PUBLIC MATTER – NOT DESIGNATED FOR PUBLICATION

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STATE BAR COURT
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STATE BAR COURT OF CALIFORNIA

REVIEW DEPARTMENT

In the Matter of	)	Case No. 08-O-10074
	)	
BRUCE MARTIN GREENFIELD,	)	OPINION AND ORDER
	)	
A Member of the State Bar, No. 80122.	)	
	)	

THE COURT.*

This case involves Bruce Martin Greenfield's persistent abuse of the bankruptcy process over nearly five years. The United States Bankruptcy Court for the Central District of California (Central District Bankruptcy Court) declared Greenfield a vexatious litigant due to his "long record of filing frivolous motions to harass [a bankruptcy] Trustee and delaying . . . state court litigation . . . ." The bankruptcy courts for the Central and Southern Districts of California have imposed more than $87,000 in sanctions on Greenfield, which he has failed to pay or report to the State Bar. For this conduct, a hearing judge found him culpable of maintaining unjust actions and failing to obey court orders and to report judicial sanctions. The judge recommended discipline including a two-year actual suspension, conditioned upon proof of rehabilitation and payment of restitution.

Both Greenfield and the Office of the Chief Trial Counsel of the State Bar (OCTC) seek review. Greenfield does not challenge the factual findings or analysis underlying his culpability for maintaining unjust actions or failing to comply with court orders. Instead, he argues that the Hearing Department decision is void due to the judge's erroneous assignment of aggravation for

*Before Purcell, P. J., Epstein, J., and Stovitz, J., retired Presiding Judge of the State Bar Court, serving as Review Judge Pro Tem by appointment of the California Supreme Court.

a prior record of discipline. He also contests the findings that he failed to report judicial sanctions. As for discipline, Greenfield claims the recommendation is excessive and the restitution order improper. OCTC supports the culpability findings, but submits that disbarment is necessary to curb Greenfield's "frivolous litigation tactics[, which] are a menace to the public and the courts."

We review the record independently (Cal. Rules of Court, rule 9.12), and adopt the culpability findings. We find error, though, in the hearing judge's discipline analysis, which focuses on Greenfield's violations of court orders. That analysis does not sufficiently address his pattern of employing abusive litigation strategies in bad faith, resulting in significant harm to the administration of justice. Greenfield's extensive misconduct, lack of insight into the wrongfulness of his behavior, and continued use of delay tactics and frivolous filings after being warned that such acts violate his ethical duties, persuade us that no sanction short of disbarment will prevent future misconduct.

I. PROCEDURAL BACKGROUND

Greenfield was admitted to practice law in California in 1978. On October 21, 2011, OCTC filed a Notice of Disciplinary Charges (NDC), charging him with one count of maintaining unjust actions (Bus. & Prof. Code, § 6068, subd. (c)[1]) and two counts each of failing to obey court orders (§ 6103) and to timely report judicial sanctions to the State Bar (§ 6068, subd. (o)(3)). After Greenfield failed to appear at his scheduled trial, the hearing judge entered his default and ordered him enrolled involuntarily as inactive, effective July 26, 2013. (§ 6007, subd. (e).) The judge later denied both Greenfield's motion to set aside the default and OCTC's petition for disbarment, but allowed limited relief from default to determine: (1) whether the

[1] All further references to sections are to the Business and Professions Code unless otherwise noted.

facts alleged in the NDC, and deemed admitted by virtue of the default, established culpability; and, if so, (2) the appropriate discipline. (Rules Proc. of State Bar, rules 5.82(2), 5.83(H)(3);[2] *In the Matter of Carver* (Review Dept. 2014) 5 Cal. State Bar Ct. Rptr. 348, 354 [hearing judge has wide discretion to fashion relief from default].)

The Hearing Department issued its decision on August 28, 2014. On November 21, 2014, OCTC filed a request for review; we also accepted Greenfield's request for plenary review, deemed filed as of December 1, 2014. (Rule 5.82(3); *In the Matter of Stansbury* (Review Dept. 2000) 4 Cal. State Bar Ct. Rptr. 103, 106, 108 [permitting plenary review despite default].)

II. GREENFIELD IS CULPABLE OF ALL CHARGES[3]

We adopt the hearing judge's culpability findings, which are supported by the record, as follows.

