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Paralegal  
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# Reporter

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working with

**Multiple Attorneys**

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*The Lifeline of Your Office*

**CP EXAM**  
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## President's Message

Jessi Stucke, ACP, CEDS

I trust that 2025 has treated all of you well so far, and we're so close to spring! With this issue of the newsletter, we don't typically have any major events coming up, but I do want to take this opportunity to talk about how busy SDPA is. By busy, I mean there are quite a few projects in the works, all being carried out by our dedicated, hard-working members:

### CP Exam Study Group

SDPA's study group is back after many years on hiatus. We are so lucky to have members who are willing and able to donate their time, not just in leading the group, but in building plug-and-play resources for future group leaders to run with. Please see NALA Liaison Clara Kiley's report on the next page for all of the details!

### Membership Renewals / Database project

Renewals are complete, as we are now past the delinquent renewal date. Following up with members at this time of year involves a lot of tracking and time, and I thank Autumn Nelson for doing that for us. The committee will now be able to help maintain the abbreviated roster that was discussed at the October meeting. Watch for an email from me in the near future which will let you know that it's live and where you can access it. The committee is also going to look into options for a membership database. The work has always been done manually, and we're looking for ways to automate the process. Our goal is to have that in place before renewals begin for 2026.

### Bylaws project

The Executive Committee is going through the bylaws to identify areas that may be due for an update or other revision. We started looking at this mainly in light of the current committee structure in relation to the number of volunteers and the type of activities that are most beneficial for SDPA in relation to the amount of time that it takes to make those things happen. Because of the nature of the two-vote process for changing the bylaws, we wanted to make sure we catch any other potential changes that should be considered by the membership. The EC will provide a redlined proposal this spring with the annual meeting notice.

### Annual Seminar

The Education Committee is running at its usual hero-speed. They are already well underway in planning for our annual seminar, which will be held Friday, June 20, at the Ramkota Hotel in Rapid City. Please save the date!

### Odds & Ends

- Treasurer Tasha Altmann and I will start work this spring to attempt to obtain tax-exempt status.
- As part of winding up my last term as President, I will be scanning and uploading the old corporate book to the Google Drive, and I will be uploading the old editions of the newsletter (already digitized) that were given to me by Karen Jaqua when she retired.

I hope you enjoy this edition of the *Reporter*!

## 2024-2025 Executive Committee

### PRESIDENT

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### Mission Statement

- To establish good fellowship among members, NALA, and the legal community.
- To encourage a high order of ethical & professional attainment.
- To further the education of members of our profession.
- To cooperate with bar associations.
- To support and carry out the programs, purposes, aims, and goals of NALA.

# NALA Liaison's Report

Clara Kiley, ACP



I hope everyone is staying warm and cozy during our long South Dakota winter. A friend and I regularly walk in the morning before work. A walk in the fresh air outside is much better than a walk on the circle track at the "rec" center, as long as the temperature is above 15 degrees. We are training for a pilgrimage in May 2025 and encourage each other to keep going. Having someone help to keep you on track to accomplish your goals is important.

I would like to recognize two SDPA members who are encouraging other members to study for and obtain the certified paralegal designation. Long-time member, Jen Frederick, CP, is leading a study group in Watertown, as well as creating a study guide that can be used by her group and others to prepare for the exam. Amber Woldt is a newer member from Sioux Falls who accepted my big ask of her to lead a study group in Sioux Falls. Together, the groups have ten paralegals preparing for the exam.

Another long-time member, Vicki Blake, ACP, of Sioux Falls has agreed to act as a proctor for the knowledge portion of the CP exam. We have tentatively scheduled the knowledge exam for June 14, 2025, in Sioux Falls at a site yet to be determined. This will eliminate the need for CP candidates to travel to Omaha or other distant testing sites for the exam. You do not have to be a member of one of the study groups to take the knowledge exam on this date in Sioux Falls.

The plan is to schedule the skills exam for a fall 2025 date. There are also candidates who plan to take the knowledge portion of the exam in fall 2025. We hope to be able to offer both exams this fall with a live proctor again.

I would like to encourage each of you to consider obtaining your CP credential. For me, it gave me confidence in my knowledge of the legal field and a sense of personal accomplishment. The support and camaraderie of the study group I was in way back when was instrumental in my reaching this goal. It was also an opportunity to network with others in my career field.

Once you have your CP credential, the next step is the advanced certified paralegal credential. Completing one of the ACP credentials earns you 20 CLE credits and high level of expertise in a particular area of study. There are 14 ACP course offerings to choose from. After nearly 25 years of being a certified paralegal, I recently obtained my ACP credential in Discovery. Even after all this time, earning the ACP gave me a little pep in my step and reignited my interest in the legal field.

If you would like more information about how to obtain your CP or ACP credential, please feel free to contact me at [pckiley@msn.com](mailto:pckiley@msn.com) or check out the NALA website.

## CALENDAR

### MARCH

- 21 \* Standing Out While Stepping In: ..... 12pm  
5 Ways to Differentiate Yourself with Authenticity and Integrity
- 27 \* Billable Hours: Precision Strategies to ... 12pm  
Enhance Your Billing Efficiency
- 28 \* Intro to Intellectual Property Law ..... 12pm

### APRIL

- 3 \* The Power of Preparation:.....1pm  
How Paralegals Shape Outcomes
- 9 \* Conscious Communication: .....1pm  
Adult Bullying in the Workplace
- 17 \* Streamlining Operations in Your ..... 12pm  
Personal Injury Law Firm
- 23 \* New Developments in Social .....1pm  
Security Overpayments Practice

### MAY

- 1 \* Conscious Communication .....1pm  
within the LGBTQ+ Community
- 2 \* AI Methods in Law Firms ..... 12pm
- 9 + Joint Family/Criminal Law CLE..... 8am-4pm  
*Ramkota Hotel, Sioux Falls* ..... [Register here](#)
- 20 \* American Companies' Use of.....1pm  
Immigration Law: H-1B Petitions
- 21 \* HR & Office Management Essentials: .....1pm  
Streamlining Your Law Firm for Success
- 30 \* Ethics and Confidentiality..... 12pm

### JUNE

- 19 SDPA Social .....Evening TBD  
*Location TBD*..... *Rapid City*
- 20 SDPA Seminar/Annual Meeting.....All day TBD  
*Ramkota Hotel*..... *Rapid City*

### ON-DEMAND

- NALA Leadership Courses^ .....[Register Here](#)
- NALA Pre-Recorded Webinars^ .....[Register Here](#)
- NALA Self-Study Courses (incl. CP/ACP) .....[Register Here](#)

\* NALA live webinars: CST/CDT. Course info and registration available [here](#). ^ Indicates some NALA on-demand education/leadership courses free to NALA members. Check [here](#).

