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STATE BAR COURT CLERK'S OFFICE
SAN FRANCISCO

Attorneys for Member
Mehrddad Alborz

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STATE BAR COURT

9 STATE BAR COURT CLERK'S OFFICE HEARING DEPARTMENT - LOS ANGELES
10 SAN FRANCISCO

<p>In the matter of</p> <p>MEHRDAD ALBORZ</p> <p>Member Number 188790</p> <p>A Member of the State Bar</p>	<p>Case No. 13-O-15473 AND 13-O-16117</p> <p>PROPOSED ANSWER OF MEHRDAD ALBORZ TO NOTICE OF DISCIPLINARY CHARGES (NDC)</p>
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17 For his Answer to the Notice of Charges ("NDC"), MEHRDAD ALBORZ, a
18 Member of the State Bar of California, states, as follows:

19 **JURISDICTION**

20
21 1. The jurisdictional allegations pertaining to MEHRDAD ALBORZ are true.

22 **COUNT ONE**

23 **Case No. 13-O-15473**
24 **Rules of Professional Conduct, Rule 3-110(A)**
25 **[Failure to Perform with Competence]**

26 2. Respondent admits that he never represented Mr. Houiman Hajibaik.

27 3. Respondent specifically denies each and every remaining allegations of
28

1 Paragraph 2.

2
3 **COUNT TWO**

4 **Case No. 13-O-15473**

5 **Rules of Professional Conduct, Rule 3-700(D)(2)**

6 **[Failure to Refund Unearned Fees]**

7 4. Respondent generally and specifically denies the allegations of Paragraph 3.

8 5. Respondent hereby incorporates by reference his answer to the allegations of

9 Count One.

10
11 **COUNT THREE**

12 **Case No. 13-O-15473**

13 **Business and Professions Code, section 6068(i)**

14 **[Failure to Cooperate in State Bar investigation]**

15 6. Respondent generally and specifically denies the allegations of Paragraph 4,
16 except that Respondent stopped accepting clients, respondent did not renew his law
17 license and had no notice of the allegations or the charges filed against him until
18 recently.

19 7. Respondent hereby incorporates by reference his answer to the allegation of

20
21 Count one and Count two.

22
23 **COUNT FOUR**

24 **Case No. 13-O-16117**

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

26 **[Failure to Perform with Competence]**

27 8. Respondent admits that he was retained by Armita Kavosisharifabad on or
28

1 about February 6, 2012 to perform legal services namely her marital dissolution
2 matter.

3
4 9. Respondent generally and specifically denies any other allegations of
5 paragraph 5.

6
7 **COUNT FIVE**

8 **Case No. 13-O-16117**
9 **Business and Professions Code, section 6068(m)**
10 **[Failure to Respond to Client Inquiries]**

11 10. Respondent generally and specifically denies any other allegations of
12 paragraph 6.

13 11. Respondent hereby incorporates by reference his answer to allegations of
14 Counts 4.

15
16 **COUNT SIX**

17 **Case No. 13-O-16117**
18 **Business and Professions Code, section 6068(m)**
19 **[Failure to Inform client of Significant development]**

20 12. Respondent generally and specifically denies any other allegations of
21 paragraph 7.

22 13. Respondent hereby incorporates by reference his answer to allegations of
23 Counts 4 and Counts 5.
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