A. GREENFIELD MAINTAINED UNJUST ACTIONS IN BAD FAITH (COUNT 1)

In Count One, OCTC charged Greenfield with violating section 6068, subdivision (c),[4] by: (1) filing multiple bankruptcies and removals for improper purposes; (2) continuing to file notices of removal in order to delay a state court case even after a bankruptcy court put him on notice that such conduct constituted bad faith; and (3) filing baseless and improper counterclaims for indemnity in the Central District Bankruptcy Court, seeking relief from a state court

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[2] All further references to rules are to the Rules of Procedure of the State Bar unless otherwise noted.

[3] Our factual findings are based on the alleged facts, which are deemed admitted (rule 5.82 [where court enters member's default, facts alleged in NDC are deemed admitted, and "except as allowed by these rules or ordered by the Court, the member will not be permitted to participate further in the proceeding . . ."]), the hearing judge's findings, which we afford great weight (rule 5.155(A)), and the documentary evidence.

[4] Section 6068, subdivision (c), requires an attorney "[t]o counsel or maintain those actions, proceedings, or defenses only as appear to him or her legal or just . . . ."

judgment. The hearing judge found that Greenfield deliberately abused the bankruptcy process from 2003 through 2008, and is culpable as charged. We agree.

Greenfield represented debtor, Solutions Media, Inc. (Solutions), in a Chapter 7 bankruptcy, pending in the United States Bankruptcy Court for the Southern District of California (Southern District Bankruptcy Court). He also represented five defendants—Database Storage and Design, Inc. (Database), High Speed Music, Inc. (High Speed), Better Bandwidth, Inc. (Better Bandwidth), TYJ Consulting, Inc. (TYJ), and Focus Advertising, Inc. (Focus)—in a state court case, in which the Solutions bankruptcy trustee sought to avoid fraudulent conveyances.

Between October 2003 and June 2008, Greenfield pursued a litigation campaign intended to disrupt and delay the civil fraudulent transfer case and to harass the trustee. He did this by filing ten consecutive bankruptcy petitions in the Southern and Central Districts of California on behalf of defendants in the fraudulent transfer action and by repeatedly removing the fraudulent transfer action to the Southern and Central District Bankruptcy Courts, claiming it was a "core" proceeding arising under the Bankruptcy Code. (28 U.S.C. § 157(b)(1) [bankruptcy judges may hear and determine core proceedings arising under Bankruptcy Code].) Each petition automatically stayed the state court litigation until a bankruptcy court granted relief from the stay or dismissed the bankruptcy. Likewise, each removal delayed the fraudulent transfer case by divesting the state court of jurisdiction until a bankruptcy court remanded it.

1. Greenfield Filed Three Notices of Removal and One Bankruptcy Petition, which He Failed to Prosecute, in the Southern District Bankruptcy Court

In February 2006, Greenfield filed a bankruptcy petition in the Southern District Bankruptcy Court on behalf of Focus, which the court dismissed within a month after Greenfield failed to appear at the meeting of creditors. Also, from October 2003 through February 2006, Greenfield removed the fraudulent transfer case three times to the Southern District Bankruptcy

Court—twice on behalf of defendants to the action and once on behalf of GM Marketing, Inc. (GM), who was not a party. The bankruptcy court remanded the case after each removal, and entered an order on July 21, 2006, sanctioning Greenfield $20,000 for the improper removal on behalf of nonparty GM.[5]

2. Greenfield Filed Nine Bankruptcy Petitions and Six Notices of Removal in the Central District Bankruptcy Court, and Was Sanctioned $10,000 for Improper Tactics

From late June through early July 2005, Greenfield filed bankruptcies in the Central District Bankruptcy Court on behalf of Database, High Speed, Better Bandwidth, and TYJ. The court dismissed the High Speed, Better Bandwidth, and TYJ petitions by mid-October 2005 because Greenfield failed to appear at the meeting of creditors for each case. Greenfield also removed the fraudulent transfer action to the Central District Bankruptcy Court in late June 2005. Due to the removal, the state court trial set for July 1, 2005 could not go forward.

In early December 2005, the Central District Bankruptcy Court dismissed Database's bankruptcy petition, which it found consisted of "skeletal filings followed by planned nonappearance at the . . . meeting [of creditors] and then no real basis for bankruptcy . . . ." It also remanded the fraudulent transfer case to state court and imposed $10,000 in sanctions for fees and costs incurred as a result of the improper filings. The bankruptcy judge found Greenfield's actions constituted "a classic attempt to do an end-run around a State Court proceeding with which the Debtor did not agree." The judge initially imposed the sanctions only against Greenfield's client. But, in December 2007, the court amended its order "to include

[5] The court imposed the sanctions under Federal Rules of Bankruptcy Procedure (FRBP), rule 9011 (precluding filings that contain frivolous arguments or are filed for "any improper purpose, such as to harass or to cause unnecessary delay or needless increase in the cost of litigation").

