

PUBLIC MATTER

1 STATE BAR OF CALIFORNIA
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FILED
MAR 23 2015
 STATE BAR COURT
 CLERK'S OFFICE
 LOS ANGELES



11 STATE BAR COURT

12 HEARING DEPARTMENT - LOS ANGELES

13
 14 In the Matter of:

15 NINA RAE RINGGOLD,
 16 No. 133735,

17 and

18 AMY P. LEE,
 19 No. 222013

20 Members of the State Bar.
 21

) Case Nos: 09-O-13090; 10-O-05197;
) 13-O-12272; 14-O-00523; 14-O-00524;
) 14-O-03667;

) **NOTICE OF DISCIPLINARY CHARGES**

22 **NOTICE - FAILURE TO RESPOND!**

23 **IF YOU FAIL TO FILE A WRITTEN ANSWER TO THIS NOTICE**
 24 **WITHIN 20 DAYS AFTER SERVICE, OR IF YOU FAIL TO APPEAR AT**
 25 **THE STATE BAR COURT TRIAL:**

- 26 (1) **YOUR DEFAULT WILL BE ENTERED;**
 27 (2) **YOUR STATUS WILL BE CHANGED TO INACTIVE AND YOU**
 28 **WILL NOT BE PERMITTED TO PRACTICE LAW;**
 (3) **YOU WILL NOT BE PERMITTED TO PARTICIPATE FURTHER IN**
THESE PROCEEDINGS UNLESS YOU MAKE A TIMELY MOTION
AND THE DEFAULT IS SET ASIDE, AND;

1 (4) YOU SHALL BE SUBJECT TO ADDITIONAL DISCIPLINE.
2 SPECIFICALLY, IF YOU FAIL TO TIMELY MOVE TO SET ASIDE
3 OR VACATE YOUR DEFAULT, THIS COURT WILL ENTER AN
4 ORDER RECOMMENDING YOUR DISBARMENT WITHOUT
5 FURTHER HEARING OR PROCEEDING. SEE RULE 5.80 ET SEQ.,
6 RULES OF PROCEDURE OF THE STATE BAR OF CALIFORNIA.

7 The State Bar of California alleges:

8 JURISDICTION

9 1. NINA RAE RINGGOLD (“Respondent Ringgold”) was admitted to the practice of
10 law in the State of California on June 16, 1988, was a member at all times pertinent to these
11 charges, and is currently a member of the State Bar of California.

12 2. AMY P. LEE (“Respondent Lee”) was admitted to the practice of law in the State of
13 California on December 4, 2002, was a member at all times pertinent to these charges, and is
14 currently a member of the State Bar of California.

15 COUNT ONE

16 Case No. 09-O-13090
17 Business and Professions Code, section 6068(c)
18 [Maintaining an Unjust Action]

19 3. Between on or about December 19, 2005, and on or about July 27, 2009, Respondent
20 Ringgold failed to counsel or maintain such action, proceedings, or defenses only as appear to
21 Respondent Ringgold legal or just by filing on behalf of herself and others the following
22 appeals of court orders and a petition that were meritless, frivolous, filed for purposes of delay,
23 filed for improper purposes, filed while she continuously refused to obey the probate court’s
24 valid orders, filed on behalf of a party that had no standing, and filed on behalf of a party
25 without that party’s knowledge and consent, pertaining to the litigation of *In Re Aubry Family*
26 *Trust*, Los Angeles County Superior Court, case number PP00521, in willful violation of
27 Business and Professions Code, section 6068(c):

28 A. Appellate case number B188155 filed on or about December 19, 2005, in the Court
of Appeal of the State of California for the Second Appellate District, Division Five;

B. Appellate case number B201148 filed on or about July 31, 2007, in the Court of
Appeal of the State of California for the Second Appellate District, Division Five;

1 C. Petition for (1) Order to Show Cause re: Contempt, (2) Issuance of Citation, (3)
2 Suspension and Removal of Trustee, (4) Immediate Issuance of Temporary
3 Restraining Order and Order to Show Cause for Preliminary Injunction, (5)
4 Permanent Injunction, (6) Partition by Appraisal or Sale, (6) Constitutional Rights
5 Violation, (7) Surcharge (PC § 859), (8) Breach of Trust, (9) Reimbursement and
6 Constructive Trust, Los Angeles County Superior Court, case number PP005201,
7 filed on or about October 12, 2007;

