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To: Rules\_Comments@ao.uscourts.gov  
cc:  
Subject: Proposed Federal Rule of Appellate Procedure 32.1

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Dear Mr. McCabe,

I write to oppose proposed new Rule 32.1 which would require courts to permit the citation of "unpublished Memoranda Dispositions." As a former law clerk in the Ninth Circuit, the use of unpublished memoranda dispositions allows the court to concisely and quickly deliver a decision to the litigants in a particular case (in an efficient manner), given scarce judicial resources. Please reconsider the adoption of proposed new rule 32.1.

Sincerely,

Pedro Sandoval, Jr., Esq.

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