Greenfield to be jointly and severally liable for the initial $10,000 in sanctions," after it found this conduct was part of an ongoing "scheme to delay the Superior Court action in bad faith."[6]

Undeterred, in August and September 2006, Greenfield filed five new bankruptcies in the Central District of California on behalf of Database, High Speed, Better Bandwidth, TYJ, and Focus, again imposing automatic stays of proceedings in the fraudulent transfer case. Once the bankruptcy court lifted the stays, Greenfield again removed the fraudulent transfer action to the Central District Bankruptcy Court in September 2007. On October 1, 2007, the court remanded the case, and found the removal was "in bad faith." Yet, between October 11 and October 15, 2007, Greenfield filed four new notices attempting again to remove the case to the Central District Bankruptcy Court. The court struck the notices of removal, and, on October 16, 2007, issued an order to show cause (OSC) why Greenfield should not be sanctioned for his repetitive filings, and referred him to the State Bar.

3. The Central District Bankruptcy Court Sanctioned Greenfield $67,901.02

On December 11, 2007, after the OSC hearing, the bankruptcy court found that Greenfield and his clients "repeatedly used the bankruptcy court to disrupt and delay state court discovery and trial" and concluded it was "an egregious abuse of the bankruptcy process." The court also found that the attempted removals after the October 1, 2007 order, and the fact that Greenfield only ceased filing notices of removal after the OSC issued, showed he and his clients "had knowledge of and intentionally proceeded with their bad faith conduct," which "increased the costs of litigation and unduly harassed [the] opposing party." Finally, the court found "Greenfield engaged in forum shopping by filing bankruptcies and removals in the Central

[6] The court imposed the sanctions under 28 U.S.C. § 1447(c) (court may require payment of costs and fees incurred due to removal), and 11 U.S.C. § 105(a) (court has inherent authority to "prevent an abuse of process").

District after his attempts in the Southern District were unsuccessful." The bankruptcy court sanctioned Greenfield and his clients $67,901.02.[7]

4. The Central District Bankruptcy Court Declared Greenfield a Vexatious Litigant

In November 2007, the state court entered judgment for the trustee in the fraudulent transfer case. In May 2008, Greenfield filed "Counter-claim(s) for Indemnity" in the Central District Bankruptcy Court, attempting to challenge the state court judgment. The bankruptcy court dismissed the claims as "baseless and procedurally improper," and declared Greenfield a vexatious litigant, based on the conduct described herein.[8]

5. Greenfield's Abusive Tactics Constituted Failure to Maintain Only Just Actions

Clear and convincing evidence establishes that Greenfield filed bankruptcies and repeatedly removed the fraudulent transfer case in bad faith, for purposes of delay and harassment. Then, after being found to have acted in bad faith and sanctioned, he initiated an unfounded challenge to the state court judgment in a bankruptcy court that had rejected the matter six times and plainly lacked jurisdiction to review a state court judgment. In this manner, Greenfield counseled or maintained unjust actions and is culpable as charged in Count One.

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[7] The court imposed the sanctions pursuant to FRBP, rule 9011, 28 U.S.C. § 1447(c), and 11 U.S.C. § 105(a).

[8] The record also contains a January 2008 default judgment entered in an adversary proceeding brought by the trustee against Greenfield, in which it appears the Southern District Bankruptcy Court similarly imposed sanctions and enjoined Greenfield's vexatious conduct. While the specific nature of the adversary proceeding is unclear, the judgment awards $150,000 in sanctions, inclusive of those imposed by the Central District Bankruptcy Court, and enjoins Greenfield from filing: (1) pleadings in any case relating to the Solutions bankruptcy, without leave of court; and (2) any bankruptcy on behalf of a defendant to the fraudulent transfer action.

B. GREENFIELD VIOLATED COURT ORDERS IMPOSING $87,901.02 IN SANCTIONS (COUNTS 2 & 3) AND FAILED TO REPORT SANCTIONS TO THE STATE BAR (COUNTS 4 & 5)

OCTC also charged that Greenfield willfully disobeyed court orders, in violation of section 6103,[9] by failing to pay the $67,901.02 and $20,000 sanctions, and violated section 6068, subdivision (o)(3),[10] by failing to timely report either sanction to the State Bar.[11] The hearing judge correctly found Greenfield culpable of these violations.