\*SD State Bar seminars/webinars: CST/CDT.

Register for virtual CLE opportunities provided by other NALA affiliates [here!](#)

# ETHICS CORNER

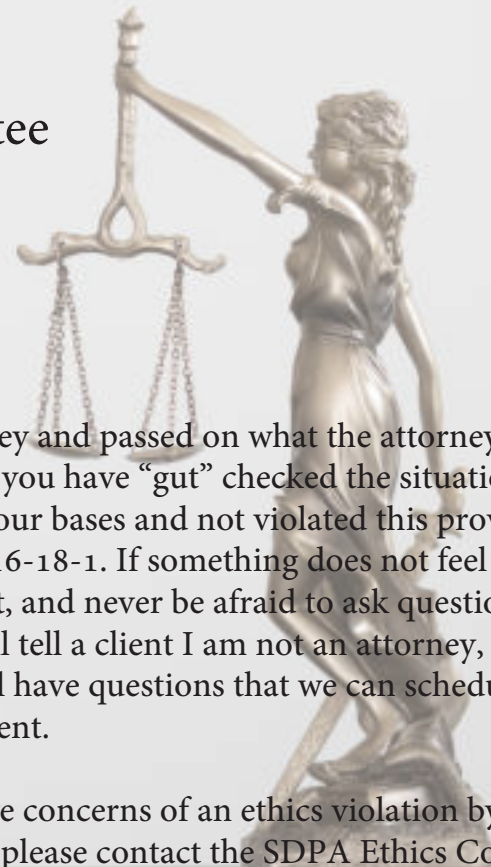
by Ethics Committee

## *The Lifeline of Your Office*

Ethics is truly an accountability check for following the rules. A seminar will remind you of what you can and can't do, but implementing that in your office should remain constant. However, making sure you follow the rules ensures that your attorney is doing their job and that you are doing yours daily. Make sure you are not waiving any confidentiality or bending any rules you should not. One should also follow the sniff test when it comes to doing something at work. No case is worth doing something wrong that would result in your attorney losing their license or you losing your job for not following the ethical rules of an attorney or paralegal. Because if the rules are not followed, there goes the lifeline of your office. Think of ethics as being the brain and heartbeat of the office. Without that, there is no office.

NALA has the NALA Code of Ethics and Professional Responsibility which should be followed. We have posted the NALA Code of Ethics in this newsletter as a guide of what paralegals can and cannot do. I encourage you to read those and use these as your road map for staying ethical. Each state also has their codified laws which outline the ethics lawyers and non-lawyers should follow. SDCL 16-18-1 states that: "No person shall engage in any manner in the practice of law in the State of South Dakota unless such person be duly licensed as an attorney at law." I encourage you to read those statutes and canons and use these as your roadmap for staying ethical within your office.

Remember this before answering a client question which would be construed legal advice without discussing this with an attorney. If you have asked



the attorney and passed on what the attorney has said, then you have "gut" checked the situation and covered your bases and not violated this provision of SDCL 16-18-1. If something does not feel right don't do it, and never be afraid to ask questions. I often will tell a client I am not an attorney, and if they still have questions that we can schedule an appointment.

If you have concerns of an ethics violation by a paralegal, please contact the SDPA Ethics Committee. If there is a concern of an attorney violating an ethical code, contact the State Bar of South Dakota, and they can assist in determining if it is truly an ethical violation. Attorney Sander Morehead, Chair of the South Dakota State Bar Ethics Committee, spoke at our fall SDPA seminar on the issue of ethics. He shared many helpful tips on ethics reminding us that paralegals serve many roles, but they should not (1) Practice law; (2) Give legal advice; (3) Accept/reject retention for a case or negotiate fees; (4) Appear or argue/question in a proceeding; or (5) Do any of the "dos" without attorney supervision.

If you were unable to attend the fall seminar, I would encourage you to speak with the SDPA librarian and obtain the materials to brush up on ethics and to make sure your lifeline continues to flow in our office so just like in life, we remain on the up and up. Stay ethical my friends, and life will be good.

Written by: Dixie A. Bader, CP  
Certified Paralegal at Burd & Carper Law Office



## REMINGTON v. IVERSON

2025 S.D. 1 – January 2, 2025

Civil – property defect (failure to disclose, fraudulent misrepresentation, breach of fiduciary duty)

*Procedural history:* The Circuit Court granted summary judgment in favor of the defendant, determining that a property disclosure statement was not required because this was a commercial sale. The court did not address the common law nondisclosure claims against the defendant. Plaintiffs appealed, and the defendant filed a notice of review regarding attorney fees and costs.

*Result:* Affirmed as to the Circuit Court's determination that a disclosure statement was not required regarding the non-residential portion of the property. Reversed and remanded for further proceedings to determine whether or not the defendant breached his fiduciary duty in failing to provide a disclosure to the plaintiffs regarding the residential portion of the property. The Circuit Court's summary judgment finding on the plaintiffs' claim against defendant for direct liability, and the defendant's notice of review is dismissed due to lack of jurisdiction.

## UNITED STATES v. KUJALI STRAWTHER

USCA 23-3779 – January 10, 2025

D.S.D. Southern Division

Criminal – felon in possession of a firearm (traffic stop/probable cause, reasonable suspicion). Defendant appeals the District Court's denial of his motion to suppress evidence and the finding that the traffic stop and vehicle search were warranted. Appeal dismissed.

## UNITED STATES v. JAYDEN KUSIEK WOLF

USCA 24-1540 – January 16, 2025

D.S.D. Southern Division

Criminal – Anders case. The appeal waiver in the defendant's guilty plea agreement is valid, enforceable, and applicable to the sentencing issue raised in the appeal. Appeal dismissed.

## CURTIS TEMPLE v. BRYAN MERCIER, ET AL.

USCA 24-1217 – January 28, 2025

D.S.D. Western Division

Civil – 5<sup>th</sup> Amendment procedural due process (impoundment of cattle upon trespass on tribal trust land) (post-trial)

*Procedural history:* Plaintiff appeals the District Court's judgment in favor of the defendants upon finding that the notice procedures provided Plaintiff with a meaningful opportunity to respond to and contest the tribe's trespass determinations prior to impoundment.

