

1 CHANCE E. GORDON (SBN 198512)  
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**FILED**

**JAN 31 2013**

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

8 **STATE BAR COURT OF CALIFORNIA**  
9 **HEARING DEPARTMENT-LOS ANGELES**

11 In the Matter of

**CASE NO. 12-0-14013**

12 CHANCE EDWARD GORDON

**RESPONSE TO NOTICE OF  
DISCIPLINARY CHARGES**

14 Member No. 198512

15 A Member of the State Bar.



18 **RESPONSE TO DISCIPLINARY CHARGES**

19 **JURISDICTION**

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

23 **COUNT 1**

24 2. Responding to Paragraph 2 of the Notice of Disciplinary Charges, Respondent  
25 denies the allegations contained in that paragraph.

26 3. Responding to Paragraph 3 of the Notice of Disciplinary Charges, Respondent

1 denies the allegations contained in that paragraph.

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

7 6. Responding to Paragraph 6 of the Notice of Disciplinary Charges, Respondent  
8 denies the allegations contained in that paragraph.  
9

## 10 COUNT 2

11 7. Responding to Paragraph 7 of the Notice of Disciplinary Charges, Respondent  
12 denies the allegations contained in that paragraph.

13 8. Responding to Paragraph 8 of the Notice of Disciplinary Charges, Respondent  
14 denies the allegations contained in that paragraph.

15 9. Responding to Paragraph 9 of the Notice of Disciplinary Charges, Respondent  
16 denies the allegations contained in that paragraph.  
17

18 10. Responding to Paragraph 10 of the Notice of Disciplinary Charges, Respondent  
19 denies the allegations contained in that paragraph.

20 11. Responding to Paragraph 11 of the Notice of Disciplinary Charges, Respondent  
21 denies the allegations contained in that paragraph.

22 12. Responding to Paragraph 12 of the Notice of Disciplinary Charges, Respondent  
23 denies the allegations contained in that paragraph.  
24

25 13. Responding to Paragraph 13 of the Notice of Disciplinary Charges, Respondent  
26 denies the allegations contained in that paragraph.  
27

1           14. Responding to Paragraph 14 of the Notice of Disciplinary Charges, Respondent  
2 denies the allegations contained in that paragraph.

3           15. Responding to Paragraph 15 of the Notice of Disciplinary Charges, Respondent  
4 denies the allegations contained in that paragraph.

5           16. Responding to Paragraph 16 of the Notice of Disciplinary Charges, Respondent  
6 denies the allegations contained in that paragraph.

7           17. Responding to Paragraph 17 of the Notice of Disciplinary Charges, Respondent  
8 denies the allegations contained in that paragraph.

9           18. Responding to Paragraph 18 of the Notice of Disciplinary Charges, Respondent  
10 denies the allegations contained in that paragraph.

11           19. Responding to Paragraph 19 of the Notice of Disciplinary Charges, Respondent  
12 denies the allegations contained in that paragraph.

13           20. Responding to Paragraph 20 of the Notice of Disciplinary Charges, Respondent  
14 denies the allegations contained in that paragraph.

15           21. Responding to Paragraph 21 of the Notice of Disciplinary Charges, Respondent  
16 denies the allegations contained in that paragraph.

17           22. Responding to Paragraph 22 of the Notice of Disciplinary Charges, Respondent  
18 denies the allegations contained in that paragraph.

19           23. Responding to Paragraph 23 of the Notice of Disciplinary Charges, Respondent  
20 denies the allegations contained in that paragraph.

21           24. Responding to Paragraph 24 of the Notice of Disciplinary Charges, Respondent  
22 denies the allegations contained in that paragraph.

23           25. Responding to Paragraph 25 of the Notice of Disciplinary Charges, Respondent  
24 denies the allegations contained in that paragraph.

1 denies the allegations contained in that paragraph.

2 26. Responding to Paragraph 26 of the Notice of Disciplinary Charges, Respondent  
3 denies the allegations contained in that paragraph.