Greenfield received notice of the orders on or about July 26, 2006 and December 26, 2007, respectively, and has not paid any portion of the $87,901.02. Thus, he is culpable as charged in Counts Two and Three. (*In the Matter of Respondent Y* (Review Dept. 1998) 3 Cal. State Bar Ct. Rptr. 862, 867-868 [absent specific deadline, attorney must pay sanctions within reasonable time; failure to pay for over year after sanctions order issued was not reasonable].) Moreover, Greenfield never reported the $20,000 sanction to the State Bar and failed to report the $67,901.02 sanction until August 14, 2008, long after the 30-day reporting deadline expired. Although Greenfield asserts he timely reported the sanctions, his claim is unsupported by any evidence and is contrary to the NDC allegations, as deemed admitted by virtue of his default. He therefore is culpable as charged in Counts Four and Five. (*In the Matter of Respondent Y, supra,* 3 Cal. State Bar Ct. Rptr. at pp. 865, 867 [failure to report sanctions three months after respondent learned of order violated § 6068, subd. (o)(3)].)

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[9] Under this section, an attorney's "wilful disobedience or violation of an order of the court requiring him to do or forbear an act connected with or in the course of his profession, which he ought in good faith to do or forbear . . . constitute[s] cause[] for disbarment or suspension."

[10] Under this section, it is the duty of an attorney "[t]o report to the [State Bar], in writing, within 30 days of the time the attorney has knowledge of . . . [¶] . . . [¶] (3) [t]he imposition of judicial sanctions against the attorney, except for sanctions for failure to make discovery or monetary sanctions of less than one thousand dollars ($1,000)."

[11] OCTC did not charge Greenfield with failing to pay or report the $10,000 in sanctions imposed pursuant to the Central District Bankruptcy Court's December 2005 and 2007 orders.

III. SIGNIFICANT AGGRAVATION AND NO MITIGATION[12]

The hearing judge found Greenfield's misconduct aggravated, under standard 1.5(a) (prior record of discipline), based on a June 27, 2012 Central District Bankruptcy Court order imposing a five-year actual suspension on Greenfield. OCTC has not sought aggravation under standard 1.5(a)—either before the hearing judge or on appeal—and we conclude the hearing judge erred in finding it without any evidence of the factual basis for the suspension. (Rule 5.106; *In the Matter of Jeffers* (Review Dept. 1994) 3 Cal. State Bar Ct. Rptr. 211, 222-225 [no aggravation where facts of prior discipline are not in record].)[13] We assign no aggravating weight for this 2012 suspension, as the record does not establish Greenfield had notice of the misconduct underlying that proceeding until August 2011, years after the violations at issue here. (*In the Matter of Sklar* (Review Dept. 1993) 2 Cal. State Bar Ct. Rptr. 602, 619 [weight of aggravation for prior discipline record depends on whether respondent had opportunity to heed import of prior proceeding before committing misconduct at issue].)[14]

Greenfield's conduct in this court, and as reflected in the bankruptcy court discipline record, demonstrates a troubling lack of insight into the wrongfulness of the present violations.

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[12] Standard 1.5 requires OCTC to establish aggravating circumstances by clear and convincing evidence. Standard 1.6 requires Greenfield to meet the same burden to prove mitigation. Effective July 1, 2015, the Rules of Procedure of the State Bar, title IV, Standards for Attorney Sanctions for Professional Misconduct, were revised and renumbered. Because these requests for review were submitted for ruling after the July 1, 2015 effective date, we apply the revised version of the standards. All further references to standards are to the revised version of this source unless otherwise noted.

[13] Greenfield's claim that this error voids the hearing judge's decision is meritless. We may reverse any finding without invalidating the underlying proceedings. (Rule 5.155(a); Cal. Rules of Court, rule 9.12; *In the Matter of Gadda* (Review Dept. 2002) 4 Cal. State Bar Ct. Rptr. 416, 436 [Review Department opinion supersedes hearing judge's decision and remedies any errors].) By order dated April 3, 2015, we took judicial notice of court records relating to the 2012 suspension.

[14] While we do not assign aggravating weight for the 2012 discipline, we reject Greenfield's request for mitigation based on the "absence of any prior record" because he was in fact suspended in the bankruptcy court. (Std. 1.6(a).)

