

**FILED**

**MAY 27 2014**

**STATE BAR COURT  
CLERK'S OFFICE  
LOS ANGELES**

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8 Defendant, in pro per

9 **STATE BAR COURT**

10 **HEARING DEPARTMENT – LOS ANGELES**

11 In the Matter of:

Case No. 212-O-13784

12 GREGORY ELROD GRANTHAM,  
13 No. 125732,

**ANSWER OF GREGORY ELROD  
GRANTHAM TO NOTICE OF  
DISCIPLINARY CHARGES**

14 A Member of the State Bar  
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18 Respondent, GREGORY ELROD GRANTHAM (“Grantham”), in pro per, in  
19 answer to the “Notice of Disciplinary Charges” (“Complaint”) filed by THE STATE  
20 BAR OF CALIFORNIA (“State Bar”), admits, denies, and alleges as follows:

- 21 1. In response to the first paragraph of the Complaint, Grantham admits the  
22 allegations contained therein.
- 23 2. In response to the second paragraph of the Complaint, Kellspin denies the  
24 allegations contained therein.

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25 **FIRST AFFIRMATIVE DEFENSE**

26 **(Voidable Order – Procured by Fraud on the Court)**

- 27 1. Grantham alleges that the subject Order to pay sanctions was procured by  
28 fraud on the Court and is voidable.

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**SECOND AFFIRMATIVE DEFENSE**

**(Unclean Hands)**

2. Grantham alleges that the State Bar is barred from any relief or recovery against Grantham, because of the Complaining Party (Raymond H. Aver's) unclean hands, which relates directly to the Order that is the subject of the State Bar's claim.

**THIRD AFFIRMATIVE DEFENSE**

**(Equitable Estoppel)**

3. Grantham alleges that the State Bar is barred from relief under the doctrine of equitable estoppel.

**FOURTH AFFIRMATIVE DEFENSE**

**(Collateral Estoppel)**

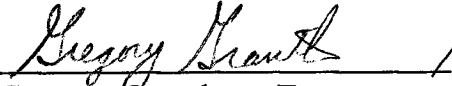
4. The State Bar is barred from any recovery against Grantham based on the doctrine of collateral estoppel.

**WHEREFORE**, Grantham requests that the Court grant judgment:

1. Dismissing the Complaint and denying all relief to the State Bar, and granting judgment on the Complaint in favor of Grantham;
2. Granting such other and further relief as may be permitted by law and as the Court may deem just and proper.

Respectfully submitted,  
LAW OFFICE OF GREGORY GRANTHAM

Dated: May 19, 2014

  
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Gregory Grantham, Esq.,  
In pro per, defendant

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PROOF OF SERVICE

STATE OF CALIFORNIA        )  
                                  )       ss  
COUNTY OF SAN DIEGO       )

I am over the age of 18 years and not a party to this action; my address is: P.O. BOX 322, OCEANSIDE, CA 92049.

On May 21, 2014, I served the foregoing document(s): **ANSWER OF GREGORY ELROD GRANTHAM TO NOTICE OF DISCIPLINARY CHARGES** on interested parties in this action by:

placing the true copies thereof enclosed in sealed envelopes addressed as stated on the attached mailing list.

by placing  a true copy thereof enclosed in sealed envelopes addressed as follows:

Anthony Garcia, Esq.  
Office of the Chief Trial Counsel  
845 So. Figueroa Street  
Los Angeles, CA 90017

BY MAIL: As follows: By placing true copies thereof enclosed in envelopes addressed as stated on attached Mailing List, and depositing said sealed envelopes with the U.S. Postal Service in the City of Oceanside, CA, for First Class Mail Delivery to said addressees with postage thereon fully prepaid.

BY ELECTRONIC TRANSMISSION: I transmitted a PDF version of this document by electronic mail to the party identified above using the e-mail address indicated beneath his or her name and address.

BY PERSONAL SERVICE: I personally served the envelope on the addressees named above.

(State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on May 21, 2014 at Oceanside, California.

  
\_\_\_\_\_  
Gregory Grantham