In March 2009, the National Assembly of South Korea passed the Foreign Legal Consultants Act authorizing a partial opening of the domestic legal services market. This Act will allow a foreign lawyer to work as a Foreign Legal Consultant in Korea, and will also allow foreign law firms to establish foreign legal consulting firms in Korea. This article provides a brief overview of the Korean Foreign Legal Consultants Act encompassing historic background, requirements for a Foreign Legal Consultant, scope of practice, use of the title “Foreign Legal Consultant,” requirements for establishing a foreign legal consultant firm in Korea, related ethics issues, and suggestions for foreign lawyers and foreign law students who want to work as Foreign Legal Consultants in Korea.
II. INTRODUCTION

The Ministry of Justice of the Republic of Korea (South Korea) announced on March 3, 2009 that the Korean National Assembly passed a bill authorizing a partial opening of the domestic legal services market.\(^1\) The purpose of the Korean FLC Act is to establish prerequisites to qualify, register, and work as a Foreign Legal Consultant (“FLC”) in South Korea.\(^2\) A registered FLC is a practicing attorney in good standing in a foreign country who has a current and valid FLC Certificate of Registration as required by the Korean Bar Association.\(^3\) The FLC Act authorizes a person who is not a member of the Korean Bar or licensed in Korea as an attorney to provide legal advice in Korea limited to the law of the foreign country in which the attorney is licensed to practice law.

Because the FLC system in South Korea has not yet commenced, it is difficult to calculate the number of foreign lawyers working in South Korea. One New York state lawyer in Korea estimates that over 400 foreign attorneys work in South Korea, the majority of them being U.S. attorneys.\(^4\) These attorneys are called ByeonHoSa [“attorney”] in Korea, but their legal practice is unlike registered native Korean attorneys. For example, foreign lawyers are prohibited from signing their work product even though the work product is directly connected to their own home jurisdiction. Prior to the registered FLC system, the work product signed by foreign attorneys for legal purposes constituted an unauthorized practice of law.\(^5\) Once the FLC act takes effect,\(^6\) article 109 of the Korean Attorney-at-Law Act, prohibiting foreign attorneys from an unauthorized practice of law, such as providing legal service in Korea, will no longer be valid.


\(^2\) Foreign Legal Consultants Act § 1 (S. Korea).

\(^3\) Id. § 2.


\(^6\) In Korea, the President promulgates the bill as a new act after approval by the National Assembly. The new act comes into effect six months after promulgation. The FLC Act was adopted by Presidential Decree No. 9524, Mar. 25, 2009; Date of Enforcement: Sept. 26, 2009. See Korean Constitution § 53, providing: “Each bill passed by the National Assembly shall be sent to the Executive, and the President shall promulgate it within fifteen days.”
While the FLC Act opens the door for foreign lawyers to limited practice in Korea, there are not many introductory materials for foreign lawyers detailing the process because of its recent enactment. This article provides a brief overview for lawyers and law students who may desire a career as a FLC in Korea. First, this article details the background history of the FLC Act. Second, this article explains key clauses in the Act. Finally, this article discusses plausible problems concerning how U.S. state bar associations control their members’ practice in Korea.

III. KOREAN FOREIGN LEGAL CONSULTANTS ACT

A. Background History of the Foreign Legal Consultants Act

Every negotiation involves some give-and-take, and the Korea-U.S. Free Trade Agreement (“KORUS FTA”) is no exception. Under the terms of the KORUS FTA, Korea agreed to open its legal market to U.S. lawyers and U.S. law firms in exchange for tariff reductions of certain commodities such as cars.\(^7\) Korea’s opening of its legal market\(^8\) “was somewhat forced” under the KORUS FTA.\(^9\) The FLC Act is the result of the Korean government’s efforts to satisfy its obligations under the KORUS FTA – specifically, allowing foreign law firms to open offices in Korea.\(^10\) The FLC Act provides a framework for managing the new system and determining which foreign lawyers may register to become a FLC. A potential FLC candidate must first prove he or she is a lawyer of an eligible foreign country. An eligible foreign country is one that has an existing free-trade agreement with Korea and that completes ratification of the FTA by both countries.\(^11\) Both the Korean and U.S. government signed the KORUS FTA on June 30, 2007. As of November 2009, the KORUS FTA has yet to be ratified by either country. Despite enactment of the FLC Act, U.S. lawyers and law firms need to wait until the ratification of the KORUS FTA by both countries in order to benefit from the Korean FLC Act.