*Result:* Affirmed. (Clerk summary outlines the result of other challenges related to the District Court's denial of Plaintiff's motion to continue the trial.)

## WILBUR-ELLIS COMPANY, LLC v. TAIT LACEY

USCA 23-2648 – February 3, 2025

D.S.D. Southern Division

Civil – employment contracts (non-compete)

*Procedural history:* The District Court denied Plaintiff's motion for a preliminary injunction, both sides appeal.

*Result:* Affirmed. (Clerk summary outlines the appellate court's finding regarding the merits.)

## VOR, INC. v. ESTATE OF O'FARRELL

2025 S.D. 2 – February 5, 2025

Civil – eviction action/forfeiture

*Procedural history:* The Circuit Court denied Paul O'Farrell's motion to dismiss against VOR and the co-plaintiff colony's eviction action, which was filed under the forcible entry and detainer (FED) statutes, claiming the eviction action should have been a compulsory counterclaim in his pending undue influence suit against his sibling, their parents' trust, and the colony. After a court trial, which took place after denying Paul's motion for a continuance/request for a jury trial, the Court granted the eviction, ordering Paul to vacate within ten days, and that the colony would keep any personal property left behind by Paul.

*Result:* Affirmed as to the Circuit Court's determination that the eviction was not a compulsory counterclaim in the undue influence proceeding and that Paul's request for a jury trial was untimely. The Circuit Court did not abuse its discretion in denying the request for a continuance or in excluding evidence relating to undue influence. Reversed and remanded for a revised judgment as to the Circuit Court's error in ordering the forfeiture of Paul's personal property.

## TWO EAGLE v. AVEL ECARE

2025 S.D. 3 – February 5, 2025

Civil – medical malpractice, ordinary negligence regarding medical provider's treatment of a patient who caused an accident due to suffering a stroke consistent with a known seizure history.

*Procedural history:* Plaintiff appealed the Circuit Court's granting of summary judgment in favor of the defendants in concluding that the defendants owed no duty of care to the plaintiff because there was no relationship between them that would establish a duty, and that imposing such a duty would be contradictory to public policy.

*Result:* Affirmed, with the Supreme Court noting public policy considerations as to how the imposition of duty under either of the plaintiff's theories could negatively impact the physician-patient relationship and lead to overly-restrictive treatment recommendations.

## UNITED STATES v. MICHAEL HOEFT

USCA 23-2835 – February 5, 2025

D.S.D. Southern Division

Criminal – traffic stop. Officer had reasonable suspicion, the stop did not become unreasonable because reasonable suspicion was not dispelled and subsequent search after removing driver from vehicle was warranted. Constitutional challenge to the felon-in-possession statute is rejected (see clerk summary for details). Appeal dismissed.

## SIOUX STEEL COMPANY v. INS. CO. OF THE STATE OF PA

USCA 24-1121 – February 6, 2025

D.S.D. Southern Division

Civil – insurance (construction defect/foreign commercial general liability, breach of contract/bad faith)

*Procedural history:* Plaintiffs appeal the granting of defendant's motion for summary judgment on the bad faith claim (policy exclusion was unambiguous and precluded coverage).

*Result:* Affirmed.

## UNITED STATES v. ANTOINE THOMAS

USCA 24-1409 – February 10, 2025

D.S.D. Southern Division

The District Court was free to credit text-messaging evidence, along with corroborative



evidence, and the evidence was able to be used by the Court to determine the quantity of the drug at issue. Appeal dismissed.

**BLACK HILLS ADVENTURE LODGING, LLC v. STATE OF SOUTH DAKOTA DLR, REEMPLOYMENT ASSISTANCE DIVISION**

2025 S.D. 4 – February 12, 2025

Civil – reemployment assistance benefits/independent contractor status

*Procedural history:* Plaintiff appealed to the Circuit Court from an ALJ determination that Plaintiff owed unemployment benefits for a former custodian, whom Plaintiff claimed was an independent contractor, because the custodian was neither free from Plaintiff's control nor customarily engaged in an independently established trade. The Circuit Court affirmed.

*Result:* Reversed as to the Circuit Court's finding that the ALJ was correct in determining that the custodian was an employee because she was not free from Plaintiff's control.

*Affirmed as to the Circuit Court's finding that the ALJ was correct in determining that the custodian was not customarily engaged in an independently established trade because she didn't provide similar services to others, she didn't advertise these services to others, and she was wholly dependent on Plaintiff for work. Additionally, the Supreme Court reversed the Circuit Court's determination that Plaintiff was liable for wages paid to "others similarly situated" because employment status must be determined on an individual basis according to the unique nature of each of those business relationships.*

**DECRAMER v. DORALE, MCCOOK COUNTY BD OF ADJUSTMENT**

2025 S.D. 5 – February 12, 2025

Civil – zoning appeal (residential variance)

*Procedural history:* Dorale requested and was granted a setback variance regarding the construction of his home. The DeCramers filed a petition for writ of certiorari, arguing that Board exceeded its statutory authority. The Circuit Court denied the petition, finding that the Board complied with the variance requirements, but also noting its review was limited from questioning the Board's decision and from examining the facts surrounding the variance request. The DeCramers appealed.

*Result:* The Circuit Court's decision was reversed with a remand to vacate the variance,

with the Supreme Court finding that the Board acted illegally and in excess of its authority, noting that the Board had found "nothing extraordinary in this residential district" and no special conditions or extraordinary circumstances to justify a variance.

**GEERDES v. LIKNESS**

2025 S.D. 6 – February 12, 2025

Civil – personal injury MVA

*Procedural history:* Following a jury trial in which the jury found that the defendant's conduct was not the legal cause of Plaintiff's injuries, Plaintiff filed a motion for a new jury trial, arguing that the causation issue wasn't properly submitted to the jury. The court did not rule on the motion, which resulted in its automatic denial.

*Result:* Affirmed, with the Supreme Court finding that statements by defense counsel during the trial did not constitute judicial admissions of causation because the statements were made to argue the extent of Plaintiff's damages and they did not relieve Plaintiff of her burden to prove causation. The Circuit Court did not err in denying Plaintiff's motion for a new trial.

