

THE REALITY OF PRO SE REPRESENTATION

*Judge Denise S. Owens**

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We all played games as children. Hopscotch. Uno. Checkers. Chess. Red Rover. Duck Duck Goose. You remember. Well, all of those games had rules. In chess, one king cannot capture another king, but the queen can capture a king or any other piece on the board. In duck duck goose, if you were the goose, you were out of the game. Well, a courtroom has rules just like those childhood games we all loved. Courtroom rules, however, are specific, complex and will determine the outcome of a case. So, imagine being a pro se¹ litigant who does not know the rules. If you don't know the rules to the game, how can you win? If you don't know the objective of the game, how can you cross the finish line?

This is a question pro se litigants face every day. Representing yourself in court without an attorney is like playing hopscotch without knowing how many times to jump. The reality of pro se litigation is not that of some reality show on television or some one-hour scripted series on network television. Courtroom dramas on NBC, ABC, and USA are certainly entertaining, but real-life courtroom matters are far different. Yet, millions of people are introduced to the judicial system on a daily basis through their television sets and are given false hope and a distorted reality of what it takes to maneuver the legal system.

Pro se litigants seek to handle all sorts of matters on their own, including personal injury cases, divorce cases that deal with

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¹ Defined as “[f]or oneself; on one’s own behalf; without a lawyer.” BLACK’S LAW DICTIONARY 575 (3d Pocket Ed. 2006).

child custody rights and child support, landlord and tenant issues, and everything else.² Even people faced with jail time represent themselves sometimes in criminal matters. Pro se litigants mostly believe that they can tell their stories in less than thirty minutes, like on television, and then the judge or jury will decide what is fair and just. Pro se litigants, however, are often unaware that if proper evidence is not presented they may very well lose a case they could have won had they submitted sufficient evidence.

Pro se litigation is not a reality show. After these pro se litigants tell their stories, no credits roll and no commercial follows. The case is simply over. The parties go home. Absent an appeal, the case is closed for the rest of their lives, and the pro se litigant must live with the decision. So, what do we do about the distorted image of the American judicial system that 1) tells pro se litigants they can do it themselves and 2) hurts pro se litigants who are not prepared for the rigors of a courtroom?

INTRODUCTION

In 2010, the American Bar Association released a nationwide survey of approximately 1,200 state trial judges that exclusively dealt with the subject of pro se litigation.³ A majority of the judges, fifty-three percent, stated that the number of cases in which there was at least one pro se litigant increased in 2009.⁴ Additionally, the survey reported that the lack of representation has an impact on the outcomes of cases for pro se litigants. “[Sixty-two percent] of the judges said that outcomes were worse for the

² Legal Services Corporation (LSC) is currently the “single largest funder of civil legal aid for low-income Americans in the nation.” *Fact Sheet on the Legal Services Corporation: What is the Legal Services Corporation*, LEGAL SERVS. CORP., <http://www.lsc.gov/about/what-is-lsc> (last visited Jan. 28, 2013). In 2009, LSC reported that legal aid programs funded by the organization were rejecting nearly one million people a year for services, including cases involving consumer, education, employment, family, juvenile, health, housing, foreclosure, and income law. *Documenting the Justice Gap In America: The Current Unmet Civil Legal Needs of Low-Income Americans*, LEGAL SERVS. CORP. 1, 9, 11 (Sept. 2009), available at http://lsc.gov/sites/default/files/LSC/pdfs/documenting_the_justice_gap_in_america_2009.pdf.

³ Richard W. Painter, *Pro Se Litigation in Times of Financial Hardship—A Legal Crisis And Its Solutions*, 45 FAM. L.Q. 45, 45 (2011).

⁴ *Id.*

unrepresented parties.”⁵ The most cited problems in the survey were: “failure to present necessary evidence (mentioned by 94% of the responding judges as a problem linked to pro se representation), procedural errors (89%), ineffective witness examination (85%), and failure to properly object to evidence (81%), and ineffective arguments (77%).”⁶

The influx of pro se litigants in the courthouse is not about to end, nor are the problems associated with people who are not educated in the law but are dealing with a system as difficult as the American legal system. Further, I believe that the pro se phenomenon is going to steadily increase because of two major factors, need and technology.

