In the Matter of

Member No. 198512

A Member of the State Bar.

CHANCE EDWARD GORDON

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STATE BAR COURT OF CALIFORNIA

HEARING DEPARTMENT – LOS ANGELES

NOV 26 2012

STATE BAR COURT CLERK'S OFFICE

10-0- 05500 LOS ANGELES

CASE NO.: 12-TE-15580-RAP

RESPONSE TO NOTICE OF **DISCIPLINARY CHARGES**

RESPONSE TO NOTICE OF DISCIPLINARY CHARGES

JURISDICTION

1. Responding to Paragraph 1 of the Notice of Disciplinary Charges, Respondent admits the allegations contained in that paragraph.

- 2. Responding to Paragraph 2 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 3. Responding to Paragraph 3 of the Notice of Disciplinary Charges, Respondent admits the allegations contained in that paragraph.
- 4. Responding to Paragraph 4 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 5. Responding to Paragraph 5 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- Responding to Paragraph 6 of the Notice of Disciplinary Charges, Respondent 6. denies the allegations contained in that paragraph.

1	7.	Responding to Paragraph 7 of the Notice of Disciplinary Charges, Respondent	
2	denies the allegations contained in that paragraph.		
3	8.		
4		Responding to Paragraph 8 of the Notice of Disciplinary Charges, Respondent	
5	denies the allegations contained in that paragraph.		
6	9.	Responding to Paragraph 9 of the Notice of Disciplinary Charges, Respondent	
7	denies the allegations contained in that paragraph.		
8	COUNT 2		
9	10.	Responding to Paragraph 10 of the Notice of Disciplinary Charges, Respondent	
10	denies the allegations contained in that paragraph.		
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12	11.	Responding to Paragraph 11 of the Notice of Disciplinary Charges, Respondent	
13	denies the allegations contained in that paragraph.		
14	12.	Responding to Paragraph 12 of the Notice of Disciplinary Charges, Respondent	
15	denies the allegations contained in that paragraph.		
16	13.	Responding to Paragraph 13 of the Notice of Disciplinary Charges, Respondent	
17	denies the allegations contained in that paragraph.		
18	1		
19	14.	Responding to Paragraph 14 of the Notice of Disciplinary Charges, Respondent	
20	denies the allegations contained in that paragraph.		
21		COUNT 3	
22	15.	Responding to Paragraph 15 of the Notice of Disciplinary Charges, Respondent	
23	denies the allegations contained in that paragraph.		
24	16.	Responding to Paragraph 16 of the Notice of Disciplinary Charges, Respondent	
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26	denies the allegations contained in that paragraph.		
27	17.	Responding to Paragraph 17 of the Notice of Disciplinary Charges, Respondent	
28		2 RESPONSE TO NOTICE OF DISCIPLINARY CHARGES	

denies the allegations contained in that paragraph.

- 18. Responding to Paragraph 18 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 19. Responding to Paragraph 19 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 20. Responding to Paragraph 20 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

- 21. Responding to Paragraph 21 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 22. Responding to Paragraph 22 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 23. Responding to Paragraph 23 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 24. Responding to Paragraph 24 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 25. Responding to Paragraph 25 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 26. Responding to Paragraph 26 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 27. Responding to Paragraph 27 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
 - 28. Responding to Paragraph 28 of the Notice of Disciplinary Charges, Respondent

denies the allegations contained in that paragraph.