**ESTATE OF MACK**

2025 S.D. 7 – February 12, 2025

Civil – estate distribution. After a hearing on the co-personal representatives' petition for distribution at which beneficiary Robert Mack's attorney appeared and told the Court that Robert had no objection to the proposed distribution, Robert, through new counsel, filed a motion for relief under SDCL 15-6-60(b), including a request for an evidentiary hearing to contest the purported value of the estate's assets, claiming his former counsel never notified him of the petition or the hearing.

*Procedural history:* The Circuit Court denied Robert's motion, finding his claim of lack of communication to be not credible based on Robert's previous conduct at previous hearings. The Court also concluded the distribution to have been fair and equitable. Robert appealed.

*Result:* Reversed, with the Supreme Court finding that the Circuit Court's denial of the motion for relief was an abuse of discretion, noting that Robert's accompanying affidavit had gone unrefuted, and Robert's former counsel is now going through disciplinary proceedings. The matter was remanded for an evidentiary hearing on the petition for distribution.

**STOCK v. GARRETT**

2025 S.D. 8 – February 12, 2025

Civil – eviction (land sale with tandem ag lease). Due to financial difficulties, plaintiffs sold ag land to the defendants, with defendants agreeing to lease the land back to plaintiffs for the first five years, with the plaintiffs then having the option to buy it back.

*Procedural history:* A jury trial was held regarding the plaintiffs' eviction action, which was commenced on the grounds that the defendants failed to make timely payments on the lease and that they had committed waste. The jury found in the plaintiffs' favor. Defendants appealed, arguing that the Circuit Court erred in denying their motion to dismiss, their motion for judgment as a matter of law, their motion for a new trial, and their proposed jury instructions.

*Result:* Affirmed, with the Supreme Court finding that the plaintiffs had complied with the notice to quit requirements, and that the mandatory mediation provisions did not apply to lessor/lessee relationships. The Supreme Court also found no abuse of discretion in the Circuit Court's denial of the defendants' proposed jury instructions because the instructions that were given adequately covered the applicable law, and the jury's verdict was supported by sufficient evidence.

**UNITED STATES v. DONALD KILLS WARRIOR**

USCA 23-3425 – February 18, 2025

D.S.D. Western Division

Criminal – Failure to register as a sex offender

*Procedural history:* Defendant appeals the District Court's denial of his motion to dismiss, which was made on the grounds that his successive prosecutions in tribal court, followed by federal court, constituted double jeopardy.

*Result:* Affirmed; the dual-sovereignty principle allows for prosecution of the same conduct by both the tribe and the federal government.

**WEILAND v. BUMANN**

2025 S.D. 9 – February 19, 2025

Civil – personal injury MVA

*Procedural history:* This matter went to jury trial following the Circuit Court's denial of Plaintiff's motion for summary judgment on the negligence, contributory negligence, causation, and failure to mitigate damages claims, and

on the Court's denial of Defendant's request to apply a recklessness standard instead of the ordinary negligence standard. At trial, certain law enforcement records, and certain representations by the defendant's insurance adjuster were excluded. The jury found defendant negligent, and also found Plaintiff to be contributorily negligent. Plaintiff appealed and defendant filed a notice of review.

*Result: Affirmed, with the notice of review being therefore unnecessary. The Circuit Court's denial of summary judgment, and its judgment as a matter of law on negligence were proper and are also moot in light of sufficient evidence to support the jury's findings. The evidentiary rulings on the law enforcement materials did not result in prejudice because similar testimony was allowed. The evidentiary ruling on the insurance adjuster's testimony was upheld because there had been no offer of proof. The Circuit Court did not abuse its discretion in denying a jury instruction on liability insurance and a per diem argument for non-economic damages because the evidence did not support the argument.*

**PUFFY'S, LLC v. STATE OF SOUTH DAKOTA DEPT OF HEALTH**

2025 S.D. 10 – February 19, 2025  
Civil – mandamus (medical cannabis registration certificate)

*Procedural history: The Department appealed the Circuit Court's granting of a writ of man-*

*damus on the grounds that the Circuit Court lacked jurisdiction and abuse of discretion as to granting the writ without an evidentiary hearing.*

*Result: Affirmed. The Circuit Court had jurisdiction because Puffy's had no administrative remedy to exhaust since the Department had not taken a final action, and the Circuit Court was correct in determining that the relevant administrative rule mandated issuance of the certificate. The Circuit court did not abuse its discretion in granting the writ because the case turned on legal interpretation rather than any factual dispute.*

**UNITED STATES v. JEREMY YOUNG**

USCA 24-1303 – February 20, 2025  
D.S.D. Central Division  
Criminal – Firearms offense. Defendant appeals the striking of various jurors as not race-neutral under the *Batson* framework. See the clerk's summary for an outline of the procedural details and the corresponding juror-specific determinations. Appeal dismissed.

**UNITED STATES v. JEREMY YOUNG**

USCA 24-1311 – February 20, 2025  
D.S.D. Central Division  
Criminal – Assault on a federal officer. Admission of evidence was valid and the evidence was inextricably intertwined, admission of police interview statements was valid, and the evidence was sufficient to support various convictions because a reasonable jury could

*find that the officer was struck voluntarily and intentionally. Appeal dismissed.*

**UNITED STATES v. CODY NEWITT**

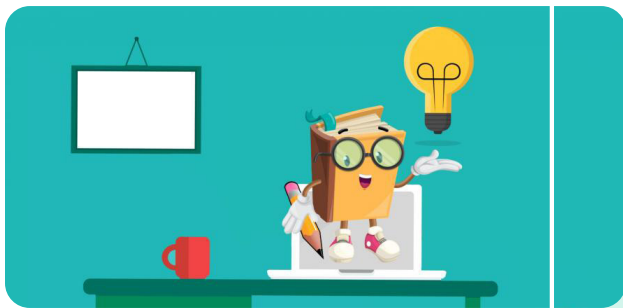
USCA 24-2101 – February 21, 2025  
D.S.D. Western Division  
Criminal – Sentencing upon revocation of supervised release. The within-guidelines range sentence was not substantively unreasonable. Appeal dismissed.