(Std. 1.5(k).) The Central District Bankruptcy Court disciplined Greenfield based on, inter alia, conduct comparable to that at issue here, such as failure to obey at least four court orders between 2009 and 2012 (including sanctions orders) and use of abusive litigation tactics from 2004 through 2012 in several cases besides those underlying this proceeding.[15] Greenfield also has delayed and disrupted State Bar Court proceedings. For example, he failed to appear at two Hearing Department trials and filed a frivolous notice of removal attempting to remove this case to the Central District Bankruptcy Court two weeks before a Hearing Department trial date.

We adopt the hearing judge's aggravation finding that Greenfield's attempted removal of this matter constituted failure to cooperate with the State Bar in these proceedings. (Std. 1.5(l).) The hearing judge found the "meritless and frivolous purported removal caused the State Bar and the bankruptcy court significant inconvenience and wasted the limited resources of both entities," and "shows that [Greenfield] continues to abuse the bankruptcy process."

We also agree with the hearing judge that Greenfield's misconduct is aggravated because it involved multiple acts of wrongdoing during years of pursuing unjust actions, in addition to his multiple violations of court orders and failures to report judicial sanctions. (Std. 1.5(b).)

In sum, we find significant aggregate aggravation and no mitigating circumstances.

IV. DISBARMENT IS NECESSARY AND APPROPRIATE[16]

Our disciplinary analysis begins with the standards, which "promote the consistent and uniform application of disciplinary measures." (*In re Silverton* (2005) 36 Cal.4th 81, 91, internal quotations and citation omitted.)

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[15] For example, the bankruptcy court found Greenfield filed: (1) repetitive notices of conversion in five bankruptcies from 2009 through 2012 (repeatedly trying to convert each from one chapter to another); and (2) multiple bankruptcies, which he failed to prosecute after they were assigned to judges he found unfavorable.

[16] The purpose of attorney discipline is not to punish the attorney, but to protect the public, the courts, and the legal profession; to preserve public confidence in the profession; and to maintain high professional standards for attorneys. (Std. 1.1.)

The hearing judge correctly determined that, at the time of the decision, former standard 2.8(a) was most relevant to Greenfield's conduct.[17] It provided that disbarment or actual suspension was appropriate for maintaining unjust actions *or* violating a court order. In assessing the proper discipline within that range, though, the judge focused on cases involving failures to obey court orders and did not afford due consideration to the decisional law imposing disbarment for attorneys who have pursued abusive litigation tactics and harmed the administration of justice.[18] (E.g., *In the Matter of Varakin* (Review Dept. 1994) 3 Cal. State Bar Ct. Rptr. 179 [disbarment appropriate where attorney pursued frivolous litigation over years for purpose of harassing ex-wife and others, and persisted in pattern, despite $80,000 sanctions]; *Rosenthal v. State Bar* (1987) 43 Cal.3d 612 [disbarment appropriate where attorney pursued litigation for purpose of delay, harassment, and obstructing administration of justice, and acted similarly during State Bar Court proceedings].)

In this case, we are guided by both the case law and new standard 2.9(a), effective July 1, 2015, which provides that disbarment is appropriate where a member "demonstrates a pattern" of counseling or maintaining frivolous claims or actions for improper purposes, causing significant harm to the administration of justice.[19] Greenfield engaged in a years-long pattern of harmful, vexatious litigation in violation of multiple court orders. (*Barnum v. State Bar* (1990) 52 Cal.3d

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[17] Former standard 2.8(b) (reproval is appropriate for failure to report judicial sanctions) also was applicable but did not determine the discipline analysis, as it provided a lesser sanction.

[18] The judge relied on two cases, *In the Matter of Respondent X* (Review Dept. 1997) 3 Cal. State Bar Ct. Rptr. 592, and *In the Matter of Respondent Y, supra,* 3 Cal. State Bar Ct. Rptr. 862, which are not comparable to this matter. In those cases, we privately reproved members who had no prior discipline and violated single court orders (and in *In the Matter of Respondent Y*, failed to report sanctions), where no aggravating circumstances were present.

[19] Standards 2.12(a) (disbarment or actual suspension is the presumed sanction for violation of a court order related to the member's practice of law) and 2.12(b) (reproval is the presumed sanction for failure to report judicial sanctions) also are applicable. Standard 1.7(a) directs that where multiple sanctions apply, the most severe shall be imposed. Thus, we focus on standard 2.9(a).