- 29. Responding to Paragraph 29 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 30. Responding to Paragraph 30 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 31. Responding to Paragraph 31 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

COUNT 5

- 32. Responding to Paragraph 32 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 33. Responding to Paragraph 33 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 34. Responding to Paragraph 34 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 35. Responding to Paragraph 35 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 36. Responding to Paragraph 36 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

- 37. Responding to Paragraph 37 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 38. Responding to Paragraph 38 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

- 39. Responding to Paragraph 39 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 40. Responding to Paragraph 40 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 41. Responding to Paragraph 41 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 42. Responding to Paragraph 42 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 43. Responding to Paragraph 43 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 44. Responding to Paragraph 44 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

- 45. Responding to Paragraph 45 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 46. Responding to Paragraph 46 of the Notice of Disciplinary Charges, Respondent admits the allegations contained in that paragraph.
- 47. Responding to Paragraph 47 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 48. Responding to Paragraph 48 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 49. Responding to Paragraph 49 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

- 50. Responding to Paragraph 50 of the Notice of Disciplinary Charges, Respondent admits the allegations contained in that paragraph.
- 51. Responding to Paragraph 51 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 52. Responding to Paragraph 52 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 53. Responding to Paragraph 53 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 54. Responding to Paragraph 54 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

- 55. Responding to Paragraph 55 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 56. Responding to Paragraph 56 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 57. Responding to Paragraph 57 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 58. Responding to Paragraph 58 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 59. Responding to Paragraph 59 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 60. Responding to Paragraph 60 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

- 61. Responding to Paragraph 61 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 62. Responding to Paragraph 62 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 63. Responding to Paragraph 63 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 64. Responding to Paragraph 64 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 65. Responding to Paragraph 65 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 66. Responding to Paragraph 66 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 67. Responding to Paragraph 67 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 68. Responding to Paragraph 68 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 69. Responding to Paragraph 69 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 70. Responding to Paragraph 70 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 71. Responding to Paragraph 71 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
 - 72. Responding to Paragraph 72 of the Notice of Disciplinary Charges, Respondent

denies the allegations contained in that paragraph.

- 73. Responding to Paragraph 73 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 74. Responding to Paragraph 74 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 75. Responding to Paragraph 75 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 76. Responding to Paragraph 76 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 77. Responding to Paragraph 77 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 78. Responding to Paragraph 78 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 79. Responding to Paragraph 79 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 80. Responding to Paragraph 80 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 81. Responding to Paragraph 81 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

- 82. Responding to Paragraph 82 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
 - 83. Responding to Paragraph 83 of the Notice of Disciplinary Charges, Respondent

denies the allegations contained in that paragraph.

84. Responding to Paragraph 84 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

COUNT 10

- 85. Responding to Paragraph 85 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 86. Responding to Paragraph 86 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 87. Responding to Paragraph 87 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 88. Responding to Paragraph 88 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 89. Responding to Paragraph 89 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 90. Responding to Paragraph 90 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

- 91. Responding to Paragraph 91 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 92. Responding to Paragraph 92 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 93. Responding to Paragraph 93 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

Respondent denies the allegations contained in that paragraph. Responding to Paragraph 105 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph. Responding to Paragraph 106 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph. Responding to Paragraph 107 of the Notice of Disciplinary Charges, Respondent admits the allegations contained in that paragraph. Responding to Paragraph 108 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph. Responding to Paragraph 109 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph. Responding to Paragraph 110 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph. Responding to Paragraph 111 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph. Responding to Paragraph 112 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph. Responding to Paragraph 113 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph. Responding to Paragraph 114 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

Respondent denies the allegations contained in that paragraph.

- 127. Responding to Paragraph 127 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 128. Responding to Paragraph 128 of the Notice of Disciplinary Charges,Respondent denies the allegations contained in that paragraph.
- 129. Responding to Paragraph 129 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 130. Responding to Paragraph 130 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 131. Responding to Paragraph 131 of the Notice of Disciplinary Charges,Respondent denies the allegations contained in that paragraph.
- 132. Responding to Paragraph 132 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 133. Responding to Paragraph 133 of the Notice of Disciplinary Charges,Respondent denies the allegations contained in that paragraph.
- 134. Responding to Paragraph 134 of the Notice of Disciplinary Charges,Respondent denies the allegations contained in that paragraph.
- 135. Responding to Paragraph 135 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 136. Responding to Paragraph 136 of the Notice of Disciplinary Charges,Respondent denies the allegations contained in that paragraph.
- 137. Responding to Paragraph 137 of the Notice of Disciplinary Charges,Respondent denies the allegations contained in that paragraph.