**LANGBEHN v. LANGBEHN**

2025 S.D. 11 – February 28, 2025  
Civil – breach of fiduciary duty (trust)

*Procedural history: Defendant Michael Langbehn appealed the Circuit Court's granting of summary judgment in favor of Plaintiff Mary Langbehn as to her claim of breach of fiduciary duty by Michael in his capacity as co-trustee of his deceased father's trust, and against Michael's counterclaims for unjust enrichment and quantum meruit related to improvements he had made on trust real estate. The court also removed Michael as co-trustee.*

*Result: Affirmed as to summary judgment on Michael's counterclaims. Reversed and remanded as to summary judgment on Mary's breach of fiduciary claim for outstanding issues of material fact. In conjunction, the removal of Michael as co-trustee was also reversed and remanded.*



## CP EXAM TIPS & TRICKS

Studying for the exam already?

Still deciding whether you want to go for it?

Here are the first tips from what will be a series of suggestions and encouragement from SDPA's CP and ACP members.

When I was studying for the exam, I had flash cards that I put on my desk. I switched to a different card twice a day.

I also found the mock exams to be very helpful!

Clara Kiley, ACP

I joined the SDPA study group, and the leader had extra quizzes and writing prompts from previous versions of the exam. If I didn't get a passing score on those, I knew what I needed to spend more time on!

Jessi Stucke, ACP, CEDS

I had to take the knowledge portion twice. The first time, I just did practice quizzes, and that didn't work for me (although I was close to passing - I was within four points).

So what I really recommend is flash cards. You can make them with Quizlet if you know what the terms mean and how to apply those terms.

Want a copy of the flash cards?

Contact Grace Collum, ACP!



# 5 Tips for paralegals working with Multiple Attorneys

by Christina West

Republished with permission. This article originally appeared on the Paralegal Bootcamp blog [here](#) on December 12, 2023.



I began my paralegal career working for one attorney, in one specific area of law. Looking back on that time, I remember personal injury work was so demanding.

I felt like I was constantly putting out fires and shuffling paperwork. I thought I was busy then, but nothing prepared me for the circus act of juggling multiple cases for multiple attorneys in different practice areas. I mean really, how hard could it be?

Great paralegals tend to have qualities like attention to detail, organization, and time management. But I believe that a great paralegal also can see beyond self-doubt and fear to be able to tackle anything head-on. So, when I was tasked with assisting different attorneys who all practiced in different areas of the law... I thought – challenge accepted.

I must admit my experience as a personal injury paralegal probably gave me a slight advantage. I was used to managing client calls, updates to insurance adjusters, answering discovery, and drafting demand letters, complaints, and medical summaries all pretty much at the same time.

And when my time as a PI paralegal ended, I felt much more prepared for whatever came my way. The difference then was I only had one attorney's expectations to live up to. And if you don't have that back-

ground to help build your tolerance and confidence, then the immense work that comes with working for multiple attorneys in different practice areas can be overwhelming, to say the least.

In this article, I'll share some helpful advice for paralegals who work for multiple attorneys.

## 1. Use Your Words

This phrase is often used in childcare settings when toddlers start learning to communicate. I found it fitting for the first bit of advice to paralegals who work for multiple attorneys.

We know that attorneys are bombarded by phone calls, emails, memos, and meetings. So, there is always the unsettling chance that something gets lost in translation or misunderstood.

In my journey as this "catch-all, be-all" paralegal, I have come to realize that there is great importance in knowing when to speak up and use my words. The attorneys know that I'm doing different things for different people, but it's just not always on their radar.

I've had to learn the hard way the difference between saying "Yes, I'll do this" and "Yes, I will do this when I'm finished doing that." Knowing when to use your words is extremely helpful in setting expectations with your attorneys and you need to be specific in setting expectations when you're tasked with taking on additional work.

If you're in the middle of doing something for an attorney, then you need to make that clear if another attorney asks you to take on another file. Ask questions like, "Do you need this taken care of right now?" or "Is there an important deadline?" Clear and direct communication will be the key to balancing your case-load between multiple attorneys.



## 2. *Set Boundaries*

Even though we are comparable to superheroes, every paralegal has their limit. I realized that at the moment I started to feel myself falling behind on my to-do list or felt like the work was piling up and that I was doing something wrong.

I draft documents for the land use attorney, I handle probate for the estate planning attorney, and I dissolve LLCs for the corporate attorney. I'm working in many different areas of law and in different courts, which all have their unique deadlines and procedures. Every client matters whether it's the business owner waiting for the liquor license to be approved, or the widow who has no clue how to settle her spouse's estate.

I have to know my limits and communicate them clearly to my attorneys because otherwise, I am not going to be very good at this paralegal thing. Sometimes, you need to say, "If this needs to be done right away, I can't do it."

I've cut back on some of the other administrative tasks I was handling that I could no longer do while maintaining my paralegal caseload. My goal as a paralegal has always been to provide the best service I can in whatever capacity or role I'm tasked with, whether it's opening a file or drafting a deed.

To successfully manage our cases, we have to know when we've taken on too much and can't keep up. When you're assisting multiple attorneys in various types of matters, setting boundaries internally and externally will help you bob and weave. The work that we do as paralegals directly reflects our caseloads. My advice is to be confident enough to use your words, that way you will be able to set those necessary boundaries.

## 3. *Learn and Re-learn Time Management*

You think you're good at something until you're not. I used to think I was pretty good at managing my time in the office, but I still had a lot to learn. Managing your time in a personal injury paralegal position

differs from managing time when you're working on different matters for separate attorneys.

The idea of assisting multiple attorneys seemed easy to me at first. I figured because I had been a personal injury paralegal that I was prepared. Then I found myself trying to do it all.

I would be working on one thing for an attorney when another would walk in and ask me to do something else. I would shift gears and just come back to whatever I was originally working on.

As you can imagine that method quickly spiraled out of control like having too many internet browser tabs open at once. It took me several weeks to adjust.

I had to learn how to designate days to work on estate planning documents and decipher what can wait and what can't. I thought I was done with my to-do list days, but I utilized one until I figured out the key to this balancing act which was learning to manage my time more efficiently. Like choosing one day out of the



week to focus on a specific task or designating a day for callbacks.

I learned it from one of my co-workers who records deeds every Thursday. If the attorney just had a consultation with the clients to prepare estate planning documents, I have a few days before I need to jump on it. The process is never perfect, but it is practical and when you're juggling the needs and wants of multiple attorneys, it's everything.



#### 4. *Be Intuitive and Think Ahead*

The ability to read the room is another fantastic quality of a good paralegal. Learning your attorneys' subtle cues and preferences will help you excel in your career.

