



AVVO, INC.  
720 Olive Way  
Suite 1400  
Seattle, WA 98101

June 6, 2018

Joshua Walthall  
Deputy Counsel  
North Carolina State Bar, Authorized Practice Committee  
217 E. Edenton Street  
P.O. Box 25908  
Raleigh, NC 27611

**Re: Committee Inquiry re Avvo and the Unauthorized Practice of Law**

Dear Mr. Walthall:

I am General Counsel of Internet Brands, a company that recently acquired Avvo as part of the growing Internet Brands family. We understand and appreciate that you have had ongoing conversations with Avvo regarding Avvo's "Legal Services" product, and the Authorized Practice Committee of the North Carolina State Bar's inquiry into that product. I have reviewed your letter of March 16, 2018 posing questions about Avvo's Legal Services as it relates to the unauthorized practice of law, and would like to update you on developments relevant to that inquiry.

At Internet Brands, we are focused on our users, and making sure we provide them with accurate, and consumer-friendly information to help them navigate the difficult tasks of identifying and hiring lawyers. As part of our acquisition of Avvo, we have evaluated the Avvo product offerings, and adjusted the Avvo product roadmap to align more comprehensively with our business and focus. Accordingly, we have decided to discontinue Avvo Legal Services. The discontinuation began this month, with completion expected by the end of July.

I would like to note that although we are discontinuing the Legal Services product, we share Avvo's view that providing consumers a marketplace for the provision of legal services in the manner that Avvo has done does not implicate rules regarding the unauthorized practice of law. The services Avvo has offered are non-legal services, and were developed with the purpose of connecting clients with lawyers, and facilitating the transaction in a way that was simple and

comfortable for both. The legal services provided were done so by a licensed local attorney, working independently with the client. It is clear that Avvo has not been involved in any way in the provision of actual legal services, and the Avvo site disclosures plainly inform consumers that the attorneys they worked with were independent, licensed attorneys.

We appreciate the opportunity for Avvo to comment in advance of the Committee issuing an advisory ethics opinion. However, we believe that no such opinion is necessary here, as Avvo clearly has not engaged in the unauthorized practice of law. Even if the committee disagrees with our position on the Avvo Legal Services marketplace, Legal Services will no longer be offered through Avvo by the end of July.

Thank you again for the opportunity, and don't hesitate to reach out if there are questions or if we can be helpful in any way.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Lynn Walsh". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

B. Lynn Walsh  
Exec. VP and General Counsel