

LEGAL ANALYSIS EXHIBIT

A Law Firm Cannot Be Attorney of Record

Structural and Procedural Analysis Under Connecticut Practice Book

Connecticut Practice Book 2025

A Law Firm is an Entity — Not a Person

A law firm cannot be born (age/citizenship), cannot learn (education/exam), cannot have a conscience (character/oath), and cannot sign in the "individual name" required by the Practice Book.

Conn. Practice Book §§ 2-2, 2-8, 3-1, 4-2, 60-4

THE DISPOSITIVE PROVISION: Section 4-2(a)

*"Every pleading and other paper of a party represented by an attorney shall be signed by at least one attorney of record **in the attorney's individual name.**"*

— Conn. Practice Book § 4-2(a) (2025)

Analysis: By requiring signature in an "individual name," Section 4-2 expressly prohibits a corporate signature (e.g., "Smith & Jones, LLC") from having legal effect on a pleading. A law firm cannot comply because it has no "individual name."

I. Legal Professional Titles: Definitions & Status

TITLE	DEFINITION & STATUS	AUTHORITY	FIRM?
Lawyer	A person who has been educated in the law (has a J.D.). Bound by ethical rules.	Rule 1.0; Preamble	NO
Attorney	A person admitted to the bar. "Lawyer" by education; "attorney" by license.	§ 2-2	NO
Attorney of Record	An attorney who filed an Appearance (JD-CL-12) in a specific case.	§§ 3-1, 3-8	NO
Counsel / Counselor	Address for the attorney arguing the case. Role of advisor.	§ 60-4	NO
Esq. (Esquire)	Courtesy title after an attorney's name . Signifies licensure.	Custom; § 2-2	NO

II. Who Can Be "Attorney of Record"?

#	LEGAL ACTOR	ELIGIBLE?	AUTHORITY	REASONING
1	Individual Licensed Attorney	YES	§§ 2-8; 3-1	Full Authority. Meets age, citizenship, character. Signs in individual name.
2	Law Firm (Entity)	NO	§ 60-4	Entity Only. Cannot take oath, meet human requirements, or sign individual name.
3	Self-	YES	§ 3-1	Self-Representation.

	Represented (Pro Se)			Counsel of record for own case only.
4	Authorized House Counsel	LIMITED	§ 2-15A	Employer Only. Attorney of record for employing organization only.
5	Pro Hac Vice Attorney	CONDITIONAL	§ 2-16	Temporary. Requires accompanying CT attorney of record.
6	Legal Intern	NO	§ 3-14	Supervised Only. Not attorney of record; acts under supervision.

III. Six Structural Barriers to Firm as Attorney of Record

1. The "Human" Clauses

Section 2-8 uses language biologically impossible for a firm: "age" (18+), "cognitive capacity," "citizen."

§ 2-8 (Age/Citizenship)

2. The "Education" Clauses

Admission requires J.D., bar exam, CLE. A firm cannot attend law school or take an examination.

§ 2-8 (Education/Exam)

3. The "Conscience" Clauses

"Good moral character" and Attorney's Oath required. A firm has no conscience and cannot swear.

§ 2-8; Attorney's Oath

4. The "Individual" Clauses

Section 4-2 demands signature in "individual name." Firm signature has no legal effect.

§ 4-2(a)

5. The "Structural" Clauses

Section 60-4 creates separate definitions: "Counsel of record"

6. The "Form" Requirements

Form JD-CL-12 requires individual attorney name and juris number. No

(attorneys) vs. "Entity" (firms).

§ 60-4 (Definitions)

field for firm appearance.

§§ 3-1, 3-8; JD-CL-12

IV. Practice Book § 60-4 Definitions (Key Excerpts)

"Counsel of record" shall include all attorneys and self-represented parties appearing in the trial court...

"Entity" means any corporation, limited liability company, partnership, limited liability partnership, firm or any association that is not a governmental entity or its agencies.

— Conn. Practice Book § 60-4 (2025)

Structural Proof: By creating separate definitions—"Counsel of record" (attorneys/individuals) vs. "Entity" (firms/corporations)—the Practice Book makes it legally impossible for one to be the other.

CONCLUSION

The Connecticut Practice Book unambiguously requires that an "attorney of record" be a **natural person** who can meet age, citizenship, character, education, and oath requirements, and who can sign pleadings in their **individual name**. A law firm, as a legal entity, is structurally incapable of meeting any of these requirements.

Source: Connecticut Practice Book (2025 Edition), §§ 2-2, 2-8, 3-1, 3-8, 4-2, 60-4; Attorney's Oath (C.G.S. § 1-25)

IMPORTANT NOTICE: This content is for educational use only and does not constitute legal advice. It was created with the aid of Artificial Intelligence. Because AI can make mistakes, omit critical details, or misinterpret the law, you must independently verify all facts and legal citations against official records, state rules, and statutes to make informed decisions. Consult with a qualified attorney for legal advice. Use this information at your own risk.