Working for multiple attorneys has taught me that every attorney has a different method to their madness. There are extremely organized attorneys, who want their files set up a certain way and then there are attorneys who are a little more relaxed in their organization and welcome the guidance of a paralegal to handle it all.

I work for both types. It is an adjustment to learn the different practices of each attorney. It can be frustrating because you're used to doing one thing a certain way and here comes something different.

I get it, but as paralegals, we have to adapt or get a new job! I think being intuitive to know what your attorney needs is crucial to managing the caseload of multiple attorneys.

If I know that one attorney needs everything printed out, then I just automatically do it. On the flip side, if I know that an attorney is more inclined to review documents electronically, then I know to create a folder for them and save the documents there.

For a while, the attorneys would remind me, but then I learned to think ahead. I learned their likes and dislikes (through trial and error). With all that the attorneys have on their plates; it is a breath of fresh air when the paralegal does things without having to be told.

#### 5. *Organize Your Office and Everywhere*

You don't need me to tell you how important it is to be organized as a paralegal. In fact, organizational skills are always listed as a necessary skill when applying for a paralegal position. If you don't have any, you must learn.

When you're working for multiple attorneys, you're tested to the max in your organizational skills. It's one thing to be organized in your PI case load, but it's another to be organized in probating an estate, handling a liquor license mailing or drafting estate planning documents.

The information, the timeline, all of it must be organized by you as the paralegal. I wasn't sure how that looked at first because the attorneys I work for all handle things differently. They don't have case lists, they needed me to be organized for them. I figured as long as I kept my office organized, I would be fine.

I realized though that in order for the office as a whole to function properly, all of it needed to be organized. If you're staring at that supply closet with disgust right now, this is your sign. Our office is small, so it is up to us as the paralegals to tackle these types of responsibilities.

I've organized attorney filing rooms, the supply closet, the copy room, in fact I eventually re-organized the entire office slapping a label on anything I could (pictured above). And guess what? My boss was like "I can find what I need without searching for it, this is great!"



Christina West is a paralegal at Parkowski, Guerke & Swayze, P.A. After practicing in personal injury for six years, she decided to expand her knowledge of the law and transitioned into a real estate paralegal role. After a year of learning all things real estate, her journey led her to her current firm where she handles a variety of matters for multiple attorneys.

She is a Delaware native and graduated from the University of Delaware with a bachelor's degree in criminal justice. She continued her education at Delaware Technical Community College earning her Paralegal Certificate in 2017. She is the Newsletter Editor of the Delaware Paralegal Association since 2021. She lives at the beach with her family, and enjoys reading, movies, and being outdoors.



# GOOD ..... FOR YOU



## Clara Kiley, ACP

Clara Kiley recently became an Advanced Certified Paralegal, choosing to obtain the credential in the Discovery specialty. Clara has served SDPA in various capacities over the years, including Librarian, Treasurer, and she serves currently as our NALA Liaison. She has also played a big part in supporting the restart of SDPA's CP exam study groups, and she is incredibly supportive of the accomplishments of other members. Now it's our turn to say:

**Congratulations, Clara!**

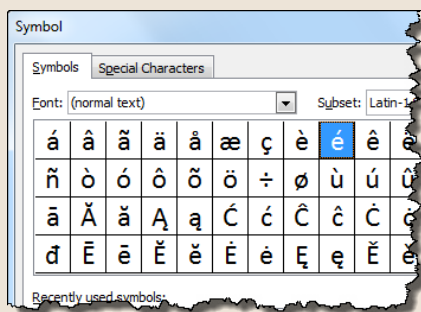
## DID YOU KNOW LETTER ACCENTS IN WORD & OUTLOOK

To achieve an accent like **á**, press the control key and ' (apostrophe) together, release, then type the letter you want to accent.

To achieve an accent on a capitalized letter like **Á**, press the Control key and ' (apostrophe) together, release, then hold down the Shift key while typing the letter you want to capitalize and accent.

Microsoft Support provides a list of shortcuts for all of the available accent marks (or diacritical marks), such as accents, cedillas, circumflexes, diaeresis/umlauts, grave accents, and tildes, [here](#).

Alternatively, you can type in Alt codes or insert special letters and other special characters, like **§** and **¶**, by using the symbols menu (go to the Insert section in the ribbon, then choose Advanced Symbol).



You can even change default keyboard shortcuts or create new ones so that, for example, when you type F5, instead of saving, you'll get the **§** symbol instead. Find out how to do that [here](#).

**P.S.** Working in a different program, or on a Mac? Take a few minutes to search online to find out how these techniques might be slightly different. Chances are, you can customize keyboard shortcuts, hot keys, and more. You'll be so glad you took the time to level up!

^ Registration is now open! The conference theme signals NALA's  
^ 50 years of excellence and innovation in serving the paralegal field. This year's conference will be NALA's return to providing the conference in an in-person-only format -- there will not be an option for remote attendance. Attendees will be able to earn up to 12.5 hours of CLE credits at the conference, plus access to the post-conference recording bundle for a total of 42 CLE hours. Early bird registration is open now through May 7, and non-members are welcome. The nightly base price for rooms is \$145 before taxes and fees.

There is a wealth of information about the conference on NALA's website [here](#), including the agenda, speaker bios, ideas of what to do in Atlantic City during your free time, a conference budget calculator, and more, all to help you plan an incredible professional opportunity!

And if Atlantic City isn't in the cards for you this year, make a plan to go to Denver in 2026! For more information, including conference dates and locations through 2030, go to NALA's website or feel free to email Clara Kiley, SDPA NALA Liaison, [here](#).



# STENOGRAPHY: THE ONLY CHOICE

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# Committee Reports

## AUDIT

Chair: Vicki Blake, ACP  
[vicki@ddlaw.com](mailto:vicki@ddlaw.com)  
EC Liaison: Sara Huber

The committee has nothing new to report.

## CLE LUNCHEONS

Chair: Jessi Stucke, ACP, CEDS  
[JStucke@rwwsh.com](mailto:JStucke@rwwsh.com)  
Members: Vicki Blake, ACP  
Jennifer Frederick, CP  
Paula Haight, CP  
Jessica Huyck, ACP  
Carrie Reider, CP  
Laura Stewart

No report.

