

June 30, 2020

Larry S. Royster  
Clerk of the Court  
Michigan Supreme Court  
P.O. Box 30052  
Lansing, MI 48909

**RE: ADM File No. 2019-31 – Proposed Amendment of Rule 7.216 of the Michigan Court Rules**

Dear Clerk Royster:

At its June 12, 2020 meeting, the Board of Commissioners of the State Bar of Michigan (Board) considered the above-referenced proposed rule amendment published for comment. In its review, the Board considered recommendations from the Civil Procedure & Courts Committee and the Criminal Jurisprudence & Practice Committee.

Based on this review, the Board voted unanimously to support the proposed rule amendments with additional amendments to Rule 7.216(C)(1)(a) to make it consistent with Rule 7.316(C)(1)(a): [additional amendments are shown in bolded underline and deletions are shown in strike-through].

the appeal was taken for purposes of hindrance or delay ~~or without any reasonable basis~~ **or is not reasonably well-grounded in fact or warranted by existing law or a good-faith argument for the extension, modification, or reversal of existing law;** ~~for belief that there was a meritorious issue to be determined on appeal; or~~

We thank the Court for the opportunity to comment on the proposed amendments.

Sincerely,



Janet K. Welch  
Executive Director

cc: Anne Boomer, Administrative Counsel, Michigan Supreme Court  
Dennis M. Barnes, President