8 D. Appellate case number B202858 filed on or about October 17, 2007, in the Court of
9 Appeal of the State of California for the Second Appellate District, Division Five;

10 E. Appellate case number B203110 filed on or about October 26, 2007, in the Court of
11 Appeal of the State of California for the Second Appellate District, Division Five;

12 F. Appellate case number B203814 filed on or about November 13, 2007, in the Court
13 of Appeal of the State of California for the Second Appellate District, Division Five;

14 G. Appellate case number B204931 filed on or about December 31, 2007, in the Court
15 of Appeal of the State of California for the Second Appellate District, Division Five;

16 H. Appellate case number B210169 filed on or about July 30, 2008, in the Court of
17 Appeal of the State of California for the Second Appellate District, Division Five;

18 I. Appellate case number B212797 filed on or about December 1, 2008, in the Court of
19 Appeal of the State of California for the Second Appellate District, Division Five;

20 J. Appellate case number B217001 filed on or about June 16, 2011, in the Court of
21 Appeal of the State of California for the Second Appellate District, Division Five;

22 K. Appellate case number B217816 filed on or about July 20, 2009, in the Court of
23 Appeal of the State of California for the Second Appellate District, Division Five;
24 and

25 L. Appellate case number B217890 filed on or about July 27, 2009, in the Court of
26 Appeal of the State of California for the Second Appellate District, Division Five.

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COUNT TWO

Case No. 09-O-13090
Business and Professions Code, section 6103
[Failure to Obey a Court Order]

4. Respondent Ringgold disobeyed or violated an order of the court requiring Respondent Ringgold to do or forbear an act connected with or in the course of Respondent Ringgold's profession which Respondent Ringgold ought in good faith to do or forbear by failing to comply with the December 16, 2005 order requiring Respondent Ringgold to turn over to the trustee within 48 hours all documents and keys necessary to transfer possession of Aubry Trust property to the trustee, in *In Re Aubry Family Trust*, Los Angeles County Superior Court, case number PP00521, in willful violation of Business and Professions Code, section 6103.

COUNT THREE

Case No. 09-O-13090
Business and Professions Code, section 6103
[Failure to Obey a Court Order]

5. Respondent Ringgold disobeyed or violated an order of the court requiring Respondent Ringgold to do or forbear an act connected with or in the course of Respondent Ringgold's profession which Respondent Ringgold ought in good faith to do or forbear by failing to comply with the November 13, 2009 order requiring her to pay sanctions in the amount of \$10,720 to Andre-Paul Summers Chaussier, in the matter of *Justin Ringgold-Lockhart, et al. v. Myer Sankary, et al.*, Court of Appeal of the State of California for the Second Appellate District, Division Five, case numbers B217816 and B217890, in willful violation of Business and Professions Code, section 6103.

COUNT FOUR

Case No. 09-O-13090
Business and Professions Code, section 6103
[Failure to Obey a Court Order]

6. Respondent Ringgold disobeyed or violated an order of the court requiring Respondent Ringgold to do or forbear an act connected with or in the course of Respondent Ringgold's profession which Respondent Ringgold ought in good faith to do or forbear by

1 failing to comply with the February 18, 2009 order requiring her to obtain permission from the
2 court before filing any new litigation pursuant to Code of Civil Procedure section 391(b)(3),
3 when she thereafter filed an appeal on or about May 5, 2010, in the Court of Appeal of the State
4 of California for the Second Appellate District, Division Five, Case number B224294, in willful
5 violation of Business and Professions Code, section 6103.

6 COUNT FIVE

7 Case No. 09-O-13090
8 Business and Professions Code, section 6103
9 [Failure to Obey a Court Order]

10 7. Respondent Ringgold disobeyed or violated an order of the court requiring
11 Respondent Ringgold to do or forbear an act connected with or in the course of Respondent
12 Ringgold's profession which Respondent Ringgold ought in good faith to do or forbear by
13 failing to comply with the February 18, 2009 order requiring her to obtain permission from the
14 court before filing any new litigation pursuant to Code of Civil Procedure section 391(b)(3),
15 when she filed an appeal on or about January 28, 2011, in the Court of Appeal of the State of
16 California for the Second Appellate District, Division Five, Case number B230614, in willful
17 violation of Business and Professions Code, section 6103.