## EDUCATION

Co-Chairs: Rebecca Goeken  
[GoekenR@GoosmannLaw.com](mailto:GoekenR@GoosmannLaw.com)  
Courtney Vanden Berg, CP  
[Courtney@Strangelaw.com](mailto:Courtney@Strangelaw.com)  
EC Liaison: Sara Huber  
Members: Dixie Bader, CP  
Paula Haight, CP  
Rebekah Mattern  
Kirby VanLint

First, on behalf of the Education Committee, we would first like to welcome our new committee members. We are so glad you have decided to join us this year and hope you all enjoy the experience too. The Education Committee is currently reviewing all of the preference forms from last year and will start compiling its agenda and speakers for the Annual Meeting and Seminar this June, which is set to take place at the Ramkota Hotel in Rapid City, South Dakota, on June 20, 2025. We hope to release the agenda by the of March. As a reminder, you do not have to be a member of the SDPA to attend the seminars, so please block your calendars now and don't forget to bring all your paralegal/legal assistant friends with you. Our seminars are not only educational; they are also a great way to network and meet other legal-minded individuals from all over the state. We hope to see you all there!

We plan to continue to work closely with the website/social media committee to get a Facebook event posted as soon as we have the agenda finalized, which will provide a great platform for updates and information about our seminar, so keep on the lookout.

We really enjoy the opportunity to put on these great seminars; however, we cannot do it without the generous help from our sponsors. If you, your firm, or anyone you know would like to sponsor

an upcoming seminar, please complete a Sponsor Confirmation Form. The form can be found on the SDPA website, or you can email the committee for a copy of the form.

Please keep in mind, the Education Committee always welcomes recommendations on topics, speakers, and ways to improve our educational seminars and ourselves within this amazing career. So, do not hesitate to share your thoughts or ideas with us and we will work on implementing them in our upcoming seminars. Please email any recommendations for upcoming seminars to Rebecca at [GoekenR@Goosmannlaw.com](mailto:GoekenR@Goosmannlaw.com) and Courtney at [Courtney@strangelaw.com](mailto:Courtney@strangelaw.com). Also, there is a lot of work that goes into planning these events. If you want to help or be a part of the Education Committee, please consider completing the committee preference forms that will be included with the Program at the June seminar. We would love to have you on the Education Committee!

## ETHICS

Chair: Jennifer Frederick, CP  
[Jen@SchoenbeckLaw.com](mailto:Jen@SchoenbeckLaw.com)  
EC Liaison: Sara Huber  
Member: Dixie Bader, CP  
Rebekah Mattern

The Ethics Committee would like to direct everyone to our article in the Ethics Corner, authored by Dixie Bader, CP. Thank you, Dixie. We will continue to provide SDPA with helpful information on our ethical duties as paralegals.

## JOB BANK

Chair: Laura Stewart  
[LStewart@FullerAndWilliamson.com](mailto:LStewart@FullerAndWilliamson.com)  
EC Liaison: Sara Huber  
Members: Kayne Larimer, ACP  
Ashly Luke

Open positions are listed on page 14. The complete postings are available on our website [here](#).

## LIBRARY

Courtney Vanden Berg, CP  
[Courtney@Strangelaw.com](mailto:Courtney@Strangelaw.com)

The library is up to date on all CLE materials including the luncheon CLEs. All CLE materials are ready for anyone looking to stay up on their CLE requirements for NALA. If you or someone you know is in need of CLE credits, please keep the library in mind. We have the library catalog available online at <https://www.sdparalegals.com/news-resources>, and all materials can be checked out through the SDPA store making checking materials out easy. If you have any recommendations for additional materials, please let me know.

As a reminder, recordings of previous seminars can be checked out by SDPA members for \$45.00 or \$60.00 for nonmembers (pricing includes postage). Let me know what seminars you were not able to attend but would like to view, and I can get the DVDs out to you.

The library also has one (1) copy of the most recent NALA Certified Paralegal Exam manual available for members to check out if you are thinking now is the time to get certified. Members are allowed to use the manual for three months to study for the exam after paying a \$100.00 deposit. The manual is an excellent resource for anyone studying for the CP exam.

If you have questions or would like to check out any of the library materials, please email Courtney L. Vanden Berg, CP, at [courtlyn@hotmail.com](mailto:courtlyn@hotmail.com) or [courtney@strangelaw.com](mailto:courtney@strangelaw.com)

## MEMBERSHIP

Co-Chair/ Autumn Nelson, ACP  
EC Liaison: [AutumnN@HalbachLawFirm.com](mailto:AutumnN@HalbachLawFirm.com)  
Co-Chair: Jessi Stucke, ACP, CEDS  
[JStucke@rwwsh.com](mailto:JStucke@rwwsh.com)  
Members: Stephanie Bahr  
Rebecca Goeken

As of March 1, 2025, we have 74 members. If you work with or know any paralegals or legal assistants who are interested in joining SDPA, please have them contact Autumn at [AutumnN@HalbachLawFirm.com](mailto:AutumnN@HalbachLawFirm.com). Also, please remember to update any changes in your employment, home or work contact information and email address so that you receive timely notices, newsletters, and other important emails. All changes can be sent to Autumn.

We are starting discussions on events the Membership Committee could execute for 2025. If you have any ideas, or are interested in hosting a mixer or any other type of event that would promote membership in SDPA, please contact Autumn.

## NEWSLETTER

Chair: Jessi Stucke, ACP, CEDS  
[JStucke@rwwsh.com](mailto:JStucke@rwwsh.com)  
Members: Jennifer Frederick, CP  
Karen Armstrong, PP, PLS  
Stephanie Bahr  
Rebekah Mattern

We hope you enjoyed this edition of SDPA's *Reporter*. If you are interested in contributing information or articles for future issues, please contact us! We welcome tips and suggestions so that we can continue to provide you information to help you in your daily work and for your career.

# Committee Reports

## NOMINATIONS & ELECTIONS

Chair: Carrie Reider, CP  
[cjReider@fnbsf.com](mailto:cjReider@fnbsf.com)  
EC Liaison: Autumn Nelson, ACP  
Members: Rebecca Goeken  
Jennifer Herr, ACP

No report.

## WEBSITE

Chair: Jessica Huyck, ACP  
[Jessica.Huyck@SDstate.edu](mailto:Jessica.Huyck@SDstate.edu)  
EC Liaison: Autumn Nelson, ACP  
Members: Stephanie Bahr  
Carrie Reider, CP  
Kirby VanLint

No report.

