

Comment from Senior Fellow Jonathan Rose on *Nonlawyer Assistance and Representation*  
December 5, 2024

Here are the Amendments that I would suggest. They are mainly structural.

Amendment 1: I would move **Availability of Nonlawyer Representation** and Nos. 3-12 to the beginning followed by **Availability of Nonlawyer Assistance** and current Nos. 1-2.

Amendment 2; In the Section on **Availability of Nonlawyer Assistance** I would reverse the order of Nos. 1 and 2.

Amendment 3: In the Section on **Qualifications of Nonlawyer Representatives** I would add the word “experience” to No. 4, line 99.

I also have some comments on **Qualifications of Nonlawyer Representatives**, No. 5, which I may make at the Plenary via my Zoom participation.