

SUPREME COURT OF PENNSYLVANIA

In the Matter of: Meagan Hart

No. 14 WM 2025 · No. 14 WM 2025 · Decided May 27, 2025

SUMMARY

Justice Dougherty issues a concurring statement regarding the Pennsylvania Supreme Court's grant of extensions of limited licenses under Pennsylvania Bar Admission Rule 311(g) to Meagan Hart and another applicant. The statement maintains that the applicants did not demonstrate the required good cause but should receive relief because they lacked fair notice of the Court's newly clarified, stricter enforcement of the rule. It cautions that future applicants must explain why they were unable to obtain Pennsylvania bar admission within the rule's 30-month period.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                                         |
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| COURT                 | Supreme Court of Pennsylvania                                                                                                                                                                                                                                                                                                                           |
| WRITING FOR THE COURT | Justice Dougherty                                                                                                                                                                                                                                                                                                                                       |
| JURISDICTION          | Supreme Court of Pennsylvania                                                                                                                                                                                                                                                                                                                           |
| DECIDED               | May 27, 2025                                                                                                                                                                                                                                                                                                                                            |
| DOCKET                | 14 WM 2025                                                                                                                                                                                                                                                                                                                                              |
| DISPOSITION           | other                                                                                                                                                                                                                                                                                                                                                   |
| PROCEDURAL POSTURE    | The Supreme Court of Pennsylvania granted Meagan Hart's request for an extension of her limited license to practice under Pennsylvania Bar Admission Rule 311(g). Justice Dougherty joined the Court's order in a concurring statement explaining why Hart should receive relief despite failing to make the concurrence's required good-cause showing. |
| PRECEDENTIAL VALUE    | Nonbinding concurring statement                                                                                                                                                                                                                                                                                                                         |

TOPICS

- appellate procedure
- statutory interpretation
- legislative intent

PRACTICE AREAS

- legal ethics and professional responsibility
- bar admission and licensing
- appellate procedure

QUESTIONS PRESENTED

1. Whether an applicant for an extension of a limited license under Pennsylvania Bar Admission Rule 311(g) must specify why the applicant was unable to obtain admission to the Pennsylvania bar in the ordinary course within the rule's thirty-month period.
2. Whether an applicant who filed an extension request before receiving fair notice of the Court's stricter enforcement of Rule 311(g) should be granted relief despite failing to make that showing.

#### KEY QUOTATIONS

*“The ‘good cause shown’ language in Rule 311(g) necessarily requires ‘an applicant [to] specify why the attorney was unable to obtain admission to the Pennsylvania bar in the normal course within the thirty months afforded by Rule 311.’” (at 1)*

*“To be perfectly clear, however, as I see it, once this matter is published, future applicants will finally be ‘on fair notice that this Court has course-corrected and intends to enforce Rule 311(g)’s ‘good cause shown’ requirement.”” (at 2)*

#### FACTUAL BACKGROUND

Hart was an out-of-state attorney working for an organization providing legal assistance in Pennsylvania and held a limited license under Pennsylvania Bar Admission Rule 311. Her limited license was approaching its thirty-month expiration, and she filed an extension request nearly one month before Justice Dougherty issued the concurring statement in *In re Taylor de Laveaga*. The concurrence stated that Hart had not shown why she was unable to obtain regular Pennsylvania admission within the thirty months allowed by Rule 311, but concluded that she should not bear the consequences of the Court's newly announced, more rigorous enforcement approach.

#### PROCEDURAL HISTORY

Hart sought an extension of a limited Pennsylvania law license issued under Rule 311. The Court granted the extension. Justice Dougherty concurred because Hart filed her request before the Court announced a more rigorous enforcement approach to Rule 311(g), and therefore was not on fair notice of that change.

#### DISPOSITION

other

#### CASES CITED

- *In the Matter of: Taylor de Laveaga*, 5 WM 2025 (Pa. Mar. 17, 2025)
- *In the Matter of: Rieko Shepherd*, 24 WM 2025

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