



January 30, 2026

Elizabeth C. Kingston-Miller
Clerk of the Court
Michigan Supreme Court
P.O. Box 30052
Lansing, MI 48909

RE: ADM File No. 2022-31: Proposed Amendment of Rule 2.106 of the Michigan Court Rules

Dear Clerk Kingston-Miller:

The Board of Commissioners of the State Bar of Michigan considered ADM File No. 2022-31 at its meeting on January 23, 2026. In its review, the Board considered recommendations from the Access to Justice Policy Committee, Civil Procedure & Courts Committee, Criminal Law Section, and Probate & Estate Planning Section. The Board voted unanimously to support the proposed amendment of Rule 2.106. Adoption of the proposed amendment will provide greater clarity for both the bench and bar by aligning the language of Rule 2.106 with the provisions of MCL 691.1051.

Thank you for the opportunity to comment on the proposed amendment.

Sincerely,

A handwritten signature in black ink that reads "Peter Cunningham". The signature is fluid and cursive.

Peter Cunningham
Executive Director

cc: Sarah Roth, Administrative Counsel, Michigan Supreme Court
Lisa J. Hamameh, President