I. NEED

The availability of legal forms and information on the Internet has lead many people to think that self representation is a viable alternative to hiring a traditional lawyer. However, it is “necessity” that is really fueling this influx of pro se litigants in court. In a state like Mississippi, where 22.6% of the population lives below the poverty line⁷ and the median income is approximately \$4,000 less than most neighboring states,⁸ it’s obvious that many Mississippians cannot afford the legal assistance they need. Approximately 600,000 people in Mississippi are living at or below the poverty line, which means only one legal services lawyer is available to assist 18,000 eligible individuals.⁹ “The current economic crisis, with its attendant problems of high

⁵ *Id.* at 46.

⁶ *Id.*

⁷ Tami Luhby, *Mississippi has Highest Poverty and Lowest Income*, CNN MONEY (Sept. 20, 2012, 5:59 PM), <http://money.cnn.com/2012/09/20/news/economy/income-states-poverty/index.html>.

⁸ *Income & Poverty in Your State*, CNN Money, <http://money.cnn.com/interactive/news/economy/median-poverty-income/?iid=EL> (last visited Jan. 28, 2013).

⁹ *Our Story*, MISS. ACCESS TO JUSTICE COMM’N, <http://www.msatjc.com/about.asp> (last visited Jan. 28, 2013); *see also* Hon. Jess H. Dickinson, *Equal Justice*, 82 MISS. L.J. SUPRA 53, 56 (2013) (“[The two Mississippi legal services operations] with only thirty-one lawyers, are expected to provide the legal services needed by the more than 500,000 Mississippi citizens who live in poverty. Again, to put this in perspective, imagine that Las Vegas—a city of approximately 500,000 citizens—had only thirty-one lawyers.”).

unemployment, home foreclosures and family stress, has resulted in legal problems relating to consumer credit, housing, employment, bankruptcies, domestic violence and child support, and has pushed many families into poverty for the first time.”¹⁰ However, as the need for help has increased, the funding for legal services has decreased.¹¹

One of the “largest single source[s] of funding of civil legal services for the U.S. poor has been the Legal Services Corporation (LSC), a private corporation funded by the federal government.”¹² The LSC was started by Congress in 1974 to meet the legal needs of poor families in America.¹³ One scholar points out the purpose of the LSC:

The function of the LSC is to distribute federal funding to various organizations that provide legal services to the poor and to monitor these grantees to assure that the allocated funds are being properly utilized. It was anticipated that this intermediary format by a private corporation would prevent the political favoritism in many funding allocations that would exist if such allocations were made by a government agency.¹⁴

Currently, in Mississippi there are two funded programs: (1) the North Mississippi Rural Legal Services, Inc., and (2) the Mississippi Center for Legal Services.¹⁵ Collectively, the two agencies serve all eighty-two Mississippi counties.¹⁶

¹⁰ *Documenting the Justice Gap in America*, *supra* note 2, at 5.

¹¹ See Press Release, Legal Servs. Corp., Funding Cuts Expected to Result in Nearly 750 Fewer Staff Positions at LSC-funded Programs (Aug. 15, 2012), *available at* <http://www.lsc.gov/media/press-releases/funding-cuts-expected-result-nearly-750-fewer-staff-positions-lsc-funded>. The LSC survey shows that “local legal aid programs expect to reduce staffing by nearly 750 employees in 2012, including 350 attorneys, because of funding cuts. This represents a reduction of eight percent of full-time-equivalent (FTE) positions from the end of 2011.” *Id.*

¹² Quintin Johnstone, *Law and Policy Issues Concerning the Provision of Adequate Legal Services for the Poor*, 20 CORNELL J.L. & PUB POL’Y 571, 579 (2011).

¹³ *History: The Founding of LSC*, LEGAL SERVS. CORP., <http://www.lsc.gov/about/what-is-lsc/history> (last visited Jan. 28, 2013).

¹⁴ Johnstone, *supra* note 12, at 582.

¹⁵ *LSC-Funded Programs in Mississippi*, LEGAL SERVS. CORP., <http://www.lsc.gov/local-programs/state-profile?st=MS> (last visited Jan. 28, 2013).

¹⁶ *Id.*

11,155 cases were closed by both organizations in 2011, with just thirty-two paid legal service attorneys.¹⁷ The majority of the cases dealt with family law matters.¹⁸ Of the 11,155 cases closed, a staggering 6,235 cases dealt with domestic relations.¹⁹ Therefore, it is clear that the legal services agencies are diligently working an astounding number of cases. However, the 2012 funding of the agencies was cut approximately 20%, resulting in a loss of \$863,865.²⁰ While it is clear that there is substantial need for legal services, it is also clear that the LSC and its local organizations cannot meet the need by themselves.

