 does not bar contact with employees who are not part of the control group unless they are represented by their own counsel.

Federal courts in Virginia have applied a more restrictive test primarily based on the application of the Federal Rules of Evidence, barring communication with: (1) persons having managerial responsibility for the organization; (2) any other person whose act or omission in connection with the matter may be imputed to the organization for purposes of criminal or civil liability; or (3) any other person whose statement may constitute an admission on the part of the corporate party. *Armsey v. Medshares Mgt. Servs., Inc.*, 184 F.R.D. 569 (W.D. Va. 1998) (decided under former DR 7-103). At least one state court has interpreted the rule in the same way. *Dupont v. Winchester Med. Ctr., Inc.*, 34 Va. Cir. 105 (Winchester Cir. Ct. 1994).

State and federal courts generally agree that a lawyer may communicate with former employees of the organization, whether or not they were members of the control group during their employment. See *Bryant v. Yorktowne Cabinetry, Inc.*, 538 F. Supp. 2d 948 (W. D. Va 2008); Rule 4.2, Comment 7. However, if the former employee communicated with the organization's lawyer while he was employed with the organization, an opposing lawyer may not ask the employee to disclose confidential and/or privileged information from that conversation. LEO 1749.

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enthusiastic about having another CLE program next year hosted by the Young Lawyers. After the conclusion of the CLE, a local group of women expressed an interest in sending trafficking victims encouragement cards. The success of this CLE was due to the speakers' dynamic presentations, as well as the assistance of the Martinsville Commonwealth's Attorney's Office, the Young Lawyers Conference staff, and the young lawyers of Martinsville and Henry County.

For those who are interested in becoming a Circuit Representative, it is important to develop or join events that you are passionate about. The event is more likely to be a success. In preparing for an event, it is vital to solicit help from other young lawyers in the circuit. They will be eager to help. When not preparing for a special event, it is also important for the Circuit Representatives to organize social events for the young lawyers in their circuit. This provides time for feedback about prior and future events. It also enables young lawyers to get to know one another apart from the professional setting. Also during the year, you can collaborate with the senior attorneys on developing an event.

One of the greatest experiences of being a Circuit Representative is working with those in the Young Lawyers Conference. Their guidance and experience are invaluable. The leaders of the Young Lawyers Conference want you to be the best Representative you can for your circuit. The profession and community in which you live are awaiting the impact you alone can make.

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The VSB mobile member access app is available for free in the iTunes store.