

FILED

AUG 17 2011

STATE BAR COURT CLERK'S OFFICE  
SAN FRANCISCO

1 RONI DEUTCH  
2 4815 WATT AVE  
3 NORTH HIGHLANDS, CALIFORNIA 95660  
4 916-443-1080

5 RONI DEUTCH, IN PRO PER

8 STATE BAR COURT

9 HEARING DEPARTMENT-SAN FRANCISCO

07-0-11668

12 In the matter of:

) Case No.: ~~11-0-12999~~

14 RONI LYNN DEUTCH,

) ANSWER TO NOTICE OF

15 No. 152429

) DISCIPLINARY CHARGES

16 A Member of the State Bar

)

)

)

19 GENERAL DENIAL

20 Pursuant to 431.30 of the Code of Civil Procedure, Roni Lynn  
21 Deutch denies generally and specifically, each, every and all of  
22 the allegations contained in the State Bar of California's Notice  
23 of Disciplinary Charges on file herein.  
24

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1 FIRST AFFIRMATIVE DEFENSE

2 (Failure to State a Cause of Action)

3 As a separate and affirmative defense, Respondent alleges that  
4 said the State Bar's Notice of Disciplinary Charges fails to state  
5 facts sufficient to constitute a cause of action.  
6

7 SECOND AFFIRMATIVE DEFENSE

8 (Statute of Limitations)

9 As a separate and affirmative defense, Respondent alleges that  
10 the State Bar of California's Disciplinary Charges, and each of  
11 them, are barred by the applicable statute of limitations,  
12 including but not limited to, Business and Professions Code Section  
13 17208, and Code of Civil Procedure sections 337, 338, 339, 340 and  
14 343.  
15

16 THIRD AFFIRMATIVE DEFENSE

17 (Laches)

18 As a separate and affirmative defense, Respondent alleges that  
19 the State Bar of California is barred from their action against  
20 Respondent by reason of the doctrine of laches and undue delay in  
21 giving notice to Respondent of the matters alleged in the State Bar  
22 of California's Notice of Disciplinary Charges.  
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1 FOURTH AFFIRMATIVE DEFENSE

2 (Consent)

3 As a separate and affirmative defense, the State Bar of California  
4 consented or acquiesced to the acts of Respondent of which they now  
5 complain.  
6

7 FIFTH AFFIRMATIVE DEFENSE

8 (Estoppel)

9 As a separate and affirmative defense, the State Bar of  
10 California accepted and approved of Respondent's conduct over the  
11 past twenty years. Respondent relied on representations,  
12 communications and in action by the State Bar of California over  
13 the past twenty years. As such, the State Bar of California is  
14 estopped from asserting any claim based on Respondent's reliance on  
15 the State Bar of California's conduct.  
16

17 SIXTH AFFIRMATIVE DEFENSE

18 (Acts or Omissions of Others)

19 As a separate and affirmative defense, Respondent alleges that  
20 the conduct complained of, if any, were proximately contributed to  
21 or caused by the carelessness, negligence, faults or defects  
22 resulting from acts or omissions of other persons other than  
23 Respondent and were not caused in any way by Respondent.  
24  
25  
26  
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28

1 SEVENTH AFFIRMATIVE DEFENSE

2 (Avoidable Consequences)

3 As a separate and affirmative defense, Respondent alleges that  
4 the State Bar of California failed to take action against  
5 Respondent which would have avoided and or diminished all damages,  
6 if any.  
7

8 EIGHTH AFFIRMATIVE DEFENSE

9 (Willful Misconduct)

10 As a separate and affirmative defense, Respondent believes and  
11 alleges that the State Bar of California were guilty of willful  
12 misconduct and proximately caused and or contributed to the  
13 occurrence of events complained of in their Notice of Disciplinary  
14 Charges.  
15

16 NINTH AFFIRMATIVE DEFENSE

17 (Causation)

18 As a separate and affirmative defense, Respondent alleges that  
19 any alleged acts or omissions of Respondent, if any, did not  
20 constitute the legal and or proximate cause of the actions  
21 complained of in the State Bar of California Notice of Disciplinary  
22 Charges, which is specifically denied by Respondent.  
23  
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TENTH AFFIRMATIVE DEFENSE

(Avoidable Consequences)

As a separate and affirmative defense, Respondent alleges that the complaining witnesses failed to cooperate with Respondent which would have avoided and or diminished their injuries, if any.

ELEVENTH AFFIRMATIVE DEFENSE

(Conduct Not Unlawful)

As a separate and affirmative defense, Respondent alleges that the business practices and advertising put in issue by the State Bar of California are not unlawful, because Respondent complied with all laws alleged in the State Bar of California's Notice of Disciplinary Charges to have been violated.

TWELFTH AFFIRMATIVE DEFENSE

(Additional Affirmative Defense)

As a separate and affirmative defense, Respondent alleges that she has insufficient knowledge or information on which to form a belief as to whether there may be additional affirmative defenses. Respondent reserves the right to assert additional affirmative defenses as discovery indicates they are appropriate.

DATED: August 16, 2011

  
RONI LYNN DEUTCH  
In Pro Per

**PROOF OF SERVICE BY MAIL**  
**C.C.P. 1013a**

I declare that I am a resident of or employed in the County of Sacramento, California. I am over the age of 18 years and not a party to the within entitled cause. The name and address of my residence or business is 2810 Echo Way, Sacramento California 95821

I am readily familiar with the ordinary practice of the business of collecting, processing and depositing correspondence in the United States Postal Service and that the correspondence will be deposited the same day with postage thereon fully prepaid.

On August 16th, 2011, I served the Answer to Notice of Disciplinary Charges

on the parties listed below by placing a true copy thereof enclosed in a sealed envelope for collection and mailing in the United States Postal Service following ordinary business practices at Folsom, California addressed as follows:

MS. ROBIN BRUNE  
STATE BAR OF CALIFORNIA  
180 HOWARD STREET  
SAN FRANCISCO, CA 94105

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on August 16th, 2011, at Folsom, California.

Evelyn Fernandez  
(Type or print name)

  
(Signature)