Thankfully, in Mississippi the LSC funded entities are not the only programs that provide legal services to the poor. Both the Mississippi Bar Association and the Supreme Court have implemented programs with the intent to provide poor Mississippians access to the courts. In 1982, the Mississippi Volunteer Lawyers Project (MVLP) was the first formal partnership of a state bar association and the LSC.²¹ Potential clients are screened by the state's LSC entities, and the MVLP staff determines if the applicants qualify for services.²² If all of the requirements are met, the MVLP matches the client with a volunteer attorney who represents the client on behalf of the MVLP.²³ The MVLP represents clients in cases dealing with "uncontested divorce, removal of minority/emancipation, wills, adoption, guardianship, name change, birth certificate correction, child support contempt, child support modification, conservatorship and visitation."²⁴ Hence, MVLP is a valuable tool in the continued commitment to ensure that Mississippians who have no other recourse have access to the courts.

The LSC funded programs and the MVLP are not the only two entities fighting to ensure that the Mississippi poor have access to the courts. Both Mississippi law schools, the University

¹⁷ *Id.*

¹⁸ *Id.*

¹⁹ *Id.*

²⁰ *Id.*

²¹ *About*, MISS. VOLUNTEER LAWYERS PROJECT, <http://www.mvlp.net/about>. (last visited Jan. 28, 2013).

²² *Id.*

²³ *Id.*

²⁴ *Id.*

of Mississippi School of Law and Mississippi College School of Law, have programs where students tackle legal issues for less fortunate clients.²⁵ Additionally, there are numerous non-profit organizations that represent Mississippians who are traditionally unrepresented.²⁶ Furthermore, the Mississippi Supreme Court created the Access to Justice Commission, to be a single unifying entity, bringing together the various providers of civil legal services.²⁷

Since its conception, on June 28, 2006, the Mississippi Access to Justice Commission has worked to “develop and establish a strategic statewide plan for delivery of legal services to the poor in Mississippi.”²⁸ In describing the project, Mississippi Supreme Court Justice Jess H. Dickinson, a member of the commission, stated, “This Commission’s overriding objective is to make sure that every citizen of this state, regardless of economic status, has reasonable access to justice and that no one is excluded because they do not have the money to hire an attorney.”²⁹ Hence, there are many agencies engaging daily to ensure that the poor of Mississippi receive legal help.

In Mississippi, it is clear that poverty continues to be the biggest culprit in the lack of access to the courts. Nearly one-fourth of the state’s population lives below the federal poverty guidelines.³⁰ The federal poverty guidelines are generated and

²⁵ *Civil Legal Clinic: Practice Areas*, THE UNIV. OF MISS. SCH. OF LAW, <http://law.olemiss.edu/civil-legal-clinic/clinical-learning-programs/practice-areas/> (last visited Jan. 28, 2013) (containing an array of areas, including Child Advocacy, Housing, Transactional, Elder Law, Street, and Tax Clinics); *Find Your Center for Success*, MISS. COLL. SCH. OF LAW, <http://law.mc.edu/academics/law-centers/> (last visited Jan. 28, 2013) (including programs dedicated to Bioethics and Health Law, Business and Tax Law, Family and Children’s Law, Public Service Law, and Litigation and Dispute Resolution).

²⁶ *See. e.g.*, MISS. CTR. FOR JUSTICE, <http://www.mscenterforjustice.org/> (last visited Jan. 28, 2013); *Legal Aid*, MISSION FIRST, <http://www.missionfirst.org/legalaid> (last visited Jan. 28, 2013); *Services*, CATHOLIC CHARITIES DIOCESE OF JACKSON, MISS., <http://www.catholiccharitiesjackson.org/services> (last visited Jan. 28, 2013).

²⁷ *Our Mission*, MISS. ACCESS TO JUSTICE COMM’N, <http://www.msatjc.com/mission.asp> (last visited Jan. 28, 2013).

²⁸ *Id.*; *Our Story*, *supra* note 9.

²⁹ *Our Mission*, *supra* note 27.

