

1 Ashkan Alex Motamedi (228384)  
2 25302 Las Bolsas  
3 Laguna Hills, CA 92653  
4 949.280.0218

**FILED**

**FEB 11 2013**

STATE BAR COURT  
CLERK'S OFFICE  
LOS ANGELES

5 In Pro Per,

6  
7 **STATE BAR COURT**

8 **HEARING DEPARMTNET - LOS ANGELES**

9  
10 In the Matter of:

CASE NO: 11-O-10854

11 ASHKAN ALEX MOTAMEDI,

12 A Member of the State Bar

13 -----  
14 **RESPONSE TO NOTICE OF  
DISCIPLINARY CHARGES**

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18 ASHKAN ALEX MOTAMEDI ("Respondent") hereby submits the following responses to the  
19 Notice of Disciplinary Charges ("NDC") in Case No. 11-O-10854, and reserves the right to  
20 raise at the time of trial all affirmative defenses, including laches, impossibility, and unclean  
21 hands, as well as all statutory defenses available under the Constitution and laws of the State  
22 of California. The allegations are vague and ambiguous.

23 Jurisdiction

24 1) Respondent admit the allegation as stated.

25 Rule of Professional Conduct, rule 3-110(A)

26 [Failure to Perform with Competence]

27 2) Respondent denies the allegations as stated.

28 3) Respondent does not admit or denies the allegations as stated.

- 1 4) Respondent admit the allegations as stated.  
2 5) Respondent does not admit or denies the allegations as stated.  
3 6) Respondent denies the allegations as stated herein. On information and belief, the  
4 name of the physician was referenced in the settlement breakdown.  
5 7) Respondent denies the allegations as stated herein.  
6 8) Respondent denies the allegations as stated herein.  
7 9) Respondent denies the allegations as stated herein.

8 Business and Professions Code, section 6068(m).

9 [Failure to Respond to Client Inquiries].

- 10 10) Respondent denies the allegations as stated. Respondent excluded from services any  
11 dispute with medical providers.  
12 11) Respondent denies the allegations as stated.  
13 12) Respondent denies the allegations as stated. Respondent did address client inquiry.

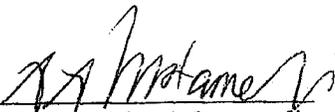
14 Rules of Professional Conduct, rule 4-100(B)(4)

15 [Failure to Pay Client Funds Promptly]

- 16 13) Respondent denies the allegations as stated.  
17 14) Respondent denies the allegation as stated.  
18 15) Respondent denies the allegation as stated. The bills were adjusted and satisfied.  
19 16) Respondent denies the allegation as stated.  
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21 Dated: February 8, 2013

22 Respectfully submitted,

23 By:   
24 Ashkan Alex Motamedi  
25 Respondent in Pro Per  
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DECLARATION OF SERVICE  
STATE OF CALIFORNIA, COUNTY OF ORANGE  
CASE NO. 11-O-10854

I am a Member of the California Bar and reside in the County of Orange, State of California. I am over the age of 18 and the respondent in the within action; my business address is as following: 25302 Las Bolsas Laguna Hills, Ca 92653

On February 8, 2013, I caused the foregoing document(s) described as:

**RESPONSES TO NOTICE OF DISCIPLINARY CHARGES**

to be served on the interested parties in this action as stated on the attached service list as follows:

By placing true copies thereof enclosed in sealed envelope(s) addressed as stated on the attached service list

— BY PERSONAL SERVICE (CCP §1011):

I caused to be delivered such envelope(s) or documents by hand to the offices of the addressee(s).

— BY (CCP §1013(c)&(d)):

I am "readily familiar" with the our practice of collection and processing correspondence for mailing via U.S mail. Under that practice such envelope(s) would be deposited at an authorized "drop off" box on that same day with delivery fees fully provided for at nearest location, Orange County, California, in the ordinary course of business.

By U.S. Certified Mail: in a sealed envelope placed for collection and mailing a certified mail, return receipt requested,

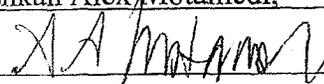
Article No: 420 90015 9502 8000 1388 3039 0003 09

Executed on February 08, 2013 at Orange County, California.

(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 this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

Ashkan Alex Motamedi,

Sign: 

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ATTACHED SERVICE LIST

Filing Clerk  
STATE BAR COURT  
1149 South Hill Street 5<sup>th</sup> Fl.  
Los Angeles, California 90015

Huge G. Radigan,  
Deputy Trial Counsel  
Office of the Chief Trial Counsel  
1149 South Hill Street  
Los Angeles, California 90015-  
2299

Attorneys for: