



**FILED**

**AUG - 8 2007** *YHC*

STATE BAR COURT  
CLERK'S OFFICE  
LOS ANGELES

HON. MARY ELIZABETH BULLOCK  
7225 NAVAJO RD. #224  
SAN DIEGO, CALIFORNIA 92119

**THE STATE BAR COURT**

**HEARING DEPARTMENT - LOS ANGELES**

6	STATE BAR COURT OF CALIFORNIA, OFFICE OF THE )	Case No.: No. 05-O-04727
7	CHIEF TRIAL COUNSEL, DEPUTY TRIAL COUNSEL, )	RESPONDENT RESPONSE TO NOTICE OF
8	ELI MORGANSTERN, PRESIDING JUDGE, HON. MILES, )	DISCIPLINARY CHARGES
9	1149 SOUTH HILL STREET, LOS ANGELES, )	
10	CALIFORNIA 90015-2299 )	
11	Petitioner, )	
12	and )	
13	HON. MARY ELIZABETH BULLOCK )	
14	7225 NAVAJO RD. #224 SAN DIEGO, CALIFORNIA )	
15	92119 )	
16	Respondent )	

This pleading is a timely and shall serve as a formal response to the California State Bar Court allegations brought against Respondent by Everett Butler for the following violations: Business and Professions Code, Sections 6068(a); 5 C.F.R. 7201.102; Rules of Professional Conduct 4-200(A); Rule 3-700(D)(2); and Business and Professions Code, section 6106.

**JURISDICTION**

Respondent admits to the jurisdictional statements as she was licensed to practice law in the State of California.

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2 **COUNT ONE**

3 Respondent denies Count One; sentence one, of paragraph 2 in its entirety.

4 Respondent admits to Count One paragraph 3 as she served as an administrative judge  
5 from June 1999 to February 2007.

6 Respondent denies Count One; of paragraph 4 in that Respondent met Butler on May  
7 23, 2005, at 4:45 P.M. PST. ; Respondent denies having any knowledge of what Lockhart  
8 stated to Butler in their conversation.

9 Respondent denies paragraph 4, sentence two as to time frame.

10 Respondent denies sentence one paragraph 5.

11 Respondent denies sentence two paragraph 5.

12 Respondent denies sentence two A.

13 Respondent denies sentence two B and C that monies were deposited for Attorney Fees  
14 and is unaware of check numbers due to never seeing the two checks. Respondent admits  
15 Butler deposited into Respondent's personal account two checks for personal loan  
16 request.

17 Respondent denies sentence two of 5 C.

18 Respondent denies paragraph six with the exception that Respondent was employed by  
19 the U.S. EEOC.

20 Respondent denies in its entirety paragraph 7.

21 Respondent admits to appearing telephonically, But not as Butler's attorney as alleged in  
22 paragraph 8.

23 Respondent admits paragraph 8 sentence mediation was attended by Butler and His  
24 attorney Lockhart.

25 Respondent denies paragraph 8 sentence two which Respondent had no personal  
26 knowledge of all mediation attendees.

27 Respondent admits paragraph 9 sentence one in that she receiving a correspondence from  
28 the Navy.

1 Respondent denied paragraph 9 sentence one representing Butler as told to the Navy on  
2 multiple occasions.

3 Respondent admits paragraph 9 sentences two.

4 Respondent denies paragraph 10 sentence one as Respondent was not Butler attorney.

5 Respondent admits paragraph 10 sentence two and three as She did receive an E-mail  
6 from Butler.

7 Respondent denies paragraph 11 in its entirety.

8 Respondent denies paragraph 12 in its entirety on Count One.

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11 **COUNT TWO**

12 Respondent denies the allegations of paragraph 13 in its entirety.

13 No Response from Respondent is necessary for paragraph 14.

14 Respondent denies being grossly negligent and admits knowing the prohibitions of  
15 representing anyone with a claim against the United States while an administrative judge  
16 as alleged in paragraph 15.

17 Respondent denies paragraph 16 in its entirety.

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20 **COUNT THREE**

21 Respondent denies paragraph 17 in its entirety.

22 No response is necessary from Respondent in paragraph 18.

23 Respondent denies accepting any money as legal fees as alleged in paragraph 19.

24 Respondent does not have perfect recall of Butler's letter via e-mail as the e-mails from  
25 Butler and Lockhart were intentionally erased from Respondent's computer *via* a third  
26 party and/or third parties.

27 Respondent denies representing Butler as paragraph 20, Count Three implies.

28 Respondent denies paragraph 21 in its entirety.

1  
2 **COUNT FOUR**

3 Respondent denies paragraph 22.

4 No response is required from Respondent for paragraph 23.

5 Respondent admits paragraph 24.

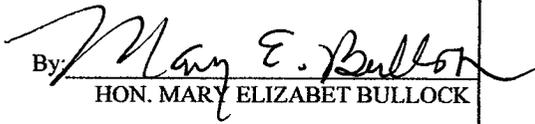
6 Respondent denies paragraph 25 in its entirety.

7 Respondent denies paragraph 26 in its entirety.  
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10 **NOTICE – TO PETITIONER**

11 **SENTENCE CONSTRUCTION CONTAINS MULTIPLE DECLARATORY STATEMENTS WHICH**  
12 **CANNOT BE APPROPRIATELY RESPONDED TO BY PETITIONER THROUGH THE ADMIT AND DENY**  
13 **PROCESS.**  
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20 Dated this 7<sup>th</sup> day of August, 2007

21  
22 By:   
23 HON. MARY ELIZABET BULLOCK  
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