- 138. Responding to Paragraph 138 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 139. Responding to Paragraph 139 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 140. Responding to Paragraph 140 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 141. Responding to Paragraph 141 of the Notice of Disciplinary Charges,Respondent denies the allegations contained in that paragraph.
- 142. Responding to Paragraph 142 of the Notice of Disciplinary Charges,Respondent denies the allegations contained in that paragraph.
- 143. Responding to Paragraph 143 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 144. Responding to Paragraph 144 of the Notice of Disciplinary Charges,Respondent denies the allegations contained in that paragraph.
- 145. Responding to Paragraph 145 of the Notice of Disciplinary Charges,Respondent denies the allegations contained in that paragraph.
- 146. Responding to Paragraph 146 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 147. Responding to Paragraph 147 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 148. Responding to Paragraph 148 of the Notice of Disciplinary Charges,Respondent denies the allegations contained in that paragraph.

COUNT 16

- 149. Responding to Paragraph 149 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 150. Responding to Paragraph 150 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 151. Responding to Paragraph 151 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

COUNT 17

- 152. Responding to Paragraph 152 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 153. Responding to Paragraph 153 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 154. Responding to Paragraph 154 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 155. Responding to Paragraph 155 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 156. Responding to Paragraph 156 of the Notice of Disciplinary Charges,Respondent denies the allegations contained in that paragraph.

- 157. Responding to Paragraph 157 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
 - 158. Responding to Paragraph 158 of the Notice of Disciplinary Charges,

Respondent denies the allegations contained in that paragraph.

- 159. Responding to Paragraph 159 of the Notice of Disciplinary Charges,Respondent denies the allegations contained in that paragraph.
- 160. Responding to Paragraph 160 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 161. Responding to Paragraph 161 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 162. Responding to Paragraph 162 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 163. Responding to Paragraph 163 of the Notice of Disciplinary Charges,Respondent denies the allegations contained in that paragraph.
- 164. Responding to Paragraph 164 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

COUNT 19

- 165. Responding to Paragraph 165 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 166. Responding to Paragraph 166 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- 167. Responding to Paragraph 167 of the Notice of Disciplinary Charges,Respondent denies the allegations contained in that paragraph.
- 168. Responding to Paragraph 168 of the Notice of Disciplinary Charges,Respondent denies the allegations contained in that paragraph.

Responding to Paragraph 170 of the Notice of Disciplinary Charges, Responding to Paragraph 171 of the Notice of Disciplinary Charges, Responding to Paragraph 172 of the Notice of Disciplinary Charges, Responding to Paragraph 173 of the Notice of Disciplinary Charges, Responding to Paragraph 174 of the Notice of Disciplinary Charges, Responding to Paragraph 175 of the Notice of Disciplinary Charges, Responding to Paragraph 176 of the Notice of Disciplinary Charges, Responding to Paragraph 177 of the Notice of Disciplinary Charges, Responding to Paragraph 178 of the Notice of Disciplinary Charges, Responding to Paragraph 179 of the Notice of Disciplinary Charges, 17

- Responding to Paragraph 180 of the Notice of Disciplinary Charges,
- Responding to Paragraph 181 of the Notice of Disciplinary Charges,
- Responding to Paragraph 182 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.
- Responding to Paragraph 183 of the Notice of Disciplinary Charges,
- Responding to Paragraph 184 of the Notice of Disciplinary Charges,
- Responding to Paragraph 185 of the Notice of Disciplinary Charges,
- Responding to Paragraph 186 of the Notice of Disciplinary Charges,
- Responding to Paragraph 187 of the Notice of Disciplinary Charges,
- Responding to Paragraph 188 of the Notice of Disciplinary Charges,
- Responding to Paragraph 189 of the Notice of Disciplinary Charges,
 - Responding to Paragraph 190 of the Notice of Disciplinary Charges,