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\(^10\) Id.

\(^11\) FLC Act § 6 (1) 1 (S. Korea).
According to the FTA agreements with the U.S., there are three stages to open the Korean legal market.\(^\text{12}\) The first stage concerns provisions about FLCs such as their registration and consultation privileges:

No later than the date this Agreement enters into force, Korea shall allow, subject to certain requirements consistent with this Agreement, U.S. law firms to establish representative offices (Foreign Legal Consultant offices or FLC offices) in Korea, and attorneys licensed in the United States to provide legal advisory services regarding the laws of the jurisdiction in which they are licensed and public international law as foreign legal consultants in Korea.\(^\text{13}\)

The second stage, estimated to take about two years after the date the KORUS FTA enters into force, allows foreign law firms and Korean law firms to collaborate in cases where domestic and foreign legal issues are mixed and share derived profits.\(^\text{14}\) The third stage, estimated to take about five years, will allow foreign law firms to enter into joint ventures with Korean law firms and employ Korean professionals.\(^\text{15}\)

The first stage of the FLC Act benefits primarily foreign individuals. The second stage benefits both Korean and foreign law firms. The third stage promises the most benefit to Korea as it will allow for the establishment of international law firms offering convenient, cost-effective one-stop legal services meeting local demand with global experience and resources.\(^\text{16}\) Korean and U.S. clients will most likely benefit from the establishment of international law firms through reduced cost and increased convenience of retaining experienced U.S. lawyers in Korea.\(^\text{17}\) The availability of U.S. based global law firms in Korea may also provide U.S. companies a level of comfort and security sufficient to expand business relationships consistent with Korea’s longstanding desire to increase foreign investment activity.\(^\text{18}\) Competition in the legal services


\(^{13}\) Id.

\(^{14}\) Id.

\(^{15}\) Id.


\(^{17}\) Id.

\(^{18}\) Id.
market also carries the potential to advance Korea’s goal of becoming an important logistics and financial hub of Northeast Asia.\textsuperscript{19}

Despite numerous advantages of opening its domestic legal market, Korean lawyers express worry over potential negative effects that may result from injecting the power of global law firms into the Korean legal market.\textsuperscript{20}

To properly assess any negative effects resulting from a more open legal market, Korea will need to closely monitor foreign legal activity and its impacts at each stage. Comprehensive assessment and input from all areas of the legal realm – courts, domestic and foreign lawyers, and their clients – should be implemented at regular intervals during the first stage to determine whether the opening of its legal market produces intended benefits in a fair, responsible manner.

Korea expects a partial loss of its legal market which has been traditionally owned by domestic law firms. Korea may be able to learn from other foreign countries that have more experience with open legal markets. Germany opened their legal market in 1998.\textsuperscript{21} In 2005, eight of the top 10 law firms in Germany were operated by U.S. and U.K. law firms.\textsuperscript{22} France also opened its legal market in the 1970s.\textsuperscript{23} France was not free from the market controlling power of major U.S. and U.K. law firms.\textsuperscript{24} Currently, there are only four French-owned law firms among the top 25 law firms in France.\textsuperscript{25} From the experiences of Germany and France, Korea could learn an important lesson. That is, a primary counter measure to the partial loss of its legal market is for Korea to encourage its domestic law firms to grow in size so they can compete equally with major U.S. and U.K. law firms and protect themselves from those firms’ offensive M & A.\textsuperscript{26}

Unlike above mentioned countries, foreign lawyers or foreign law firms have not substantially penetrated the U.S. legal market. Currently, thirty U.S. states permit foreign lawyers to work as a FLC.\textsuperscript{27} The historical

\textsuperscript{19} Id.

\textsuperscript{20} Dae-Yun Jung, \textit{Korea will Open the National Legal Market Completely by the Scheme of the Three Stages in Five Years}, SISA MAGAZINE (January 13, 2009), http://www.sisamagazine.co.kr/news/articleView.html?idxno=3265 (last visited Sept. 27, 2009).

\textsuperscript{21} Id.

\textsuperscript{22} Id.

\textsuperscript{23} Id.

\textsuperscript{24} Id.

\textsuperscript{25} Id.

\textsuperscript{26} Id.

