4/78 B Return of client's files

An attorney must return to a client all documents and other materials the client has given to the attorney. S/he must also return any "end product" materials for which the client has paid. These items must be returned whether or not the client agrees to pay for photocopies.

The attorney is not required to furnish to the client internal notes and memos generated primarily for the attorney's own purposes in working on the client's matters. If the client requests copies of these types of materials and the attorney agrees to furnish them, it would be proper to charge the client a reasonable amount to cover the expense of copying them.