

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

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

OPINION

In the Matter of: Meagan Hart

PER CURIAM.

IN THE SUPREME COURT OF PENNSYLVANIA
WESTERN DISTRICT

IN THE MATTER OF: MEAGAN HART, : No. 14 WM 2025

ESQUIRE MOTION FOR EXTENSION : PURSUANT TO RULE 311(G) :

CONCURRING STATEMENT

JUSTICE DOUGHERTY

As I recently explained, “[f]or too long, this Court has been too lax in its treatment of requests by out-of-state attorneys for extensions of limited licenses issued under Pennsylvania Bar Admission Rule 311.1 The Rule’s mandate is clear: ‘Admission to practice under this rule shall expire after 30 months, unless the Court for good cause shown shall extend such period in an individual case.’ Pa.B.A.R. 311(g) (emphasis added).” In the Matter of: Taylor de Laveaga, 5 WM 2025, at 1 (Pa. Mar. 17, 2025) (Dougherty, J., concurring statement). 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.” Id. (internal quotations and citation omitted). Having provided that long-overdue clarification, which was endorsed by a majority of the Court,² I cautioned future applicants that, “moving forward, [they] are now on fair 1 See Pa.B.A.R. 311(a) (authorizing limited license for admission to practice law for “an attorney who is not a member of the bar of this Commonwealth but is qualified to practice in the courts of another state and who is employed by or associated with an organized legal services program in this Commonwealth providing legal assistance to indigents in civil matters or a public defender’s office or defender association in this Commonwealth providing legal assistance to indigents in criminal matters”). 2 Justices Mundy and Brobson joined my concurring statement, which adopted Justice Wecht’s position that “[a] ‘good cause’ showing . . . must specify why the attorney was (continued...) notice that this Court has course-corrected and intends to enforce Rule 311(g)’s ‘good cause shown’ requirement. Future failures to demonstrate ‘good cause’ will not be excused based on this Court’s past practice.” Id. at 2. Today the Court grants extensions of limited licenses to applicants Hart and Shepherd, see In the Matter of: Rieko Shepherd, 24 WM 2025, even though both utterly failed to show good cause. I join the Court’s orders for two idiosyncratic reasons. First, applicant Hart filed her extension request nearly one month before I issued my concurring statement in de Laveaga. Thus, although she is employed by the same organization as applicant de Laveaga and presumably learned about it later, she was not “on fair notice” of our course correction at the time she filed her application. Second, although applicant Shepherd filed her application nine days after we granted reconsideration in de Laveaga, it appears that decision has yet to be officially published. Moreover, she does not share the same employer as applicants de Laveaga and Hart. Given these circumstances, “I do not believe th[ese] individual applicant[s] should bear the consequences of this Court’s abrupt shift to more rigorous enforcement of Rule 311.” Id. 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.” Id. This means that to obtain relief, an applicant from that date forward must specify why he or she was unable to obtain

admission to the Pennsylvania bar in the normal course within the thirty months afforded unable to obtain admission to the Pennsylvania bar in the normal course within the thirty months afforded by Rule 311.” In the Matter of: Taylor de Laveaga, 5 WM 2025, at 1-2 (Pa. Mar. 17, 2025) (Wecht, J., dissenting statement); see id. at 1 (“a subsequent ‘good cause’ showing for extension cannot merely repeat the previously-made averment that this is the public interest work the attorney is doing”). [14 WM 2025] - 2 by Rule 311.3 Failure to meet this standard “will not be excused based on this Court’s past practice.” Id. (emphasis added). Justices Donohue, Mundy, Brobson and McCaffery join this concurring statement. 3 I recognize there may be others whose temporary licenses are set to expire between the period when this decision issues and the results of the next available Pennsylvania Bar Exam (in February 2026) become available. In my view, any such applicants would be similarly situated to the present applicants and thus entitled to similar relief. [14 WM 2025] - 3