



ADM2026-00693

Knoxville Bar Association
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June 23, 2026

By Email: appellatecourtclerk@tncourts.gov

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100 Supreme Court Building
401 Seventh Avenue North
Nashville, TN 37219-1407

Re: Order No. ADM-2026-00693, In re: Petition to Amend Supreme Court Rule 21

Dear Mr. Hivner:

The Knoxville Bar Association's Professionalism Committee carefully considered the petition by the Tennessee Commission on Continuing Legal Education to amend Rule 21 of the Rules of the Tennessee Supreme Court. The Committee presented a report with its recommendation on the proposed amendments at the June 16, 2026 meeting of the KBA Board of Governors. After consideration, the KBA Board submits the following comment on the proposed amendments.

The KBA does not oppose consolidating the sections of Rule 21 or shortening the compliance deadlines as requested by the petition. The KBA does oppose, however, including proposed Section 6.08, which changes computation rules. The default computation rules are well established under the Tennessee Rules of Civil and Criminal Procedure. Deviating from those rules would likely cause confusion.

The KBA also opposes the increase in the initial non-compliance fee, at least given the information submitted. Although the Petition states that the increase will "align [the rules] more closely with the administrative costs of processing and enforcement," it does not state what those costs are. Also, it appears that the administrative costs may decrease to some extent because, under the amendments, the Commission will no longer be required to send notice by registered or certified mail. One reason that a cost increase should be well-justified is that an attorney's

noncompliance with CLE requirements often arises from economic or family hardships.

As always, the KBA appreciates the invitation to consider and comment on proposed rules changes.

Sincerely,

A handwritten signature in black ink, appearing to read "Rachel P. Hurt". The signature is fluid and cursive, with the first name "Rachel" being the most prominent.

Rachel P. Hurt, President
Knoxville Bar Association

cc: Tasha Blakney, KBA Executive Director (via email)
Executive Committee of the Knoxville Bar Association