

November 20, 1975

Dear :

This is in response to your inquiry whether the EBS-1 form is a legal document that can be prepared by an external adviser only if the external adviser is a lawyer. I regret that because of shortages in staff we were not able to reply earlier to your letter.

It was not our intention when designing the original EBS-1 form to develop a document that would be deemed a legal document in the sense you describe. This would be even more true of the first two pages of the EBS-1 form which was required to be filed on August 15 and of the simplified EBS-1 form which was published in proposed form on October 10. (A copy enclosed).

It is our understanding that the [State] Bar Association has made no assertion that the EBS-1 must be filled out by lawyers only. We would be very surprised if it were to do so, and would certainly want to take issue with the Bar Association were this to happen.

Sincerely,