\textsuperscript{27} Those 30 jurisdictions are: Alaska, Arizona, California, Connecticut, Delaware, Dist. of Columbia, Florida, Georgia, Hawaii, Idaho, Illinois, Indiana,
background for FLC in the U.S. is different from Korea. “In re Roel, 3 NY 2d 224 (1957), Mr. Roel, a Mexican lawyer not admitted to the New York bar, acted as a consultant to New York lawyers on matters of Mexican law, and testified as an expert witness on matters of Mexican law in proceedings in New York State courts.” Although the New York Court of Appeals enjoined him from practicing in that manner, Judge Van Voorhis’ dissenting opinion recognized the important role of foreign lawyers in New York. On June 6, 1974, the Court of Appeals adopted 22 NYCRR Part 521, New York’s Rules for Legal Consultants, which allows a foreign lawyer to practice as a foreign legal consultant in New York. As of 2007, 71 foreign lawyers were newly admitted as FLCs.

B. General Provisions

1. Who can qualify as a FLC under the Korean FLC Act

As proposed on March 2, 2009, an attorney from countries with free trade agreements in place with South Korea is eligible to apply to be a FLC. At least three-years of work experience in their respective jurisdiction is required to be eligible, and in order to hold chief status, they must also have seven years of experience overall. Foreign attorneys must seek approval of the Minister of Justice and register with the Korean Bar Association.


29 Id. at 6-7.


32 Korean FLC Act § 6 (1) 1 (S. Korea).

33 Id. at § 4(1).

34 Id. at § 16(1).

35 Id. at § 6.

36 Id. at § 10.
2. Scope of Practice

A registered FLC may render the following legal services in Korea:

- Render professional legal advice on the law of the country they are associated with.\(^{37}\)
- Render professional legal advice on a treaty where the FLC’s original country is the country concerned, and on generally approved international customary law.\(^{38}\)
- Serve as representation for International Arbitration.\(^{39}\)

The FLC Acts limitation on the scope of practice is similar to the U.S. system.\(^{40}\) For example, the FLC must not “appear as a lawyer on behalf of another person in any court or before any magistrate or other judicial officer” in Korea and most U.S. states.\(^{41}\) This example, however, is the most basic one. As a practical matter, it is not easy to divide the boundaries between Korean and foreign jurisdictions’ legal matters. The American FLC system already has met criticism. One commentator notes: “this lack of clarity [in the scope of FLC’s practice] renders it less likely that foreign lawyers will use the legal consultant status because it creates anxiety about what is expected and permitted even after a license is obtained.”\(^{42}\)

3. Use of the Title “Foreign Legal Consultant”

In Korea, attorneys traditionally fulfill the important social role of protecting fundamental human rights and ensuring the realization of social justice.\(^{43}\) One of the controversies of the earlier draft of the Korean FLC Act was the title of “Foreign Legal Consultant.”\(^{44}\) The original draft of

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\(^{37}\) Id. at § 24 (1).

\(^{38}\) Id. at § 24 (2).

\(^{39}\) Id. at § 24 (3).


\(^{41}\) See FLC Act § 24; see also California Registered Foreign Legal Consultant Rules and Regulations (for an example in the U.S.), § 9.1, http://calbar.ca.gov/calbar/pdfs/rules/Rules_Title3_Div3-Ch4-FLC.pdf (last visited Sept. 27, 2009) [Hereinafter “California Registered FLC Rules and Regulations”].


\(^{43}\) Korean Attorney-at-Law Act § 1 (S. Korea).

\(^{44}\) Yongtae Kwon, “*Foreign Legal Consultant*” or “*Foreign Lawyer*”... Which *Title is Proper*, THE LAWTIMES (Dec. 8, 2008), http://www.lawtimes.co.kr/LawNews/News/NewsContents.aspx?kind=&serial=44065 (last visited Nov. 13, 2009).
Korean FLC Act prohibited foreign lawyers from using the title “Lawyer.” Instead, they must use the title of “Foreign Legal Consultant.” The original drafters were concerned that clients may think foreign lawyers were permitted to practice Korean law if they were to use the title of “Foreign Lawyer.” Some critics believe that the title of “Foreign Lawyer” would confuse potential clients who are unable to discern whether a “Foreign Lawyer” is licensed to practice Korean law. Another argument for denying the title “Lawyer” is based on reciprocity. For example, foreign lawyers who want to work as a registered FLC in California must use the title “Foreign Legal Consultant.” A FLC in California may not in any way hold himself or herself out as a member of the State Bar. However, insistence on the title “Foreign Legal Consultant” seems to be an unnecessary restriction, since titles such as “New York Lawyer” or “U.K. lawyer” are not likely to be misunderstood as “Korean Lawyer.” Unlike certain states in the U.S. where foreign lawyers must use the title of “FLC,” Japan and the United Kingdom allow foreign legal consultants to use the title “Foreign Lawyer” instead of “Foreign Legal Consultant.”