³⁰ Alemayehu Bishaw, *Poverty 2010 and 2011: American Community Survey Briefs*, U.S. CENSUS BUREAU 1, 3 (Sept. 2012), <http://www.census.gov/prod/2012pubs/acsbr11-01.pdf> (noting that 22.6% of Mississippians are living below the poverty threshold).

published yearly by the Department of Health and Human Services.³¹ The 2012 federal guidelines state that a single person living alone without any dependents is living in poverty if the individual has an income of \$11,170 or less a year.³² A family of four lives in poverty if the combined income of its members is \$23,050 or less per year.³³ Potential LSC clients are only eligible for legal services aid if the person's income is within 125% of the federal poverty guidelines.³⁴ Therefore, a single person is eligible if they make \$13,963 a year or less, and a family of four can receive attention if, collectively, the income of the family is \$28,813 or less a year.³⁵ Due to Mississippi's high poverty rate, approximately 600,000 people are eligible for services,³⁶ but there are only thirty-two LSC paid attorneys and volunteers.³⁷ Thus, while citizens living in poverty have some access to legal assistance, there are still significantly more clients than lawyers.

In order to meet the legal needs of the poor citizens of Mississippi, we must: (1) increase the number of volunteer lawyers; (2) provide self-represented litigants with competent "how to" information; (3) provide stable funding for legal services that is not constantly affected by the current political views; (4) educate the public, and particularly the business community, on how the poor population's lack of access to the courts negatively affects the economic viability; and (5) address the change in technology as it applies to the legal system.

II. TECHNOLOGY

In 0.49 seconds, Google can find over 501,000 sites after using the search term: "free legal forms."³⁸ Miraculously, in less

³¹ 2012 HHS Poverty Guidelines, U.S. DEP'T OF HEALTH & HUMAN SERVS., <http://aspe.hhs.gov/poverty/12poverty.shtml#guidelines> (last Visited Jan. 28, 2012).

³² *Id.*

³³ *Id.*

³⁴ *Fact Sheet on the Legal Services Corporation*, *supra* note 1.

³⁵ *Id.*

³⁶ *Our Story*, *supra* note 9 (representing a conservative estimate based on the number of Mississippians living at or below the poverty threshold instead of those qualifying for legal services who earn at or below 125% of the poverty line).

³⁷ *See supra* note 17 and accompanying text.

³⁸ GOOGLE, www.google.com (last visited Jan. 24, 2013) (searching for "free legal forms").

than half a second, a pro se litigant is given the key to thousands of legal forms on the Internet. The sites range in price, content, and professionalism.³⁹ Some of these legal form sites are court-sponsored, “providing online access to court forms, filing information, and attorney and mediator directories for a specific jurisdiction.”⁴⁰ A variety of sites, some even filled with incorrect information, are easy to find on the Internet, and more people are relying on these sites instead of lawyers.

Companies such as LegalZoom⁴¹ are marketing themselves directly to the public. LegalZoom runs commercials nationally, in which they make statements about their products, claiming they are an “easier, less expensive option than using a traditional lawyer” and “a better way” to approach the legal system.⁴² LegalZoom, a for profit company, sells and markets not only legal documents but also legal packages.⁴³ For example, an unrepresented litigant can purchase the Divorce Package for \$299.00.⁴⁴ The Divorce Package includes state specific divorce documents for both spouses, state specific marital settlement agreements, and a parenting plan for specifying custody arrangements and visitation schedules.⁴⁵ The documents provided are supposed to help the unrepresented litigant through all aspects of their case, including the petition, complaint, summons, and the decree.⁴⁶ Additionally, LegalZoom offers a guidebook to

³⁹ Nina Ingwer VanWormer, *Help at Your Fingertips: A Twenty-First Century Response to the Pro Se Phenomenon*, 60 VAND. L. REV. 983, 1007 (2007).

⁴⁰ *Id.*

⁴¹ LEGALZOOM, <http://www.legalzoom.com> (last visited Jan. 28, 2013).

⁴² *Law That Just Makes Sense—LegalZoom Commercial 30*, YOUTUBE (Sept. 11, 2012), <http://www.youtube.com/watch?v=I1xHweul84w&list=UUiGZICHfoVIKTCT6myF7kA&index=2>.

⁴³ *Our Products & Services*, LEGALZOOM, <http://www.legalzoom.com/products-and-services.html> (last visited Jan. 28, 2013) (offering a wide range of legal documents, including for divorce, bankruptcy and prenuptial agreements); *Small Claims*, LEGALZOOM, <http://www.legalzoom.com/lawsuits-settlements/small-claims> (last visited Jan. 28, 2013) (providing assistance with small claims matters).

