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June 2, 2015

Michigan Supreme Court
Clerk's Office
PO Box 30052
Lansing, MI 48909

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**Re: ADM File No. 2013-38; PROPOSALS TO AMEND THE MRPC 1.5;
Recent U.S. Supreme Court Case re State Bar Anti-trust Liability—
*N.C. State Bd. Of Dental Examiners v. FTC.***

To The Michigan Supreme Court:

This follows my earlier April 22, 2015 letter on this ADM File, in which cited *Goldfarb v Virginia State Bar*, 421 US 773, 95 SCt 2004, 44 LEd2d 572, 1975-1 Trade Cases P 60,355 (fee schedules set by State Bar, approved by state Supreme Court, violate the Sherman Act).

The U.S. Supreme Court has added to that legal principle in its decision in *N.C. State Board of Dental Examiners v. FTC* (USSC Case No. 13-534, 2/25/15) (copy attached), holding that the doctrine of state action immunity does not shield a state regulatory body from Sherman Act antitrust regulation and liability.

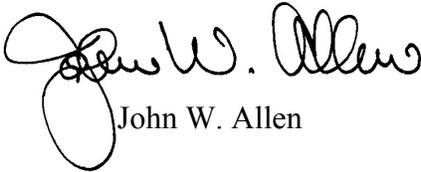
The *N.C. State Board* Case has already been recognized as a cause for concern to State Bars which attempt to restrict the terms of the marketplace affecting competition among their members. See attached *National Law Journal* article, 5/11/15.

This recent U.S. Supreme Court Case thus presents yet an additional reason why the ADM File No. 2013-38 proposals should be rejected.

Michigan Supreme Court
ADM 2013-38
June 2, 2015

God Bless America,

VARNUM

A handwritten signature in black ink, appearing to read "John W. Allen". The signature is fluid and cursive, with a large, prominent loop at the end of the name.

John W. Allen

Encl: *N.C. State Board Dentistry v FTC*, USSC No. 13-534
National Law Journal, 5/11/15