After public hearings on the FLC Act by the Korean Ministry of Justice and the Korean National Assembly, the final bill of the FLC act

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45 See Legislation & Judiciary Committee Report, supra note 8, at 56, 60.
46 Id.
47 Id.
49 Id.
50 See California Registered FLC Rules and Regulations, supra note 41, at § 10.
51 Id.
52 In the UK, a foreign lawyer can register as a Registered Foreign Lawyer (“RFL”).
53 See ABA Model Rules for the Licensing and Practice of Foreign Legal Consultants § 3 (f) (iv) the title “foreign legal consultant,” which may be used in conjunction with the words “admitted to the practice of law in [name of the foreign country of his or her admission to practice].”
55 See Rupp & Kim, supra note 16.
allows the registered FLCs use of the title “Lawyer.” For example, a New York lawyer, who wants to work as a registered FLC in Korea, may use the title “MiKukBub JaMunSa [American Law Consultant]” with “U.S. Attorney-at-Law, MiKuk ByeonHoSa [American Lawyer].”

4. Requirements for Establishing a Foreign Legal Consultant Firm in Korea

The Korean FLC Act enables U.S. or U.K. major law firms to establish Korean offices. Permission from the Korean Minister of Justice is required for the establishment of a foreign legal consultant firm in Korea. The Act requires a foreign law firm to have operated for at least five years where it was originally registered before opening an office in Korea. The foreign legal consultant firm consists of a FLC or FLCs approved by the Minister of Justice. The foreign law firm must have demonstrated credibility, expertise, and sufficient capability of surety for damages caused to the client in the event damages do occur. The chief of the foreign legal consultant firm must have practiced law for at least 7 years, including 3 years in the jurisdiction of his or her qualification.

IV. ETHICS ISSUES

A. Background

Korean FLC Act § 28 provides the following standards of legal ethics: The FLC should not act in a way that injures the dignity of the FLC. The FLC should not hide the truth or make false statements while he or she is rendering professional legal service. The FLC should observe the model code of legal ethics provided by the Korean Bar Association. Act § 30 binds the FLC to a duty of confidentiality. “A lawyer shall respect the confidentiality of all information that becomes known to the lawyer in the course of his or her professional activity, unless there is an exceptional clause to the general rule of law.”

The current bill of the Korean FLC Act does not provide guidelines for possible conflicts between the legal ethics of foreign and Korean jurisdictions. The International Bar Association (“IBA”), founded

56 Korean FLC Act § 27 (1).
57 Id. at § 15 (1).
58 Id. at § 16 (1) 1.
59 Id. § 16 (1) 1. 4.
60 Id. § 16 (1) 3.
61 Id. at § 28 (1).
62 Id. at § 28 (2).
63 Id. at § 28 (3).
64 Id. at § 30.
on February 17, 1947, developed IBA’s International Code of Ethics in 1956 to govern the behavior of lawyers in relation to their activities in other jurisdictions. Although IBA’s International Code of Ethics is not a mandatory regulation, the Code does provide a good guideline for professional conduct. IBA’s International Code of Ethics § 1 prescribes that, “a lawyer who undertakes professional work in a jurisdiction where he is not a full member of the local profession shall adhere to the standards of professional ethics in the jurisdiction in which he has been admitted.” According to the IBA article, the FLC shall observe both jurisdictions’ ethical standards. A FLC who is in Korea is easily subject to monitoring and/or observance of Korean legal ethics standards. The FLC’s original bar association, however, may encounter difficulty monitoring its members’ observance of legal ethics because of the FLC’s physical distance from the foreign country.

The non-mandatory character of the IBA’s international code of ethics and the physical distance from the foreign lawyers’ supervising authority may lead us to the discussion of establishing one common ethics code in the area of global legal practice. However, deep legal and cultural differences may disturb this hope of one common global ethics code. Even the United States does not have a unified legal ethics code that applies in all 50 states. Instead, the American Bar Association developed the Model Code of Professional Responsibility as a guideline for the states. As one commentator points out:

The ABA Model Rules of Professional Conduct are the primary influence on the rules of professional conduct governing lawyers in the United States. Forty-six states and the District of Columbia have adopted the Model Rules numbering system and most of the language suggested by the Model Rules. Although most jurisdictions have adopted some version of the ABA Model Rules, no state has adopted all of the ABA Model Rules.

