

**FAWL Will Participate in the 8/27/19 Oral Argument
on Pending Parental Leave Rule 2.570**

By: Wendy S. Loquasto, FAWL Historian¹

It is not often that the Florida Association for Women Lawyers (FAWL) gets to knowingly participate in history in the making, but that is precisely what FAWL is doing with the pending proposed rule on parental leave. FAWL Past President Jenny Shoaf Richardson will be presenting FAWL's Comments in support of proposed Florida Rule of Judicial Administration 2.570 at the oral argument to be held on August 27, 2019, at 9:00 A.M. at the Supreme Court of Florida. Please plan to attend or listen in live to the oral argument.

Proposed Rule 2.570 reads as follows:

RULE 2.570. PARENTAL-LEAVE CONTINUANCE

Unless substantial prejudice is demonstrated by another party, a motion for continuance based on the parental leave of a lead attorney in a case must be granted if made within a reasonable time after the later of:

- (a) the movant learning of the basis for the continuance; or
- (b) the setting of the proceeding for which the continuance is sought.

Three months is the presumptive maximum length of a parental leave continuance absent a showing of good cause that a longer time is appropriate. If the motion for continuance is challenged by another party that makes a prima facie demonstration of substantial prejudice, the burden shifts to the movant to demonstrate that the prejudice caused by denying the continuance exceeds the burden that would be caused to the objecting party if the continuance were to be granted. The court shall enter a written order setting forth its ruling on the motion and, if the court denies the requested continuance, the specific grounds for denial shall be set forth in the order.

Committee Notes

2018 Adoption. For purposes of this rule, “parental-leave continuance” means a continuance sought in connection with the birth or adoption of a child by the movant. The Florida Supreme Court and The Florida Bar are committed to the concept of parental leave and to the importance of an appropriate work/life balance. This rule provides a strong presumption that a continuance for parental leave, generally not exceeding three months, will be granted when the request for relief is made within a reasonable time after the basis for continuance is reasonably discernible. However, a continuance or stay may be denied in the sound discretion of the court where there would be substantial prejudice to another party, where an emergency or time-sensitive matter would be unreasonably delayed, where a significant number of continuances have already been granted, or where the substantial rights of the parties may otherwise be adversely affected.

The entire case docket for proposed Rule 2.570 can be viewed on the Florida Supreme Court’s on-line docket: *In Re: Amendments to the Florida Rules of Judicial Administration - Parental Leave*, Case No. SC18-1554, <http://onlinedocketssc.flcourts.org/DocketResults/CaseByYear?CaseNumber=1554&CaseYear=2018>.

Historical Background for Rule 2.570

By way of historical background, a proposal for a parental leave rule was first proposed in December 2015 by Craig Leen, a member of the Rules of Judicial Administration Committee (RJAC), who voiced concern after hearing of three instances when a continuance based on pregnancy was denied. Mr. Leen voiced additional concerns that attorneys having children should not have to suffer negative consequences for choosing to have a family – female attorneys should not have to give up their careers or cases for a given period of time and male attorneys should not suffer a stigma for choosing to spend time as a parent. Additionally, clients should not lose their attorney when that attorney has a child.²

Mandatory and discretionary versions of the rule (then designated as 2.565) were proposed, which provided for granting a reasonable time for a continuance based upon parental leave absent exceptional reasons for denial or substantial

prejudice to the opposing party.³ When the RJAC considered the proposed rule in June 2016, there was unanimous agreement that parental leave is always good cause for a continuance and that a motion for continuance based on parental leave should only be denied if there is substantial countervailing harm to the other party. However, the RJAC voted not to pursue the rule as a number of the members believed the issue should be addressed by policy, rather than rule.⁴ Ultimately, the rule was defeated by a 5-25 vote by the RJAC. The concern voiced by the majority was that the rule would “hamstring judges.”⁵

While the proposed rule was still pending before the RJAC, it was also considered by The Florida Bar Diversity and Inclusion Committee, which unanimously adopted a resolution in March 2016 in support of the mandatory version of the rule.⁶

After the negative vote by the RJAC, and in light of support by the Diversity and Inclusion Committee, The Florida Bar Board of Governors created a Special Committee on Parental Leave from Court Actions. After extensive discussion the special committee voted 6-4 to approve a new discretionary Rule 2.570 on parental leave. This proposed rule was submitted to The Florida Bar Board of Governors, which voted unanimously to support the rule.⁷