18 COUNT SIX

19 Case No. 09-O-13090
20 Business and Professions Code, section 6103
21 [Failure to Obey a Court Order]

22 8. Respondent Ringgold disobeyed or violated an order of the court requiring
23 Respondent Ringgold to do or forbear an act connected with or in the course of Respondent
24 Ringgold's profession which Respondent Ringgold ought in good faith to do or forbear by
25 failing to comply with the February 18, 2009 order requiring her to obtain permission from the
26 court before filing any new litigation pursuant to Code of Civil Procedure section 391(b)(3),
27 when she filed an appeal on or about May 31, 2011, in the Court of Appeal of the State of
28 California for the Second Appellate District, Division Five, Case number B233475, in willful
violation of Business and Professions Code, section 6103.

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1 extend the length of the litigation for the other beneficiaries and opposing parties, filed 11
2 meritless appeals of court orders, pursued a meritless petition for an order to show cause,
3 violated the court imposed Code of Civil Procedure section 391(b)(3) "pre-filing requirement"
4 three times by filing appeals without first obtaining the court's permission, refused to pay any
5 portion of any court-ordered sanctions in the *In Re Aubry Family Trust* matter since November
6 13, 2009, appeared for a party without authority by filing an appeal without the party's
7 knowledge and consent for the purpose of increasing costs and waste of time and court
8 resources and through all these means and methods Respondent Ringgold thereby committed an
9 act or acts involving moral turpitude, dishonesty or corruption in willful violation of Business
10 and Professions Code, section 6106.

11 COUNT TEN

12 Case No. 10-O-05197
13 Business and Professions Code, section 6068(c)
14 [Maintaining an Unjust Action]

15 12. Between in or about December, 2009, and on or about January 13, 2010, Respondent
16 Ringgold failed to counsel or maintain such action, proceedings, or defenses only as appear to
17 Respondent Ringgold legal or just by filing on behalf of her respective client ASAP Copy and
18 Print, the following amended complaints in the matter of *ASAP Copy and Print v. Canon*
19 *Business Solutions-West, et al.*, Los Angeles County Superior Court, Case number PC043358,
in willful violation of Business and Professions Code, section 6068(c):

- 20 A. First Amended cross complaint in the *ASAP Copy and Print v. Canon Business*
21 *Solutions-West, et al.*, filed in or about December 2009;
22 B. Fifth Amended complaint in the *ASAP Copy and Print v. Canon Business Solutions-*
23 *West, et al.*, filed on or about January 13, 2010;

24 COUNT ELEVEN

25 Case No. 10-O-05197
26 Business and Professions Code, section 6068(o)(3)
27 [Failure to Report Judicial Sanctions]

28 13. Respondent Ringgold failed to report to the agency charged with attorney discipline,
in writing, within 30 days of the time Respondent Ringgold had knowledge of the imposition of

1 any judicial sanctions against Respondent Ringgold by failing to report to the State Bar the
2 \$8,200 in sanctions that the court imposed on Respondent Ringgold, on or about March 23,
3 2010, in the matter of *ASAP Copy and Print v. Canon Business Solutions-West, et al.*, Los
4 Angeles Superior Court, Case number PC043358, in willful violation of Business and
5 Professions Code section, 6068(o)(3).

6 COUNT TWELVE

7 Case No. 10-O-05197
8 Business and Professions Code, section 6068(o)(3)
9 [Failure to Report Judicial Sanctions]

10 14. Respondent Ringgold failed to report to the agency charged with attorney discipline,
11 in writing, within 30 days of the time Respondent Ringgold had knowledge of the imposition of
12 any judicial sanctions against Respondent Ringgold by failing to report to the State Bar the
13 \$5,966.37 in sanctions that the court imposed on Respondent Ringgold, on or about March 24,
14 2010, in the matter of *ASAP Copy and Print v. Canon Business Solutions-West, et al.*, Los
15 Angeles Superior Court, Case number PC043358, in willful violation of Business and
16 Professions Code section, 6068(o)(3).

17 COUNT THIRTEEN

18 Case No. 10-O-05197
19 Business and Professions Code, section 6068(o)(3)
20 [Failure to Report Judicial Sanctions]

21 15. Respondent Ringgold failed to report to the agency charged with attorney discipline,
22 in writing, within 30 days of the time Respondent Ringgold had knowledge of the imposition of
23 any judicial sanctions against Respondent Ringgold by failing to report to the State Bar the
24 \$4,050 in sanctions that the court imposed on Respondent Ringgold, on or about March 25,
25 2010, in the matter of *ASAP Copy and Print v. Canon Business Solutions-West, et al.*, Los
26 Angeles Superior Court, Case number PC043358, in willful violation of Business and
27 Professions Code section, 6068(o)(3).