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65 See IBA, About the IBA, http://www.ibanet.org/About_the_IBA/About_the_IBA.aspx (last visited Sept. 27, 2009).


67 Jamie Whitaker, Remediying Ethical Conflicts in Global Legal Market, 19 Geo. J. Legal Ethics 1079-1088 (2006) (discussing the potential conflict of legal ethics and suggesting the hope for common code of professional responsibility for cross border transactions and practice).

B. American Lawyers Who Are Not Qualified as FLCs

The drafters of the Korea FLC Act might be concerned about maintaining a proper level of professionalism and consistency in the legal market in the face of a growing class of licensed foreign individuals in practice. This concern is centered on the increasing number of foreign-licensed Korean nationals entering the Korean legal market that may not be fully qualified as registered FLCs. Korean nationals started to take a “back door” into the Korean legal profession after failing the notoriously difficult Korean bar exam, which had a passage rate of 4.2% in 2008.69 New York was the preferred destination among foreign law school graduates who failed the bar examination in their home jurisdiction. The New York State Board of Law Examiners announced that the passing rate for all foreign-educated candidates in the July 2008 New York Bar Examination was 44.9%.70 The prospect of earning a Master of Laws degree at a U.S. law school and taking the bar examination in New York to escape nearly impassable bar examinations in their home country attracts foreign law graduates to enroll in the graduate programs of U.S. law schools.71

Even with no additional legal education in the U.S., graduates of Handong International Law School in Pohang, Korea, are allowed to take the Tennessee bar examination without additional education in a U.S. law school.72 Many of Handong Law School’s successful candidates of the Tennessee bar exam work in Korea with a Tennessee bar license.73

The issue here is how Korea secures professional responsibility of Korean ethnic American lawyers who do not fulfill the requirements of a registered FLC in Korea. According to the Korean FLC Act § 4 (1), the Korean American lawyer who does not have three years experience in the U.S. may not qualify for the requirements of a registered FLC. The present hardships in the U.S. legal market, has caused American law firms to fire

69 The Ministry of Justice of Korea announced that 1,005 candidates successfully passed the 2008 Korean bar examination out of the 23,656 that took the exam, and the passing rate for the Korean bar exam was 4.2%. Ministry of Justice of Korea, The Statistics for 50th National Bar Examination, http://www.moj.go.kr/barexam (last visited Sept. 27, 2009).


their associates, partners, or cancel summer associate programs.\footnote{See Debra Weiss, \textit{White & Case Layoff ‘trifecta’ Distinction Came on Record-Setting Day}, ABA JOURNAL LAW NEWS NOW (Mar. 16, 2009), http://abajournal.com/news/white_case_layoff_trifecta_distinction_came_on_record-setting_day/ (last visited Sept. 27, 2009).} Under these circumstances, foreign law school graduates who are later admitted to LL.M. programs in U.S. law schools may have fewer opportunities in the U.S. legal market. A natural choice of Korean nationals would be to return to Korea. Therefore, most of them may not easily meet the requirement of three years experience. The top ten Korean law firms have already hired many ‘Kyo-Po [Korean American] lawyers.\footnote{See Je-Hoon Lee, \textit{Foreign Law Firms Can Open Law Offices In Korea After This September}, KOOKMIN DAILY NEWS PAPER, March 3, 2009, http://www.kukinews.com/news2/article/view.asp?page=1&gCode=kmi&arcid=092121157&cp=nv (last visited Sept. 27, 2009) [Hereinafter “Lee”].} Substantial numbers of U.S. LL.M. graduates have been hired as an in-house counsel in major global Korean corporations.

Although both American lawyers and Korean lawyers educated in the U.S. will not be permitted to work independently, they will still be substantially involved in the practice of law under the supervision of licensed Korean lawyers without appropriate supervision by the legal ethics authority in their home jurisdiction.