On August 31, 2017, an Out-of-Cycle Report of The Florida Bar Board of Governors was filed as *In re: Florida Rule of Judicial Administration 2.570*, Case No. SC17-1611, and it proposed discretionary Rule 2.570, creating a presumption for continuances of three months for parental leave of the lead attorney absent a showing of substantial prejudice of the opposing party.⁸

When the Board of Governors’ report was considered by Supreme Court of Florida, it determined that the Board did not have authority to propose new Rule 2.570. The Court relied on Florida Rule of Judicial Administration 2.140, which provides the procedures to amend rules of practice and procedure, and it limits the entities authorized to propose procedural rules to the rules committees. As a result, the report was dismissed as unauthorized.⁹

Current “No Action Report” Rule Case

After its decision, the Supreme Court of Florida then directed RJAC to provide a parental-leave continuance rule for the Court’s consideration.¹⁰ The

RJAC considered proposed Rule 2.570 at its June 19, 2018, meeting where it was debated for hours, but the proposal ultimately failed by a 15-23-1 vote.¹¹ The Board of Governors once again considered and debated the rule on July 27, 2018, voting unanimously in favor except for one abstention. On September 14, 2018, the RJAC filed a “No Action Report,” which explains that because the committee voted not to support the adoption of the proposed rule, it was filing a no action report instead of a petition.¹² The Court construed the “No Action Report” as a proper out-of-cycle report filed at its request.¹³ The Court then solicited comments to proposed Rule 2.570 via publication in October 15, 2018, edition of *The Florida Bar News*.¹⁴ FAWL, Broward County Women Lawyers Association, and the Palm Beach County Chapter of the FAWL were among those who filed Comments.¹⁵

Majority View

The RJAC’s No Action Report makes clear that everyone is supportive of family leave and it recognizes the importance of parental-leave continuances. Nevertheless, the majority view expressed concern that the proposed rule would strip courts of too much of the discretion needed to properly manage cases and address all the competing interests involved in a case.¹⁶ They contend that the Court should avoid adopting rules that advance broad and over-arching public policies at the expense of undermining or impairing the judicial discretion needed to fairly and properly manage individual cases.

Proposed Rule 2.570 would apply only when continuances are based on a need for parental leave, a reason that is but one of many that can justify a continuance and a reason appropriate for a small, select professional population. The rule gives automatic priority to this single factor, which can only be outweighed by a demonstration of substantial prejudice by the non-movant. While a lawyer’s need for parental leave should never be dismissed or ignored, the committee believes that it should not be enshrined in its own rule, which may cause a court to disregard other valid considerations that impact and are impacted by a continuance.[¹⁷]

The majority notes that continuances are already addressed to the sound discretion of the trial judge, and Florida Rule of Judicial Administration 2.545 establishes the policy of the court system with respect to continuances, stating that they “should be few, good cause should be required, and all requests should be

heard and resolved by a judge.’’¹⁸ ‘‘Judges and lawyers have a professional obligation to conclude litigation as soon as it is reasonably and justly possible to do so.’’¹⁹

The majority states that an attempted balancing of the rights and responsibilities between the employer and employee-attorney who seeks parental leave is not the subject of the proposed rule. Rather that resolution is a private matter that should be reached within the employment relationship.²⁰ It continues that proposed Rule 2.570 is far more than a presumptive continuance rule, but is actually a stay of proceedings for a presumptive three-month period.²¹

The majority view expressed confidence that debate about proposed Rule 2.570 had already provided sufficient education to ensure that judicial discretion will be exercised appropriately when parental-leave continuances are requested:

To the extent that there may be some members of Florida’s judiciary who in the past were not properly cognizant of the value that ought to be given parental leave, the committee respectfully suggests that the almost three-year debate about the adoption of some form of a parental-leave continuance rule in Florida has succeeded in elevating the discussion to a point where few judges, if any, will now ignore the issue. The very widely publicized robust debate over the issue has sensitized both practitioners and the judiciary. And while the committee supports action by the Court in its supervisory capacity to further educate and sensitize the members of the judiciary to the parental leave issue, the committee does not believe that the proposed Rule 2.570 is either the proper or best vehicle to achieve that laudable goal. In this area, as in most such areas that require the exercise of sound judicial discretion, it is the firm and definite belief of the committee that ‘‘less is more.’’ [22]

Minority View

The minority view recognizes the realities of the gender gap in the legal profession:

