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**FILED**  
**SEP 11 2014**  
STATE BAR COURT  
CLERK'S OFFICE  
LOS ANGELES

6 In the matter of:  
7 CATALINA L. MANZANO

8 **STATE BAR OF CALIFORNIA**  
9 **STATE BAR COURT**

10 In the Matter of :  
11 CATALINA L. MANZANO  
12 Member No.: 191928  
13  
14 A Member of the State Bar

Case No. 13-0-11569-RAP  
**DEFENDANT'S ANSWER TO STATE  
BAR COMPLAINT AND GENERAL  
DENIAL**

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16 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

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18 COMES NOW Defendant CATALINA L MANZANO, hereinafter referred to as  
19 ("Ms." Manzano or "Defendant") and answers the Complaint herein for herself, as follows:

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21 **GENERAL DENIAL**

22 1. Under the provisions of Section 431.30 of the California Code of Civil Procedure, this  
23 answering Defendant generally denies each and every allegation in the complaint, and the  
24 whole thereof.

25 **FIRST AFFIRMATIVE DEFENSE**

26 2. For a first, separate, and affirmative defense, the complaint fails to state facts  
27 sufficient to constitute any cause of action against this answering Defendant.





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**NINTH AFFIRMATIVE DEFENSE**

10. For a ninth, separate and affirmative defense, this answering Defendant is informed and believes, and on such information and belief alleges, that plaintiff herein lacks standing to bring said action against this Defendant.

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**TENTH AFFIRMATIVE DEFENSE**

11. For a tenth, separate and affirmative defense, this answering Defendant is informed and believes and on such information and belief alleges, that plaintiff is barred from any recovery herein on the basis that plaintiff's own negligence was the sole and proximate cause of the damages allegedly sustained herein.

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**ELEVENTH AFFIRMATIVE DEFENSE**

12. For an eleventh, separate and affirmative defense, the plaintiff cannot recover against this answering Defendant based upon the theory of unclean hands.

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**TWELFTH AFFIRMATIVE DEFENSE**

13. For a twelfth, separate and affirmative defense, the plaintiff failed to perform the obligations and conditions to be performed on his part under the terms of the agreement alleged in the Complaint.

19 Dated: September 11, 2014

**MANZANO & ASSOCIATES**

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28  
By:   
Catalina L. Manzano

**CALIFORNIA STATE BAR COURT PROOF OF SERVICE**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to the action. My business address is 4790 Irvine Blvd., Suite 105330, Irvine, CA 92620.

On September 11, 2014, I served the following document(s): STATE BAR MEMBER CATALINA MANZANO'S ANSWER TO STATE BAR COMPLAINT AND GENERAL DENIAL

I served the documents on the following persons at the following addresses:

Susan J. Jackson, Esq.  
State Bar of California  
845 S. Figueroa Street  
Los Angeles, CA 90017-2515

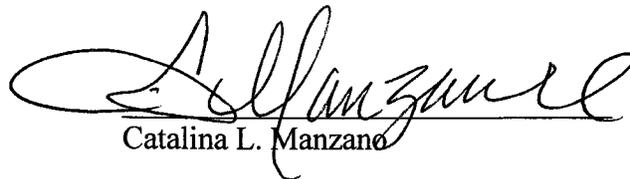
The documents were served by the following means:

(By U.S. Mail) I enclosed the documents in a sealed envelope or package addressed to the person(s) listed above.

By Personal Service

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

Executed on September 11, 2014 at Irvine, California.

  
Catalina L. Manzano