## PROFESSIONAL DEVELOPMENT

Chair: Vacant  
EC Liaison: Autumn Nelson, ACP  
Members: None  
No report. SDPA President Jessi Stucke is handling all incoming student scholarship and CP/

ACP reimbursement applications through June 19. Sara Huber, incoming President, will handle these from June 20 through the end of the year. The scholarship and reimbursement forms are available on our website.

## PUBLIC RELATIONS

Chair: Jennifer Frederick, CP  
[Jen@SchoenbeckLaw.com](mailto:Jen@SchoenbeckLaw.com)  
Members: Taylor Hageman

We are continuing our ad campaign started last year, advertising SDPA and the use of paralegals to attorneys and law firms. We ran one ad in the Bar Newsletter in December, and are working on our second ad for publishing in April. We welcome any feedback on our ad designs or messaging, so please let us know your thoughts and suggestions.

### Career Goals

-  Paralegal
-  Ninja
-  Hero

## Cheesy Enchilada CHILI

From the Kitchen of: Clara Kiley, ACP

Servings: 6-8 (large)



### Ingredients

- 1 lb. ground beef
- ¼ c. (or more) diced onions
- 2 tbsp taco seasoning
- ¼ cup water
- 15-oz. jar of salsa con queso (you decide how spicy)
- 1¼ c. sour cream
- 4-oz. can of fire-roasted, diced, green chilis
- 1¼ c. beef broth
- ½ c. chicken broth
- 1 c. frozen corn
- 15-oz. can of pinto or chili beans
- 15-oz. can of black beans

### Instructions

Brown the ground beef and onions in a skillet, drain if necessary. Add water and taco seasoning and let that cook until the water is absorbed. Put the taco meat in a large pot or Dutch oven. Add the queso, sour cream, and both broths. Stir until the sour cream and queso are mixed in. Add chilis, corn, and beans. Stir well and bring to a boil. Reduce heat and serve immediately or keep warm in a crock pot. Serve with tortilla strips or Fritos.

You can certainly make it spicier by adding jalapenos and using spicier queso.

## Careers

The full details for these positions are on our [website](#). If you are aware of open positions to post, please contact Laura Stewart, Job Bank Chair, [here](#).

**Legal Secretary/Assistant  
RAPID CITY  
Bangs McCullen Law Firm  
1-22-2025**

**Victim Witness Legal Assistant  
CANTON  
Lincoln County State's Attorney  
8-14-2024**

## The Reporter

### SUBMISSIONS

The Reporter is published quarterly. Submissions are due to [ReporterSubmissions@gmail.com](mailto:ReporterSubmissions@gmail.com) by:  
Jan. 31 -- March  
Apr. 30 -- June  
July 31 -- September  
Oct. 31 -- December

### ADVERTISING

Rates per issue, include sales tax:  
Full Page .....\$53.<sup>25</sup>  
Half Page .....\$31.<sup>95</sup>  
Quarter Page .....\$21.<sup>30</sup>  
Business Card ....\$15.<sup>98</sup>  
Inquiries: Jessi Stucke, ACP, CEDS  
[@JStucke@rwwsh.com](mailto:JStucke@rwwsh.com)

## Q&A

**If you would like to submit a question to our members on a legal or administrative issue, please email it to the President. The President will email your question to the Membership and ask that members respond directly to you. If anyone else would like to get a copy of any information received, please contact the person who posed the question. Q&A emails go to all members. You can opt out or opt in again at any time by emailing the President.**





[CLICK HERE for COMPLETE INFORMATION](#)

**Part 1 KNOWLEDGE Exam**  
Available year-round at PSI testing centers. Contact your chosen testing center for availability.

- Administered on-demand, year-round at testing centers with preliminary results upon completion.
- 120\* multiple-choice questions covering the topics listed in Appendix A online. *Only 100 questions will be scored.*
- Subjects addressed:
  - Bankruptcy
  - Civil Litigation
  - Contract Law
  - Corporate/Commercial Law
  - Criminal Law & Procedure
  - Debtor/Creditor
  - Estate Planning & Probate
  - Family Law
  - Professional & Ethical Responsibility
  - Real Estate & Property
  - Torts
  - U.S. Legal System

Candidates must successfully complete the Knowledge Exam in order to be eligible to take the Skills Exam.

- Candidates must wait at least two weeks after passing the Knowledge Exam to take the Skills Exam.

**Part 2 SKILLS Exam**  
Candidates are eligible two weeks after passing the Knowledge Exam.

- Administered four times each year: February, April, July, and October.
- Written assignment (see Appendix A online).
- Written submissions will be evaluated according to the following criteria:

**WRITING**

- Grammar, Spelling & Punctuation
- Clarity of Expression

**CRITICAL THINKING**

- Reading Comprehension
- Analysis of Information
- Decision Making

**Re-Testing**

Candidates who do not pass the Knowledge Exam must wait 90 days before re-taking it. Candidates must pass each exam within the first three attempts at each exam during a 365-day period or wait 365 days before trying again.



[CLICK HERE for COMPLETE INFORMATION](#)

ACP certification is available for Certified Paralegals and is focused on mastery of any of the following law specialties.

Courses are self-study, web-based modules. The courses include presentations(s), detailed exercises, and a final assessment exam. Courses average 20 hours to complete.

**Self-Study / Web-Based**  
Online course module, detailed exercises and assessment.

**NALA continues to update existing ACP courses and add new ones, so please check the website. The following focus areas are available as of this publication:**

**BUSINESS ORGANIZATIONS:** Incorporated Entities

**CONTRACT MANAGEMENT**

**CRIMINAL LITIGATION**

**DISCOVERY**

**E-DISCOVERY**

**FAMILY LAW:**

- Adoption & Assisted Reproduction
- Child Custody, Child Support, Visitation
  - Dissolution Case Management
- Division of Property & Spousal Support

**LAND USE**

**PERSONAL INJURY**

**REAL ESTATE PRINCIPLES**

**TRIAL PRACTICE**



SDPA has two copies of the current edition of the CP exam manual, available for checkout from the library!

SDPA also offers one CP exam reimbursement and two ACP exam reimbursements each year for any member whose employer did not pay for the exam. These are available on a first-come, first-served basis. Get more information [here](#) (CP) and [here](#) (ACP).