4 27. Responding to Paragraph 27 of the Notice of Disciplinary Charges, Respondent  
5 denies the allegations contained in that paragraph.

7 **COUNT 3**

8 28. Responding to Paragraph 28 of the Notice of Disciplinary Charges, Respondent  
9 denies the allegations contained in that paragraph.

10 29. Responding to Paragraph 29 of the Notice of Disciplinary Charges, Respondent  
11 denies the allegations contained in that paragraph.

12 30. Responding to Paragraph 30 of the Notice of Disciplinary Charges, Respondent  
13 denies the allegations contained in that paragraph.

14 31. Responding to Paragraph 31 of the Notice of Disciplinary Charges, Respondent  
15 denies the allegations contained in that paragraph.

16 32. Responding to Paragraph 32 of the Notice of Disciplinary Charges, Respondent  
17 admits the allegations contained in that paragraph.

18 33. Responding to Paragraph 33 of the Notice of Disciplinary Charges, Respondent  
19 denies the allegations contained in that paragraph.

20 34. Responding to Paragraph 34 of the Notice of Disciplinary Charges, Respondent  
21 denies the allegations contained in that paragraph.

22 35. Responding to Paragraph 35 of the Notice of Disciplinary Charges, Respondent  
23 denies the allegations contained in that paragraph.

24 36. Responding to Paragraph 36 of the Notice of Disciplinary Charges, Respondent  
25  
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27

1 denies the allegations contained in that paragraph.

2 37. Responding to Paragraph 37 of the Notice of Disciplinary Charges, Respondent  
3 denies the allegations contained in that paragraph.  
4

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

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8 **COUNT 4**

9 39. Responding to Paragraph 39 of the Notice of Disciplinary Charges, Respondent  
10 denies the allegations contained in that paragraph.

11 40. Responding to Paragraph 40 of the Notice of Disciplinary Charges, Respondent  
12 denies the allegations contained in that paragraph.

13 41. Responding to Paragraph 41 of the Notice of Disciplinary Charges, Respondent  
14 denies the allegations contained in that paragraph.

15 42. Responding to Paragraph 42 of the Notice of Disciplinary Charges, Respondent  
16 denies the allegations contained in that paragraph.  
17

18 **COUNT 5**

19 43. Responding to Paragraph 43 of the Notice of Disciplinary Charges, Respondent  
20 denies the allegations contained in that paragraph.  
21

22 44. Responding to Paragraph 44 of the Notice of Disciplinary Charges, Respondent  
23 denies the allegations contained in that paragraph.

24 45. Responding to Paragraph 45 of the Notice of Disciplinary Charges, Respondent  
25 denies the allegations contained in that paragraph.

26 46. Responding to Paragraph 46 of the Notice of Disciplinary Charges, Respondent  
27

1 denies the allegations contained in that paragraph.

2 47. Responding to Paragraph 47 of the Notice of Disciplinary Charges, Respondent  
3 denies the allegations contained in that paragraph.  
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5 **COUNT 6**

6 48. Responding to Paragraph 48 of the Notice of Disciplinary Charges, Respondent  
7 denies the allegations contained in that paragraph.  
8

9 49. Responding to Paragraph 49 of the Notice of Disciplinary Charges, Respondent  
10 denies the allegations contained in that paragraph.

11 50. Responding to Paragraph 50 of the Notice of Disciplinary Charges, Respondent  
12 denies the allegations contained in that paragraph.

13 51. Responding to Paragraph 51 of the Notice of Disciplinary Charges, Respondent  
14 denies the allegations contained in that paragraph.

15 52. Responding to Paragraph 52 of the Notice of Disciplinary Charges, Respondent  
16 denies the allegations contained in that paragraph.  
17

18 **COUNT 7**

19 53. Responding to Paragraph 53 of the Notice of Disciplinary Charges, Respondent  
20 denies the allegations contained in that paragraph.  
21

22 54. Responding to Paragraph 54 of the Notice of Disciplinary Charges, Respondent  
23 denies the allegations contained in that paragraph.

