

1 RODNEY H. PARSONS, ESQ.; Bar No. 67074
2 **PARSONS & PIETRO**
3 Attorneys at Law
4 1400 North Brea Boulevard
5 Fullerton, California 92835
6 Tel: (714) 526-3600
7 Fax: (714) 526-4637
8 Email: <Rod@Parsonslaw.com>

FILED

SEP 23 2013

STATE BAR COURT
CLERK'S OFFICE
LOS ANGELES

STATE BAR COURT
COUNTY OF LOS ANGELES

10 In Re Matter of:
11 Rodney Hunter Parsons,
12 State Bar No. 67074
13 A member of the State Bar

CASE NO: 12-0-16514
13-0-11924

RESPONSE TO NOTICE

18 RODNEY H. PARSONS responds to Notice in the above-entitled action as follows:

19 (1) In Response to Count One:

20 a. Respondent denies the allegations set forth at paragraph 2, 7.

21 (2) In Response to Count Two:

22 a. Respondent denies the allegations set forth at paragraph 9, 10 and 12.

23 b. In response to paragraph 10, Respondent incorporates the response to
24 those allegations of Count One and incorporates those responses herein.

25 (3) In Response to Count Three:

26 a. Respondent denies the allegations set forth at paragraph 13, 17.

27 b. In response to paragraph 14, Respondent incorporates by reference and
28 makes a part of herein his responses to the allegations contained in said

1 paragraph.

2 (4) In Response to Count Four:

3 a. Respondent denies the allegations set forth at paragraph 19, 24, 25, and
4 26.

5 (5) In Response to Count Five:

6 a. Respondent denies the allegations set forth at paragraph 27, 29 and 30.

7 b. In response to paragraph 28, Respondent incorporates herein and by
8 reference and makes a part of hereof the responses to the allegations of
9 Count Four.

10 (6) In Response to Count Six:

11 a. Respondent denies the allegations set forth at paragraph 31, 33, 35 and
12 36.

13 b. In further response to paragraph 32, Respondent incorporates by
14 reference and makes a part hereof and incorporates herein the response
15 to the allegations of Count Four and Five.

16 (7) For First Affirmative Defense regarding Case No. 13-0-11924:

17 a. There does not exist a Judgment of Dissolution in that matter requiring
18 the disbursement of the balance in the Trust Account to Martinez and ex-
19 husband.

20 b. The Orders for disbursement issued in that action were complied with
21 and completed.

22 c. The balance remaining in the Client Trust Account were transferred
23 pursuant to direction to the Trust Account of ex-husband's attorney for
24 further disposition. All funds held in said Client Trust Account have
25 therefore been disbursed pursuant to Order and Stipulation. No
26 Judgment or any Order had been entered or issued requiring the
27 disbursement of any of the remaining balance and those funds to be
28 "disbursed equally between Martinez and her ex-husband".

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

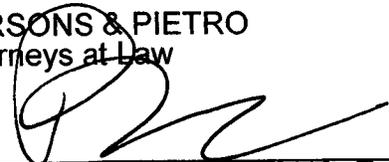
(8) For Second Affirmative Defense as to Case No. 12-0-16514:

a. To date all but \$60,000.00 have been disbursed to Seitz and Seitz' ex-wife pursuant to Stipulation entered into between Respondent and parties, with balance payable within the next 90 days.

Respectfully submitted.

Dated: September 23, 2013

PARSONS & PIETRO
Attorneys at Law



BY: RODNEY H. PARSONS, Esq.

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA, COUNTY OF ORANGE

3 I am employed in the County of Orange, State of California. I am over the age of
4 18 and not a party to the within action; my business is: 1400 North Brea Blvd., Fullerton,
5 California 92835.

6 On September 18, 2013, I served the foregoing document described as **RESPONSE**
7 **TO NOTICE** on all interested parties in this action by placing a true copy thereof enclosed
8 in sealed envelopes addressed as follows:

8 Maria Ghobadi, Deputy Trial Counsel
9 State Bar of California
10 1149 S. Hill Street
11 Los Angeles, CA 90015-2299

Paul Barona, Case Administrator
1149 S. Hill Street, 5th Floor
Los Angeles, CA 90015-2299

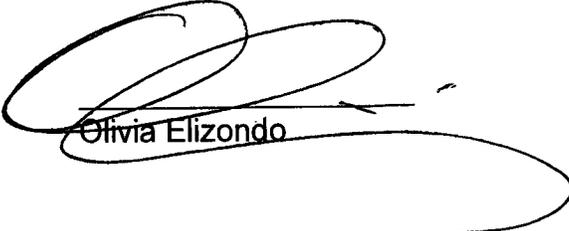
12 X (BY MAIL) I deposited such envelope(s) in the mail at Fullerton, California. The
13 envelope(s) was mailed with postage thereon fully prepaid. I am "readily familiar" with the
14 firm's practice of collection and processing of mail. It is deposited with the U.S. Postal
15 Service on that same date in the ordinary course of business. I am aware that on motion
16 of party served, service is presumed invalid if postal cancellation date or postage meter
17 date is more than one day after date of deposit for mailing Affidavit.

18 _____ (BY PERSONAL SERVICE) I caused such envelope(s) to be delivered by hand to
19 the office of the address(s).

20 _____ (BY FACSIMILE) I caused the above-entitled document to be sent to the recipient(s)
21 via Facsimile to the fax number(s) indicated above, pursuant to Code of Civil Procedure,
22 §1013(e). This document was transmitted from the office of Rodney H. Parsons in
23 Fullerton, California, on the date set forth above, during normal office hours (8:00 a.m. and
24 5:00 p.m.). I caused the machine to print a certificate of transmission, a copy of which is
25 attached hereto.

26 I declare under penalty of perjury under the laws of the State of California that the
27 foregoing is true and correct.

28 Executed on September 18, 2013, at Fullerton, California.


Olivia Elizondo