A myriad of issues arise with the assumption that the bar association of the FLC’s home jurisdiction can simply rely on the moral consciousness of its members or that legal ethics authorities of foreign countries must establish more proactive systems for checking and controlling their members’ observance of legal ethics standards. Currently, even New York, which has the largest number of members involved in foreign legal practice, does not have special rules to supervise and regulate its members’ overseas practices.\footnote{New York Rules of Professional Conduct Rule 8.5 (a) covers members’ general ethics obligations while the lawyers involve in multistate legal practice: “A lawyer admitted to practice in this state is subject to the disciplinary authority of this state, regardless of where the lawyer’s conduct occurs. A lawyer may be subject to the disciplinary authority of both this state and another jurisdiction where the lawyer is admitted for the same conduct.” See New York Rules of Professional Conduct (Effective Apr. 1, 2009), http://www.nysba.org/Content/NavigationMenu/ForAttorneys/ProfessionalStandardsforAttorneys/NYRulesofProfessionalConduct4109.pdf (last visited Nov. 14, 2009).}

One such issue that remains to be addressed is the incredible utility and contributions of Korean lawyers educated in the U.S. who do not meet the criteria to be registered as a FLC yet fulfill important roles in the area of international legal practice in Korea.\footnote{Free Trade Agreement is Prerequisite for Opening Legal Market in Korea, LEGAL TIMES (Dec. 15, 2006), http://www.legaltimes.co.kr/view.htm?UID=5338&keys=15&kind=menu_cod (last visited Sept. 27, 2009).} National competition is lost if
Korea does not use the experience and knowledge of these non-registered FLCs. Although three years of experience in the home jurisdiction is required to be a FLC, a foreign lawyer (including Korean citizens educated in the U.S.) may count up to two years’ legal experience in Korea related to their home jurisdiction to fulfill the three-year requirement. In that instance, a foreign lawyer who had at least one year experience in his home jurisdiction is still eligible to apply after working for at least two years as a non-registered FLC employee in Korea. A Korean-born American lawyer who does not have the years of legal experience in the U.S. will get the best benefit from the FLC Act article 4 (3).

V. CONCLUSION

Free-trade agreements with the U.S. and E.U. have somewhat forced an opening of the Korean legal market. Korea expects a partial loss of its legal market which has been traditionally owned by domestic law firms. Korea, however, must use the FLC system as an opportunity to upgrade its legal services to a global standard. The availability of global law firms in Korea may also provide foreign companies with a certain comfort factor that could further facilitate Korea’s longstanding desire for increased foreign investment activity. Because there is less possibility that foreign lawyers will pass the notorious Korean bar exam due to its notoriously low passage rate, the FLC system will provide increased opportunity for foreign lawyers who want to practice law related to their home jurisdiction in Korea. Last, but not least, the primary requirement for a FLC is that a foreign lawyer must have worked at least three years post-admission in their home jurisdiction unless the foreign lawyer meets the requirements under the Korean FLC Act article 4 (3).

VI. APPENDIX

Table 1: Number of Attorneys at top 10 Korea Law Firms

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<thead>
<tr>
<th>Name</th>
<th>Korean Lawyers</th>
<th>Foreign Lawyers</th>
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</thead>
<tbody>
<tr>
<td>1</td>
<td>Kim &amp; Chang</td>
<td>315</td>
</tr>
<tr>
<td>2</td>
<td>Bae, Kim &amp; Lee</td>
<td>176</td>
</tr>
<tr>
<td>3</td>
<td>Lee &amp; Ko</td>
<td>176</td>
</tr>
</tbody>
</table>

visited Sept. 27, 2009).

78 Id.

79 Korean FLC Act § 4 (3).

80 Id.

81 See Lee, supra note 75.
<table>
<thead>
<tr>
<th></th>
<th>Name</th>
<th>Korean Lawyers</th>
<th>Foreign Lawyers</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Samsung</td>
<td>68</td>
<td>106</td>
<td>174</td>
</tr>
<tr>
<td>2</td>
<td>LG</td>
<td>15</td>
<td>75</td>
<td>90</td>
</tr>
<tr>
<td>3</td>
<td>Hyundai-Kia Motors</td>
<td>4</td>
<td>55</td>
<td>59</td>
</tr>
<tr>
<td>4</td>
<td>SK</td>
<td>12</td>
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<td>GS</td>
<td>7</td>
<td>10</td>
<td>17</td>
</tr>
<tr>
<td>6</td>
<td>Posco</td>
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<td>13</td>
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<td>7</td>
<td>Hanhwa</td>
<td>10</td>
<td>1</td>
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</tr>
<tr>
<td>8</td>
<td>Hyundai Heavy Industry</td>
<td>4</td>
<td>4</td>
<td>8</td>
</tr>
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<td>9</td>
<td>KT</td>
<td>4</td>
<td>2</td>
<td>6</td>
</tr>
<tr>
<td>10</td>
<td>KumHo Asiana</td>
<td>-</td>
<td>6</td>
<td>6</td>
</tr>
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</table>

Table 2: Numbers of in-house attorneys of top 10 Korean Corporations