24 55. Responding to Paragraph 55 of the Notice of Disciplinary Charges, Respondent  
25 denies the allegations contained in that paragraph.

26 56. Responding to Paragraph 56 of the Notice of Disciplinary Charges, Respondent  
27

1 denies the allegations contained in that paragraph.

2 57. Responding to Paragraph 57 of the Notice of Disciplinary Charges, Respondent  
3 denies the allegations contained in that paragraph.  
4

5 **COUNT 8**

6 58. Responding to Paragraph 58 of the Notice of Disciplinary Charges, Respondent  
7 denies the allegations contained in that paragraph.  
8

9 59. Responding to Paragraph 59 of the Notice of Disciplinary Charges, Respondent  
10 denies the allegations contained in that paragraph.

11 60. Responding to Paragraph 60 of the Notice of Disciplinary Charges, Respondent  
12 denies the allegations contained in that paragraph.

13 61. Responding to Paragraph 61 of the Notice of Disciplinary Charges, Respondent  
14 denies the allegations contained in that paragraph.

15 62. Responding to Paragraph 62 of the Notice of Disciplinary Charges, Respondent  
16 denies the allegations contained in that paragraph.  
17

18 63. Responding to Paragraph 63 of the Notice of Disciplinary Charges, Respondent  
19 denies the allegations contained in that paragraph.

20 **COUNT 9**

21 64. Responding to Paragraph 64 of the Notice of Disciplinary Charges, Respondent  
22 denies the allegations contained in that paragraph.  
23

24 65. Responding to Paragraph 65 of the Notice of Disciplinary Charges, Respondent  
25 denies the allegations contained in that paragraph.

26 66. Responding to Paragraph 66 of the Notice of Disciplinary Charges, Respondent  
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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 admits 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.



1           78. Responding to Paragraph 78 of the Notice of Disciplinary Charges, Respondent  
2 denies the allegations contained in that paragraph.

3           79. Responding to Paragraph 79 of the Notice of Disciplinary Charges, Respondent  
4 denies the allegations contained in that paragraph.

5           80. Responding to Paragraph 80 of the Notice of Disciplinary Charges, Respondent  
6 denies the allegations contained in that paragraph.

7           81. Responding to Paragraph 81 of the Notice of Disciplinary Charges, Respondent  
8 denies the allegations contained in that paragraph.

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

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

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

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16  
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18                           **COUNT 10**

19           85. Responding to Paragraph 85 of the Notice of Disciplinary Charges, Respondent  
20 denies the allegations contained in that paragraph.

21           86. Responding to Paragraph 86 of the Notice of Disciplinary Charges, Respondent  
22 denies the allegations contained in that paragraph.

23           87. Responding to Paragraph 87 of the Notice of Disciplinary Charges, Respondent  
24 denies the allegations contained in that paragraph.

1  
2 **COUNT 11**

3 88. Responding to Paragraph 88 of the Notice of Disciplinary Charges, Respondent  
4 denies the allegations contained in that paragraph.  
5

6 89. Responding to Paragraph 89 of the Notice of Disciplinary Charges, Respondent  
7 denies the allegations contained in that paragraph.

8 90. Responding to Paragraph 90 of the Notice of Disciplinary Charges, Respondent  
9 denies the allegations contained in that paragraph.

10 **COUNT 12**

11 91. Responding to Paragraph 91 of the Notice of Disciplinary Charges, Respondent  
12 denies the allegations contained in that paragraph.

13 92. Responding to Paragraph 92 of the Notice of Disciplinary Charges, Respondent  
14 denies the allegations contained in that paragraph.  
15

16 93. Responding to Paragraph 93 of the Notice of Disciplinary Charges, Respondent  
17 denies the allegations contained in that paragraph.