⁴⁴ *Divorce*, LEGALZOOM, <http://www.legalzoom.com/legal-divorce/divorce-overview.html> (last visited Jan. 24, 2013).

⁴⁵ *Id.*

⁴⁶ *See Id.*

explain the divorce process and a review of your documents by licensed attorneys.⁴⁷

LegalZoom does not carry the package for Mississippi or several other states.⁴⁸ For states like Mississippi, they offer a legal plan where the client pays \$11.99 a month to speak to an attorney about general personal legal matters in thirty-minute increments.⁴⁹ Additionally, with this plan a customer has access to downloadable forms and legal document review.⁵⁰ LegalZoom is a corporation that sells a comprehensive approach to self litigation, and is an example of how legal forms and legal assistance has become a profitable business.

With the increase in access to information over the Internet, there is a growing school of thought that self representation is a viable alternative to hiring an attorney. The idea of self-representation being a cheaper alternative is being assimilated into the minds of anyone who watches television, listens to the radio, or searches the web. However, just because the forms are available, does not mean that they are used properly. “By and large, websites offering legal assistance to pro se litigants are either procedural or substantive in content, not both.”⁵¹ The American Bar Association has stated in its *Analysis of Rules that Enable Lawyers to Serve Pro Se Litigants*⁵² that the legal document services have limitations. “Many, if not most, litigants need more than the procedural assistance offered by these resources. . . . They need assistance with decision-making and judgment. They need to know their options, possible outcomes and the strategies to pursue their objectives.”⁵³ Access to documents is

⁴⁷ Divorce Education Center, LEGALZOOM, <http://www.legalzoom.com/divorce-guide/divorce-introduction.html> (last visited Jan. 28, 2013).

⁴⁸ See *Divorce*, *supra* note 44.

⁴⁹ *Find an Attorney you can Trust for Your Family*, LEGALZOOM, <http://www.legalzoom.com/attorneys-lawyers/legal-plans/personal.html> (last visited Jan. 28, 2013).

⁵⁰ *Id.*

⁵¹ VanWormer, *supra* note 39, at 1009.

⁵² ABA STANDING COMM. ON THE DELIVERY OF LEGAL SERVICES, AN ANALYSIS OF RULES THAT ENABLE LAWYERS TO SERVE PRO SE LITIGANTS (Nov. 2009), *available at* http://www.americanbar.org/content/dam/aba/migrated/legalservices/delivery/download_s/prose_white_paper.authcheckdam.pdf.

⁵³ *Id.* at 5.

not going to insure that pro se litigants gain access to the courts, because forms without any instruction are just pieces of paper.

The complications that arise out of using Internet-generated legal forms can be seen in the daily operations of my own courtroom. Many of the forms submitted by pro se litigants do not meet the requirements for a Mississippi Chancery Court. The forms omitt necessary information or provide information that could be potentially harmful, such as social security numbers in an unsealed file. Pro se litigants in possession of these Internet forms do not understand what the form represented, the need for the form, or the procedural order in which the forms should be filed. This miasma of misunderstanding then puts the court administrators in an uncomfortable and dangerous situation; the pro se litigants expect the administrators to tell them what to do, which results in the practice of law, clearly crossing the ethical line.⁵⁴

One particular domestic violence case demonstrates many of the challenges that occur when a pro se litigant relies exclusively on forms. The plaintiff was a woman and mother of two who alleged that the defendant, her estranged boyfriend, had physically battered her on numerous occasions. Even though the plaintiff used a form,⁵⁵ procedural and substantive challenges arose in this case that inhibited the court from making a merit-based determination. Substantively, the plaintiff arrived at court unaware that she was required to have witnesses or evidence to demonstrate her case. The plaintiff's apparent fear of the defendant made it more difficult to ascertain the facts. Compounding the plaintiff's ignorance, the defendant continuously pled his Fifth Amendment right not to incriminate himself. These factors inhibited the court from obtaining a clear indication of the facts. Procedurally, the defendant testified he had not been served. After further inquiry, the court determined that the defendant was served, but that he was not "properly"

⁵⁴ MODEL RULES OF PROF'L CONDUCT R. 5.5, *available at* http://www.americanbar.org/groups/professional_responsibility/publications/model_rule_s_of_professional_conduct/rule_5_5_unauthorized_practice_of_law_multijurisdictional_practice_of_law.html (last visited Jan. 31, 2013).