The minority supported adoption of the proposed Rule 2.570 because it believed a parental-leave continuance rule would provide

more predictability in the courts' treatment of parental leave, reduce obstacles to career advancement faced by women who bear children, encourage male use of parental leave, and help alleviate the stigma of the "mommy track," all of which would help close the workplace gender gap in the legal profession. In reporting its position in support of the adoption of Rule 2.570, the minority analyzed the existing rules and case law addressing continuances and how they impact the consideration of parental-leave continuances, as well as laws and policies concerning parental leave. [23]

The minority view notes that the two rules currently governing continuances, Florida Rule of Judicial Administration 2.545(e) and Florida Rule of Civil Procedure 1.460, discourage courts from granting continuances, yet create a discretionary standard for courts. Factors the courts should consider in ruling on motions for continuance include (1) whether denial of the continuance creates an injustice for the movant, (2) whether the cause for the request for continuance was unforeseeable and not the result of dilatory practices, and (3) whether the opposing party will suffer any prejudice or inconvenience as a result of the continuance. Other factors the minority believes should be considered include (4) the length of the requested continuance, (5) whether counsel has other associates who can adequately prepare to try a case, (6) whether other continuances have been requested and granted, (7) inconvenience to all involved in the trial, and (8) other unique circumstances.²⁴

The minority view recognizes that a central concern has been "if it ain't broke, don't fix it," but it offers specific instances demonstrating that the system "is broke," such as when continuances requested for parental leave are denied resulting in harm to the attorneys, their families, and their clients.

For instance, Jane West filed a Comment recounting how she and her law partner both happened to be pregnant at the same time and due within three weeks of each other. Two women attorneys against eight male lawyers who set 22 back-to-back depositions in one month, just three weeks before Ms. West's son was born. When the women dared to ask for a continuance of the upcoming trial, they were met with a motion to expedite the trial and a motion to disqualify their law firm from the case, which cited a case in which a lawyer was disqualified on the basis of her diminished mental competency. In the end, the women lawyers were successful at trial and Jane West uses this experience as a "teach-able" moment in

public speaking engagements.²⁵

Tara Scott Lynn, a solo practitioner, filed a Comment recounting that while the judges in her own circuit generally accommodated her requests for continuances and extensions made during a difficult pregnancy, a judge outside her circuit required her to draft a document within five days, and when she explained she was undergoing a Cesarean section that weekend and would not be able to comply with the deadline, the judge gave her only ten days. Again, while Ms. Lynn complied with that deadline, she stated it was the last thing that should have been on her mind during this crucial time.²⁶

The minority also demonstrated how current law, such as the Family and Medical Leave Act, may not cover attorneys needing parental-leave continuances, and that the practice of law is a unique area in which attorneys may have permission to take leave from their employers, but not from the courts.²⁷ It also notes the unique set of circumstances in the practice of law, which relies heavily on client service and caseload, and forces attorneys to seek substitute counsel due to parental leave, which places them at a professional disadvantage that can hinder their careers. “Workers face tensions when trying to balance their roles as professionals and parents, especially when there are adverse professional consequences to prioritizing family over work.”²⁸

FAWL & FAWL Chapter Comments

FAWL’s Comments maintain that the proposed rule is necessary based on increasing awareness of denials of requests for continuance for parental leave and, more frequently, excessive opposition to these requests.

Continuances are routinely granted without opposition for weddings, planned surgical procedures, football games, and Broadway shows. Yet, when months of advance notice of a need for continuance is presented by parents who are also trial lawyers, there seems to be a pattern of opposition and doubt as to the legitimacy of the request. As this Court knows, there is very limited ability to appeal the denial of a request for continuance and that ability is further limited where the order denying the continuance contains no findings, which is commonplace under the current rules. [²⁹]

FAWL's Comments supply evidence to dispel the myth that opposition to these requests for continuance is not common by offering numerous examples of denials of continuances and opposition to such requests at both the trial and appellate levels.³⁰ The Comments conclude:

Parents should not have to forego lead counsel opportunities or lose their clients in the absence of substantial prejudice. Lawyer spouses should not be unnecessarily put under undo stress or concern that their significant other could miss the birth of their children in the absence of substantial prejudice. Clients should not have to pay for a new attorney to learn their case on the eve of trial—to the extent that is even possible—in the absence of substantial prejudice. Proposed Rule 2.570 would not change the Rule of Civil Procedure that requires clients to consent to requests for continuance. Newborn children should not be deprived of essential development in the first three months after birth in the absence of substantial prejudice.