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COUNT FOURTEEN

Case No. 10-O-05197
Business and Professions Code, section 6103
[Failure to Obey a Court Order]

16. Respondent Ringgold disobeyed or violated an order of the court requiring Respondent Ringgold to do or forbear an act connected with or in the course of Respondent Ringgold's profession which Respondent Ringgold ought in good faith to do or forbear by failing to pay at any time, the \$8,200 sanction issued on March 23, 2010 or the \$5,966.37 sanction issued on March 24, 2010 or the \$4,050 sanction issued on March 25, 2010, in the matter of *ASAP Copy and Print v. Canon Business Solutions-West, et al.*, Los Angeles Superior Court, Case number PC043358, in willful violation of Business and Professions Code, section 6103.

COUNT FIFTEEN

Case No. 13-O-12272
Business and Professions Code, section 6068(c)
[Maintaining an Unjust Action]

17. Between on or about November 28, 2012, and on or about January 24, 2013, Respondent Ringgold failed to counsel or maintain such action, proceedings, or defenses only as appear to Respondent Ringgold legal or just by filing on behalf of her respective client ASAP Copy and Print, a notice of removal in the matter of *ASAP Copy and Print v. Canon Business Solutions-West, et al.*, in case number CV 12-10165-ABC (PJWx), United States District Court for the Central District of California (Western Division-Los Angeles), in willful violation of Business and Professions Code, section 6068(c).

COUNT SIXTEEN

Case No. 13-O-12272
Business and Professions Code, section 6068(o)(3)
[Failure to Report Judicial Sanctions]

18. Respondent Ringgold failed to report to the agency charged with attorney discipline, in writing, within 30 days of the time Respondent Ringgold had knowledge of the imposition of any judicial sanctions against Respondent Ringgold by failing to report to the State Bar the \$8,895 in sanctions that the court imposed on Respondent Ringgold, on or about March 25,

1 2010, in the matter of *ASAP Copy and Print v. Canon Business Solutions-West, et al.*, in case
2 number CV 12-10165-ABC (PJWx), United States District Court for the Central District of
3 California (Western Division-Los Angeles), in willful violation of Business and Professions
4 Code section, 6068(o)(3).

5 COUNT SEVENTEEN

6 Case No. 13-O-12272
7 Business and Professions Code, section 6103
8 [Failure to Obey a Court Order]

9 19. Respondent Ringgold disobeyed or violated an order of the court requiring
10 Respondent Ringgold to do or forbear an act connected with or in the course of Respondent
11 Ringgold's profession which Respondent Ringgold ought in good faith to do or forbear by
12 failing to pay at any time, the \$8,895 sanction issued on April 24, 2013, in the matter of *ASAP*
13 *Copy and Print v. Canon Business Solutions-West, et al.*, in case number CV 12-10165-ABC
14 (PJWx), United States District Court for the Central District of California (Western Division-
Los Angeles), in willful violation of Business and Professions Code, section 6103.

15 COUNT EIGHTEEN

16 Case No. 14-O-03667
17 Business and Professions Code, section 6068(c)
18 [Maintaining an Unjust Action]

19 20. Between on or about December 19, 2011 and on or about March 4, 2014,
20 Respondent Ringgold failed to counsel or maintain such action, proceedings, or defenses only
21 as appear to Respondent Ringgold legal or just by filing on behalf of her respective client ASAP
22 Copy and Print, frivolous appeals of six post-judgment orders made on August 4, August 26,
23 October 18, November 4, and November 30, 2011, in the matter of *ASAP Copy and Print v.*
24 *Canon Business Solutions-West, et al.*, in appellate case number B238144 filed on or about
25 March 4, 2014, in the Court of Appeal of the State of California for the Second Appellate
26 District, Division Two, seeking appellate review of matters that were previously and finally
27 decided in three prior appeals by Respondent Ringgold to the same Court of Appeal, in willful
violation of Business and Professions Code, section 6068(c) .