⁵⁵ While the form the plaintiff used contained instructions, I did not have an opportunity to review the sufficiency of the directions.

served. Ultimately, I was unable to make a ruling because the parties were not properly before the court. The court could not issue a restraining order because of the procedural and substantive errors committed by the plaintiff who had attempted to rely exclusively on a form. Even when judges are willing to sort through the substantive challenges presented by pro se litigants, procedural issues can create technical faults that bind the hands of the court and force judges to dismiss cases. Succinctly, as in this case, the plaintiff left court in a worse position than when she first arrived. Pro se litigants make these and other types of common mistakes daily. Further, pro se litigants likely:

- Fill out the wrong form to initiate legal action;
- Pay a filing fee for the wrong form;
- Take off work and lose income to attend a hearing;
- Face a judge who informs them that jurisdiction is either improper or that the other party has not been properly served;
- Replace the incorrect form with the correct form;
- Pay another filing fee for the correct form;
- Face the judge again and then may obtain relief they did not expect; and
- Leave court with the matter incomplete.

Additionally, pro se litigants face even more challenges when representing themselves in divorce cases. Mississippi is one of the few states that still requires that divorces be fault-based.⁵⁶ Thus, proof of fault must be established and corroborated, and requiring this higher level of proof is a tumultuous task for pro se litigants.

⁵⁶ Deborah H. Bell, *The Cost of Fault-Based Divorce*, 82 MISS. L.J. SUPRA 129, 132-33 (2013) (“The modern system of marriage dissolution presents few barriers to divorce. On spouse’s testimony that the marriage is irretrievably broken is generally sufficient proof. Most state legislatures have provided or this form of no-fault divorce since the 1970s. Mississippi is among a small minority of states that still do not permit unilateral no-fault divorce.”).

The truth is that no case is simple. Although mini-courtroom dramas vastly oversimplify the very complicated manner in which the legal system runs, real-life unrepresented litigants have to meet all the criteria in representing their cases as attorneys. Reality television, however, is becoming the standard by which some people believe the court system runs, including the cameras and quick resolutions. Hence, the unrepresented litigant has to navigate through the often confusing American legal system. Despite the misconception and confusion many Americans have about the legal system, there has been an influx of pro se litigants, and the number of pro se litigants will continue to increase.⁵⁷

CONCLUSION

As a Chancellor and a member of the Mississippi Access to Justice Commission, I am aware of the barriers that many poor Mississippians have gaining legal representation. I am also aware that the amount of pro se litigants appearing in court is not about to decline in the near future. The accessibility of legal information from the Internet and other sources that have come to life during this technological age has resulted in an attitude that a lawyer may not be needed. These new attitudes compounded with the number of citizens in the state who can't afford attorneys, are resulting with more and more individuals representing themselves in court.

If the use of legal forms is going to be part of the solution in helping more people access the courts, I believe some education must come with the forms. Forms without knowledge are just useless pieces of paper. Whether it be a mandatory clinic before all pro se litigants can proceed with trial or maybe literature sent out by the courts, a discussion is needed on how the Courts will deal with how the vast array of information available is assimilated and how to make sure the forms are correct.

Many Mississippians work tirelessly to ensure that all Mississippians, no matter their economic level have access to justice. However, due to the staggering amount of Mississippians living in poverty, the need will always be greater than the amount of aid. Every person will not be able to be helped by a legal aid

⁵⁷ See *supra* notes 28-35 and accompanying text.

attorney or a volunteer, and some people will have to represent themselves. Therefore, a discussion is needed on how to make the court more accessible and understanding to the unrepresented litigant. There are so many barriers to the pro se litigant stemming from just the basic understanding of the court system. Courts are not run as easily as the daytime shows. Procedural issues, such as jurisdiction, summons, and filing, all have to be understood and executed correctly or the case does not make it to trial. Furthermore, at trial, a litigant just doesn't tell their story, like on television, but they must prove their case using the law, evidence, and witnesses. There needs to be a systematic approach to making pro se litigation as easy as playing hopscotch, uno, checkers or chess. A courtroom has rules just like these childhood games, and pro se litigants need our help to win the game, cross the finish line and receive the justice they deserve.