* * *

The Court has plentiful materials from parents who have experienced disappointing opposition to and denial of their requests for continuance of trial. Results that are unpredictable and arbitrary cannot be just. FAWL would submit that all of the parents who are lawyers in Florida, as well as the judges and opposing counsel would benefit from written guidance from the Court on professionalism in responding to motions for continuance sought due to parental leave.

Women are vastly underrepresented in first chair roles in civil trials. Being deprived of these critical trial opportunities likely contributes to underrepresentation of women in partnership of law firms and even board certification, which frequently has a trial requirement. Adoption of the proposed Rule will not cure gender bias in the legal profession or solve gender equality, but it is a tangible step in the right direction. [31]

The Palm Beach Chapter of FAWL offered these additional Comments:

In the case of a lead attorney who is on parental leave, these

conflicts range from nursing and establishing a sleep pattern with a newborn to creating a bond between child and parent during some of the most formative months of the child's early life. The importance of this time period is emphasized in the federally enacted Family Medical Leave Act (FMLA) which, for 25 years, has recognized the need to "promote work-life balance" and "help workers balance the demands of the workplace with the needs of their families and their own health." In accordance with these principles, federal law requires qualifying employers to provide 12 weeks of protected leave to an employee for "the birth of a child and to bond with the newborn child."

In the absence of the courts' and litigants' recognition of these principles—by adopting proposed Rule 2.570 to provide for a brief trial continuance during parental leave—such protections are rendered meaningless. Despite being on leave, attorney-parents would be asked to balance one of the most significant—and, arguably, the most stressful—changes in their family lives with the additional burden of preparing for and attending trial (including time-consuming meetings with clients, preparation of witnesses, exhibits and demonstrative aids, and preparation of the attorney's opening statement, witness examination, closing arguments, and trial-related motions).[³²]

The Broward County Chapter echoed the concerns:

We have many stories among us that demonstrate the need for firm rules to be in place to mandate that all counsel, regardless of gender, who strive for excellence in the law but also excellence in parenting be protected. Failure to pass these rules would harm many who are trying to balance parenthood with lawyering, but skewed mostly against those lawyers who happen to be female.

We know this Court has been striving valiantly to enforce professionalism between counsel. Unfortunately, despite this Court's best efforts to discipline those attorneys who don't always perform their duties fairly and professionally, we will always have those who will attempt to use opposing counsel's responsibilities as parents against them to unfair advantage. The Parental Leave Rules will go a

long way in combatting these types of unprofessional efforts.[³³]

Although the upcoming August 27 oral argument might not qualify as a hotbed of controversy and excitement, proposed Rule 2.570 is important, not only for women, for the personal lives and parenting roles of all attorneys. Tune in and see what happens.

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1. Wendy Loquasto is a former FAWL President (2006-07), former President of Tallahassee Women Lawyers (1996-97), and past Chair of the Appellate Court Rules Committee (2014-15). She is President of Fox & Loquasto, LLC, a general appellate practice firm in Tallahassee, Florida, and is board-certified in appellate practice.
 2. See Out-of-Cycle Report of The Florida Bar Board of Governors filed Aug. 31, 2017 (listed on the docket as “Petition–Amendment to Rules (Judicial)”), pp. 2-3, *In re: Amdmts. Fla. R. Jud. Admin. - New Rule 2.570*, No. SC17-1611 (Fla. 2017), <http://onlinedocketssc.flcourts.org/DocketResults/CaseDocket?Searchtype=Case+Number&CaseYear=2017&CaseNumber=1611>.

3. **Mandatory version**

RULE 2.565 PARENTAL LEAVE

A motion for continuance based on parental leave of the attorney, when consistent with the parental leave policy of the firm or governmental entity for which the attorney works, or for a reasonable time when the attorney is a solo practitioner, shall be granted unless exceptional circumstances are shown. If the court denies the continuance, the specific grounds for denial shall be stated in the order, and the court shall exercise its discretion to grant as much leave as would be reasonable under the circumstances.

Discretionary version

RULE 2.565 PARENTAL LEAVE

In considering a motion for continuance based on parental leave of an attorney for a party, when the requested amount of time is consistent with the parental leave policy of the firm or governmental entity for which the attorney works, or for an otherwise reasonable amount of time when the attorney is a solo practitioner, the court should exercise its discretion to grant the requested continuance unless the opposing party would be substantially prejudiced. In such circumstances, the court should exercise its discretion to grant as much leave as would be reasonable without causing substantial prejudice to the opposing party.