Responding to Paragraph 191 of the Notice of Disciplinary Charges, Responding to Paragraph 192 of the Notice of Disciplinary Charges, Responding to Paragraph 193 of the Notice of Disciplinary Charges, Responding to Paragraph 194 of the Notice of Disciplinary Charges, Responding to Paragraph 195 of the Notice of Disciplinary Charges, Responding to Paragraph 196 of the Notice of Disciplinary Charges, Responding to Paragraph 197 of the Notice of Disciplinary Charges, Responding to Paragraph 198 of the Notice of Disciplinary Charges, Responding to Paragraph 199 of the Notice of Disciplinary Charges, Responding to Paragraph 200 of the Notice of Disciplinary Charges,

	H		
1	212. Responding to Paragraph 212 of the Notice of Disciplinary Charges,		
2	Respondent denies the allegations contained in that paragraph.		
3			
4	213. Responding to Paragraph 213 of the Notice of Disciplinary Charges,		
5	Respondent denies the allegations contained in that paragraph.		
6	214. Responding to Paragraph 214 of the Notice of Disciplinary Charges,		
7	Respondent denies the allegations contained in that paragraph.		
8	COUNT 27		
9	215 Responding to Paragraph 215 of the Notice of Disciplinary Charges,		
1011	Respondent denies the allegations contained in that paragraph.		
12	216. Responding to Paragraph 216 of the Notice of Disciplinary Charges,		
13	Respondent denies the allegations contained in that paragraph.		
14	217. Responding to Paragraph 217 of the Notice of Disciplinary Charges,		
15	Respondent denies the allegations contained in that paragraph.		
16	218. Responding to Paragraph 218 of the Notice of Disciplinary Charges,		
17	Respondent denies the allegations contained in that paragraph.		
18	respondent deines the arregations contained in that paragraph.		
19	COUNT 28		
20	219. Responding to Paragraph 219 of the Notice of Disciplinary Charges,		
21	Respondent denies the allegations contained in that paragraph.		
22	220. Responding to Paragraph 220 of the Notice of Disciplinary Charges,		
23	Respondent denies the allegations contained in that paragraph.		
24	221. Responding to Paragraph 221 of the Notice of Disciplinary Charges,		
25	Respondent denies the allegations contained in that paragraph.		
26 27	222. Responding to Paragraph 222 of the Notice of Disciplinary Charges,		
28	21 RESPONSE TO NOTICE OF DISCIPLINARY CHARGES		

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PROOF OF SERVICE

I am a resident of Los Angeles. I am over the age of eighteen years and not a party to the within action; my business address is 121 W. Lexington Drive, Suite 214, Glendale, CA 91203

On November 20, 2012, I served the RESPONSE TO NOTICE OF DISCIPLINARY CHARGES on the interested parties in this action as follows:

Erin McKeown-Joyce, Esq THE STATE BAR OF CALIFORNIA 1149 South Hill Street, 4th Floor Los Angeles, CA 90015

Hon. Richard A. Platel
STATE BAR COURT OF CALIFORNIA
1149 South Hill Street, 5th Floor
Los Angeles, CA 90015

XX (BY MAIL) The envelope was mailed with postage thereon fully prepaid. I am "readily" familiar with the firm's practice of collection and processing correspondence for mailing. It is deposited with U.S. Postal Service on that same day in the ordinary course of business. I am aware that on motion of a party served, service is presumed invalid if the postal cancellation date or postage meter date is more than one day after date of deposit for mailing an affidavit.

(BY PERSONAL SERVICE) I delivered such envelope by hand to the office of the addressee.

YX Via Email to the addresses listed above.

Erin McKeown-Joyce, Esq.
THE STATE BAR OF CALIFORNIA
erin.joyce@calbar.ca.org

XX (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

(FEDERAL) I declare that I am employed in the office of a member of the bar of their court at whose direction the service was made.

November 20, 2012
DATE

CHANCE E. GORDON

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