



INSTITUTE FOR JUSTICE

December 21, 2022

VIA ECF/CM AND U.S. FIRST-CLASS MAIL

Hon. Judge Paul A. Crotty
United States District Court
Southern District of New York
500 Pearl Street, Chambers 1350
New York, New York 10007

RE: *Upsolve, Inc., et al. v. James*, Case No. 1:22-cv-00627-PAC

Dear Judge Crotty:

Plaintiff Upsolve, Inc. gives notice to the Court that it has made updates to the American Justice Movement's (AJM) Training Guide to reflect changes or updates in the law. As the original Guide submitted to this Court noted, certain statutes of limitations were scheduled to change (but had not yet changed) when it was drafted. (*See* Document 1-2 at 9.) Those changed statutes of limitations are now in effect, and Upsolve has therefore produced a new version of its Training Guide making that and other small changes for the sake of accuracy. Upsolve continuously monitors for changes and improvements that it can make to the Training Guide, and it has accordingly made minor adjustments to provide superior and up-to-date advice to AJM clients.

Under the Court's preliminary injunction, Defendant is enjoined from "[e]nforcing the UPL rules against Plaintiffs or any Justice Advocate, to the extent Plaintiffs or Justice Advocates offer legal advice without a license to do so, to clients as contemplated in the AJM Training Manual." (Doc. 68 at 32.) Defendant is also enjoined from enforcing the UPL rules against "clients of the AJM program" or "the AJM program's legal advisors" for soliciting advice "as

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contemplated by the AJM Training Guide” or “for having assisted in creating the Training Guide.” (*Id.*) Given that the injunction specifically references the Training Guide, Upsolve submits this letter to apprise the Court of its most recent updates. None of these updates alter the nature or scope of the advice contemplated by the Training Guide and none of them require any modification of the preliminary injunction. Upsolve will continue to monitor for changes in the law and will update the Training Guide accordingly. Unless the Court prefers otherwise, however, Upsolve will not file notices for each future iteration of the Training Guide.

Dated this 21st day of December, 2022.

Respectfully submitted,

S/ Robert J. McNamara

Robert J. McNamara*

Brian A. Morris*

INSTITUTE FOR JUSTICE

901 N. Glebe Road, Suite 900

Arlington, Virginia 22203

Tel: (703) 682-9320

Email: rmcnamara@ij.org

bmorris@ij.org

Attorneys for Plaintiffs

**Admitted pro hac vice*

cc: Counsel for Defendants (via ECF/CM)