18 **COUNT 13**

19  
20 94. Responding to Paragraph 94 of the Notice of Disciplinary Charges, Respondent  
21 denies the allegations contained in that paragraph.

22 95. Responding to Paragraph 95 of the Notice of Disciplinary Charges, Respondent  
23 denies the allegations contained in that paragraph.

24 96. Responding to Paragraph 96 of the Notice of Disciplinary Charges, Respondent  
25 denies the allegations contained in that paragraph.  
26  
27

1  
2 **COUNT 14**

3 97. Responding to Paragraph 97 of the Notice of Disciplinary Charges, Respondent  
4 denies the allegations contained in that paragraph.

5 98. Responding to Paragraph 98 of the Notice of Disciplinary Charges, Respondent  
6 denies the allegations contained in that paragraph.

7 99. Responding to Paragraph 99 of the Notice of Disciplinary Charges, Respondent  
8 denies the allegations contained in that paragraph.

9 100. Responding to Paragraph 100 of the Notice of Disciplinary Charges, Respondent  
10 denies the allegations contained in that paragraph.

11 101. Responding to Paragraph 101 of the Notice of Disciplinary Charges, Respondent  
12 denies the allegations contained in that paragraph.

13 102. Responding to Paragraph 102 of the Notice of Disciplinary Charges, Respondent  
14 denies the allegations contained in that paragraph.

15 103. Responding to Paragraph 103 of the Notice of Disciplinary Charges, Respondent  
16 denies the allegations contained in that paragraph.

17 104. Responding to Paragraph 104 of the Notice of Disciplinary Charges, Respondent  
18 denies the allegations contained in that paragraph.

19 105. Responding to Paragraph 105 of the Notice of Disciplinary Charges, Respondent  
20 denies the allegations contained in that paragraph.

21 **COUNT 15**

22 106. Responding to Paragraph 106 of the Notice of Disciplinary Charges, Respondent  
23 denies the allegations contained in that paragraph.

107. Responding to Paragraph 107 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

108. Responding to Paragraph 108 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

109. Responding to Paragraph 109 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

110. Responding to Paragraph 110 of the Notice of Disciplinary Charges, Respondent admits the allegations contained in that paragraph.

111. Responding to Paragraph 111 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

112. Responding to Paragraph 112 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

113. Responding to Paragraph 113 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

114. Responding to Paragraph 114 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

**COUNT 16**

115. Responding to Paragraph 115 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

116. Responding to Paragraph 116 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

117. Responding to Paragraph 117 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

118. Responding to Paragraph 118 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

**COUNT 17**

119. Responding to Paragraph 119 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

120. Responding to Paragraph 120 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

121. Responding to Paragraph 121 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

122. Responding to Paragraph 122 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

123. Responding to Paragraph 123 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

124. Responding to Paragraph 124 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

125. Responding to Paragraph 125 of the Notice of Disciplinary Charges, Respondent admits the allegations contained in that paragraph.

126. Responding to Paragraph 126 of the Notice of Disciplinary Charges, 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.

**COUNT 18**

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.

**COUNT 19**

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 admits 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.

## COUNT 20

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.

**COUNT 21**

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 admits the allegations contained in that paragraph.

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.

**COUNT 22**

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

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.

**COUNT 23**

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 admits 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 24**

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.

1 Dated: January 31, 2012

A large, stylized handwritten signature in black ink, appearing to read 'Chance E. Gordon', is written over a horizontal line.

Member Chance E. Gordon

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**PROOF OF SERVICE**

I am a resident of Los Angeles. I am over the age of eighteen years and ~~an~~<sup>cc</sup> party to the within action; my business address is 121 W. Lexington Drive, Suite 214, Glendale, CA 91203.

On January 31, 2013, 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, 4<sup>th</sup> Floor**  
**Los Angeles, CA 90015**

\_\_\_\_ (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.

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

\_\_\_\_ Via Email to the addresses listed above.

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.

1/31/2013  
DATE

  
CHANCE E. GORDON