See Appendix E filed Aug. 31, 2017, pp. 5-6, Report of Subcommittee A dated May 17, 2016, *In re: Amdmts. Fla. R. Jud. Admin. - New Rule 2.570*, No. SC17-1611 (Fla. 2017), <http://onlinedocketssc.flcourts.org/DocketResults/CaseDocket?Searchtype=Case+Number&CaseYear=2017&CaseNumber=1611>.

4. See Appendix E filed Aug. 31, 2017, p. 2, Letter from Amy Singer Borman, Chair, Rules of Judicial Administration, to Chief Justice Jorge Labarga and other judicial agencies dated June 30, 2016, *In re: Amdmts. Fla. R. Jud. Admin. - New Rule 2.570*, No. SC17-1611 (Fla. 2017),

<http://onlinedocketssc.flcourts.org/DocketResults/CaseDocket?Searchtype=Case+Number&CaseYear=2017&CaseNumber=1611>.

5. See Out-of-Cycle Report of The Florida Bar Board of Governors filed Aug. 31, 2017, p. 3, *In re: Amdmts. Fla. R. Jud. Admin. - New Rule 2.570*, No. SC17-1611 (Fla. 2017), <http://onlinedocketssc.flcourts.org/DocketResults/CaseDocket?Searchtype=Case+Number&CaseYear=2017&CaseNumber=1611>.

6. See Appendix E filed Aug. 17, 2017, pp. 14-15, A Resolution of The Florida Bar Diversity and Inclusion Committee in Support of the Mandatory Version of Proposed Rule 2.565, Parental Leave, *In re: Amdmts. Fla. R. Jud. Admin. - New Rule 2.570*, No. SC17-1611 (Fla. 2017), <http://onlinedocketssc.flcourts.org/DocketResults/CaseDocket?Searchtype=Case+Number&CaseYear=2017&CaseNumber=1611>.

7. See Out-of-Cycle Report of The Florida Bar Board of Governors filed Aug. 31, 2017, pp. 3-4, *In re: Amdmts. Fla. R. Jud. Admin. - New Rule 2.570*, No. SC17-1611 (Fla. 2017), <http://onlinedocketssc.flcourts.org/DocketResults/CaseDocket?Searchtype=Case+Number&CaseYear=2017&CaseNumber=1611>.

8. **RULE 2.570. PARENTAL LEAVE**

A motion for continuance based on parental leave of the lead attorney in the case must be granted if made within a reasonable time after learning the basis for the continuance unless substantial prejudice to the opposing party is shown. Three months is the presumptive length of a continuance granted for parental leave absent good cause for a longer time. If the court denies the requested continuance, the court must state on the record the specific grounds for denial. If the motion for continuance is challenged by an opposing party proffering a basis for a claim of substantial prejudice, the attorney seeking the continuance has the burden of demonstrating the lack of substantial prejudice to the opposing party.

See Out-of-Cycle Report of The Florida Bar Board of Governors filed Aug. 31, 2017, pp. 2-3, *In re: Amdmts. Fla. R. Jud. Admin. - New Rule 2.570*, No. SC17-1611 (Fla. 2017), <http://onlinedocketssc.flcourts.org/DocketResults/CaseDocket?Searchtype=Case+Number&CaseYear=2017&CaseNumber=1611>.

9. See *In re: Fla. R. Jud. Admin. 2.570*, __ So. 3d __, 2018 WL 472769 (Fla. Jan. 18, 2018).

10. See Letter to John Tomasino from Eduardo I. Sanchez, Chair, Rules of Judicial Administration Committee (listed on the docket as “Petition–Amendment to Rules (Judicial)”) (hereinafter “No Action Report”) filed Sept. 14, 2018, pp. 12-13, *In Re: Amdmts. Fla. R. Jud. Admin. - Parental Leave*, No. SC18-1554 (Fla. 2018), <http://onlinedocketssc.flcourts.org/DocketResults/CaseByYear?CaseNumber=1554&CaseYear=2018>.

11. See No Action Report filed Sept. 14, 2018, p. 2, *In Re: Amdmts. Fla. R. Jud. Admin. - Parental Leave*, No. SC18-1554 (Fla. 2018), <http://onlinedocketssc.flcourts.org/DocketResults/CaseByYear?CaseNumber=1554&CaseYear=2018>.