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COUNT NINETEEN

Case No. 14-O-03667
Business and Professions Code, section 6103
[Failure to Obey a Court Order]

21. Respondent Ringgold disobeyed or violated an order of the court requiring Respondent Ringgold to do or forbear an act connected with or in the course of Respondent Ringgold's profession which Respondent Ringgold ought in good faith to do or forbear by failing to pay at any time, the \$8,000 sanction issued on March 4, 2014, in the matter of *ASAP Copy and Print v. Canon Business Solutions-West, et al.*, in appellate case number B238144, Court of Appeal of the State of California for the Second Appellate District, Division Two, in willful violation of Business and Professions Code, section 6103.

COUNT TWENTY

Case Nos. 14-O-00523 and 14-O-00524
Business and Professions Code, section 6068(c)
[Maintaining an Unjust Action]

22. Between on or about December 6, 2012, and on or about November 12, 2013, Respondent Ringgold and Respondent Lee failed to counsel or maintain such action, proceedings, or defenses only as appear to Respondent Ringgold and Respondent Lee legal or just by filing on behalf of their respective clients Marian Turner, Lisa Turner and Cornelius Turner, the following notices of removal in the matters of *Cornelius Turner, et al. v. Hartford Casualty Insurance Company, et al.*, Los Angeles County Superior Court, Case Number BC463639; *Lisa Turner, et al. v. Hartford Casualty Insurance Company, et al.*, Los Angeles County Superior Court, Case Number BC463850; and *Marian Turner, et al. v. Hartford Casualty Insurance Company, et al.*, Los Angeles County Superior Court, Case Number BC474698, in willful violation of Business and Professions Code, section 6068(c):

A. Notice of removal, Case Number CV 12-10434-PA (Ex) filed on or about December 6, 2012, in the United States District Court for the Central District of California (Western Division-Los Angeles); and

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1 B. Notice of removal, Case Number CV 13-8361 PA (Ex) filed on or about November
2 12, 2013, in the United States District Court for the Central District of California
3 (Western Division-Los Angeles).

4 COUNT TWENTY-ONE

5 Case Nos. 14-O-00523 and 14-O-00524
6 Business and Professions Code, section 6103
7 [Failure to Obey a Court Order]

8 23. Respondent Ringgold and Respondent Lee disobeyed or violated an order of the
9 court requiring Respondent Ringgold and Respondent Lee to do or forbear an act connected
10 with or in the course of Respondent Ringgold and Respondent Lee's profession which
11 Respondent Ringgold and Respondent Lee ought in good faith to do or forbear by failing to
12 comply with the January 17, 2014 order requiring Respondent Ringgold and Respondent Lee to
13 pay, jointly and severally, sanctions in the amounts of \$6,050 to counsel for The Rule
14 Company, Incorporated Defendants within 30 days of the January 17, 2014 order, and \$5,680 to
15 counsel for Hartford Casualty Insurance Company within 30 days of the January 17, 2014 order,
16 in the matter of *Marian Turner, et al. v. Hartford Casualty Insurance Company, et al.*, United
17 States District Court for the Central District of California (Western Division-Los Angeles),
18 Case Number CV 13-8361 PA (Ex), in willful violation of Business and Professions Code,
19 section 6103.

20 COUNT TWENTY-TWO

21 Case No. 14-O-00524
22 Business and Professions Code, section 6068(o)(3)
23 [Failure to Report Judicial Sanctions]

24 24. Respondent Lee failed to report to the agency charged with attorney discipline, in
25 writing, within 30 days of the time Respondent Lee had knowledge of the imposition of any
26 judicial sanctions against Respondent Lee by failing to report to the State Bar the \$6,050 and
27 \$5,680 in sanctions that the court imposed on Respondent Ringgold and Respondent Lee,
28 jointly and severally, on or about January 17, 2014, in the matter of *Marian Turner, et al. v.*
Hartford Casualty Insurance Company, et al., United States District Court for the Central
District of California (Western Division-Los Angeles), Case Number CV 13-8361 PA (Ex), in

1 willful violation of Business and Professions Code section, 6068(o)(3) .