104, 112 ["Other than outright deceit, it is difficult to imagine conduct in the course of legal representation more unbefitting an attorney" than willful violation of court orders].) Given his "contemptuous attitude toward the disciplinary proceedings" (*Weber v. State Bar* (1988) 47 Cal.3d 492, 507 [member's attitude toward disciplinary proceedings is relevant to determination of appropriate sanction]) and his demonstrated unwillingness to curtail his misconduct, disbarment is necessary under standard 2.9(a) to protect the public, the courts, and the profession.

Finally, we reject Greenfield's challenges to the judge's restitution recommendation. Greenfield asserts that restitution for the unpaid sanctions is improper because the sanctions were compensatory and should not have been imposed by the bankruptcy courts. He is incorrect. First, the sanctions were imposed due to Greenfield's abuse of the bankruptcy process. Moreover, the bankruptcy courts' purpose and authority in imposing sanctions are not determinative to our analysis of whether restitution will serve our purposes of rehabilitation and deterring future misconduct. (*Brookman v. State Bar* (1988) 46 Cal.3d 1004, 1009.) We also reject Greenfield's argument that culpability for acts involving moral turpitude is a prerequisite for a restitution order. (*Sorensen v. State Bar* (1991) 52 Cal.3d 1036, 1044-1045 [restitution appropriate for protective and rehabilitative purposes where attorney violated section 6068, subdivision (c), causing financial losses to others].) Given Greenfield's lack of insight and refusal to conform to his ethical responsibilities, restitution is appropriate in this case.[20]

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[20] In his briefs, Greenfield suggests the sanctions may be discharged in bankruptcy. Any such discharge is irrelevant to our analysis. (*Brookman v. State Bar, supra,* 46 Cal.3d at p. 1009 [bankruptcy discharge of underlying subject does not foreclose restitution in discipline matter].)

V. RECOMMENDATION

We recommend that Bruce Martin Greenfield be disbarred from the practice of law in the State of California and that his name be stricken from the roll of attorneys admitted to practice in this state.

We further recommend that Greenfield must make restitution to the following individuals (or to the Client Security Fund to the extent of any payment from the Fund to any of them, in accordance with Business and Professions Code section 6140.5) and furnish satisfactory proof to the State Bar Office of Probation in Los Angeles:

(1) Gerald H. Davis, Chapter 7 Trustee, in the amount of $20,000 plus 10 percent interest per year from August 20, 2006;[21]

(2) Gerald H. Davis, Chapter 7 Trustee, in the amount of $58,661.02 plus 10 percent interest per year from January 10, 2008; and

(3) Robert Steele, counsel for Chapter 7 Trustee Gerald H. Davis, in the amount of $9,240 plus 10 percent interest per year from January 10, 2008.

We further recommend that he must comply with rule 9.20 of the California Rules of Court and perform the acts specified in subdivisions (a) and (c) of that rule, within 30 and 40 days, respectively, after the effective date of the Supreme Court order in this matter.

Finally, we recommend that costs be awarded to the State Bar in accordance with section 6086.10, such costs being enforceable as provided in section 6140.7 and as a money judgment.

VI. ORDER OF INVOLUNTARY INACTIVE ENROLLMENT

Pursuant to section 6007, subdivision (c)(4), and rule 5.111(D)(1), Greenfield is ordered enrolled inactive. The order of inactive enrollment is effective three days after service of this opinion. (Rule 5.111(D)(1).)

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[21] We set interest to begin accruing 30 days after the date of entry of each underlying sanctions order.

CERTIFICATE OF SERVICE

[Rules Proc. of State Bar; Rule 5.27(B); Code Civ. Proc., § 1013a(4)]

I am a Case Administrator of the State Bar Court. I am over the age of eighteen and not a party to the within proceeding. Pursuant to standard court practice, in the City and County of Los Angeles, on December 11, 2015, I deposited a true copy of the following document(s):

OPINION & ORDER FILED DECEMBER 11, 2015

in a sealed envelope for collection and mailing on that date as follows:

[X] by first-class mail, with postage thereon fully prepaid, through the United States Postal Service at Los Angeles, California, addressed as follows:

BRUCE M. GREENFIELD
1524 THORNHILL AVE.
WESTLAKE VILLAGE, CA 91361

BRUCE M. GREENFIELD
520 S SEPULVEDA BLVD
BEL AIR, CA 90077

[X] by interoffice mail through a facility regularly maintained by the State Bar of California addressed as follows:

ALLEN BLUMENTHAL, Enforcement, San Francisco

I hereby certify that the foregoing is true and correct. Executed in Los Angeles, California, on December 11, 2015.

Jasmine Guladzhyan
Case Administrator
State Bar Court