12. See No Action Report filed Sept. 14, 2018, p. 2, *In re: Amdmts. Fla. R. Jud. Admin. – Parental Leave*, No. SC18-1554 (Fla. 2018), <http://onlinedocketssc.flcourts.org/DocketResults/CaseByYear?CaseNumber=1554&CaseYear=2018>.

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13. See Order filed Sept. 17, 2018, *In re: Amdmts. Fla. R. Jud. Admin. – Parental Leave*, No. SC18-1554 (Fla. 2018),
<http://onlinedocketssc.flcourts.org/DocketResults/CaseByYear?CaseNumber=1554&CaseYear=2018>.
 14. See Letter to The Florida Bar News Editor from John A. Tomasino filed Sept. 20, 2018, *In Re: Amdmts. Fla. R. Jud. Admin. - Parental Leave*, No. SC18-1554 (Fla. 2018),
<http://onlinedocketssc.flcourts.org/DocketResults/CaseByYear?CaseNumber=1554&CaseYear=2018>.
 15. See Comments by Board of Directors of the Broward County Women Lawyers Association, Palm Beach County Chapter of the Florida Association for Women Lawyers, and Florida Association for Women Lawyers filed Nov. 15, 2018, *In Re: Amdmts. Fla. R. Jud. Admin. - Parental Leave*, No. SC18-1554 (Fla. 2018),
<http://onlinedocketssc.flcourts.org/DocketResults/CaseByYear?CaseNumber=1554&CaseYear=2018>.
 16. See No Action Report filed Sept. 14, 2018, p. 3, *In Re: Amdmts. Fla. R. Jud. Admin. - Parental Leave*, No. SC18-1554 (Fla. 2018),
<http://onlinedocketssc.flcourts.org/DocketResults/CaseByYear?CaseNumber=1554&CaseYear=2018>.
 17. *Id.* at 3-4.
 18. *Id.* at 4 (quoting Fla. R. Jud. Admin. 2.545(e)).
 19. *Id.* at 4 (quoting Fla. R. Jud. Admin. 2.545(a)).
 20. *Id.* at 4-5.
 21. *Id.* at 5.
 22. *Id.* at 5-6.
 23. *Id.* at 6.
 24. *Id.* at 6-7.
 25. See Comments by Jane West filed Nov. 14, 2018, *In Re: Amdmts. Fla. R. Jud. Admin. - Parental Leave*, No. SC18-1554 (Fla. 2018),
<http://onlinedocketssc.flcourts.org/DocketResults/CaseByYear?CaseNumber=1554&CaseYear=2018>.
 26. See Comments by Tara Scott Lynn filed Nov. 14, 2018, *In Re: Amdmts. Fla. R. Jud. Admin. - Parental Leave*, No. SC18-1554 (Fla. 2018),
<http://onlinedocketssc.flcourts.org/DocketResults/CaseByYear?CaseNumber=1554&CaseYear=2018>.
 27. See No Action Report filed Sept. 14, 2018, p. 8, *In Re: Amdmts. Fla. R. Jud. Admin. - Parental Leave*, No. SC18-1554 (Fla. 2018),
<http://onlinedocketssc.flcourts.org/DocketResults/CaseByYear?CaseNumber=1554&CaseYear=2018>.
 28. *Id.* at 9.
 29. Comments by the Florida Association for Women Lawyers filed Nov. 15, 2018, p. 1, *In Re: Amdmts. Fla. R. Jud. Admin. - Parental Leave*, No. SC18-1554 (Fla. 2018),
<http://onlinedocketssc.flcourts.org/DocketResults/CaseByYear?CaseNumber=1554&CaseYear=2018>.
 30. *Id.* at 2-3.

31. *Id.* at 3-4 (footnote omitted).

32. Comments by Palm Beach County Chapter of Florida Association for Women Lawyers filed Nov. 15, 2018, pp. 2-3 (citations omitted), *In Re: Amdmts. Fla. R. Jud. Admin. - Parental Leave*, No. SC18-1554 (Fla. 2018),

<http://onlinedocketssc.flcourts.org/DocketResults/CaseByYear?CaseNumber=1554&CaseYear=2018>.

33. Comments by Board of Directors of the Broward County Women Lawyers Association filed Nov. 15, 2018, p. 1, *In Re: Amdmts. Fla. R. Jud. Admin. - Parental Leave*, No. SC18-1554 (Fla. 2018),

<http://onlinedocketssc.flcourts.org/DocketResults/CaseByYear?CaseNumber=1554&CaseYear=2018>.