2 **NOTICE - INACTIVE ENROLLMENT!**

3 **YOU ARE HEREBY FURTHER NOTIFIED THAT IF THE STATE BAR**
4 **COURT FINDS, PURSUANT TO BUSINESS AND PROFESSIONS CODE**
5 **SECTION 6007(c), THAT YOUR CONDUCT POSES A SUBSTANTIAL**
6 **THREAT OF HARM TO THE INTERESTS OF YOUR CLIENTS OR TO**
7 **THE PUBLIC, YOU MAY BE INVOLUNTARILY ENROLLED AS AN**
8 **INACTIVE MEMBER OF THE STATE BAR. YOUR INACTIVE**
9 **ENROLLMENT WOULD BE IN ADDITION TO ANY DISCIPLINE**
10 **RECOMMENDED BY THE COURT.**

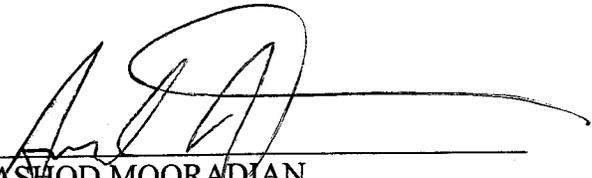
11 **NOTICE - COST ASSESSMENT!**

12 **IN THE EVENT THESE PROCEDURES RESULT IN PUBLIC**
13 **DISCIPLINE, YOU MAY BE SUBJECT TO THE PAYMENT OF COSTS**
14 **INCURRED BY THE STATE BAR IN THE INVESTIGATION, HEARING**
15 **AND REVIEW OF THIS MATTER PURSUANT TO BUSINESS AND**
16 **PROFESSIONS CODE SECTION 6086.10.**

17 Respectfully submitted,

18 THE STATE BAR OF CALIFORNIA
19 OFFICE OF THE CHIEF TRIAL COUNSEL

20 DATED: March 23, 2015

21 By: 
22 ASHOD MOORADIAN
23 Senior Trial Counsel

DECLARATION OF SERVICE

by

U.S. FIRST-CLASS MAIL / U.S. CERTIFIED MAIL / OVERNIGHT DELIVERY / FACSIMILE-ELECTRONIC TRANSMISSION

CASE NUMBER(s): 09-O-13090; 10-O-05197; 13-O-12272; 14-O-00523; 14-O-00524; 14-O-03667

I, the undersigned, am over the age of eighteen (18) years and not a party to the within action, whose business address and place of employment is the State Bar of California, 845 South Figueroa Street, Los Angeles, California 90017, declare that:

- on the date shown below, I caused to be served a true copy of the within document described as follows:

NOTICE OF DISCIPLINARY CHARGES

By U.S. First-Class Mail: (CCP §§ 1013 and 1013(a)) - in accordance with the practice of the State Bar of California for collection and processing of mail, I deposited or placed for collection and mailing in the City and County of Los Angeles.

By U.S. Certified Mail: (CCP §§ 1013 and 1013(a))

By Overnight Delivery: (CCP §§ 1013(c) and 1013(d)) - I am readily familiar with the State Bar of California's practice for collection and processing of correspondence for overnight delivery by the United Parcel Service ('UPS').

By Fax Transmission: (CCP §§ 1013(e) and 1013(f)) Based on agreement of the parties to accept service by fax transmission, I faxed the documents to the persons at the fax numbers listed herein below. No error was reported by the fax machine that I used. The original record of the fax transmission is retained on file and available upon request.

(for U.S. First-Class Mail) in a sealed envelope placed for collection and mailing at Los Angeles, addressed to: (see below)

(for Certified Mail) in a sealed envelope placed for collection and mailing as certified mail, return receipt requested, Article No.: 9414 7266 9904 2010 0860 48 to Nina Rae Ringgold at Los Angeles, addressed to: (see below)

(for Certified Mail) in a sealed envelope placed for collection and mailing as certified mail, return receipt requested, Article No.: 9414 7266 9904 2010 0859 80 to Amy P. Lee at Los Angeles, addressed to: (see below)

(for Overnight Delivery) together with a copy of this declaration, in an envelope, or package designated by UPS, Tracking No.: addressed to: (see below)

Table with 4 columns: Person Served, Business-Residential Address, Person Served, Business-Residential Address. Rows include Nina Rae Ringgold and Amy P. Lee.

via inter-office mail regularly processed and maintained by the State Bar of California addressed to:

N/A

I am readily familiar with the State Bar of California's practice for collection and processing of correspondence for mailing with the United States Postal Service, and overnight delivery by the United Parcel Service ('UPS').

I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date on the envelope or package is more than one day after date of deposit for mailing contained in the affidavit.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed at Los Angeles, California, on the date shown below.

DATED: March 23, 2015

SIGNED: Charles C. Bagai Declarant