

FILED

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STATE BAR COURT CLERK'S OFFICE
SAN FRANCISCO

1 STATE BAR OF CALIFORNIA
2 OFFICE OF CHIEF TRIAL COUNSEL
3 GREGORY P. DRESSER, No. 136532
4 INTERIM CHIEF TRIAL COUNSEL
5 SUSAN CHAN, No. 233229
6 ACTING ASSISTANT CHIEF TRIAL COUNSEL
7 ROBERT A. HENDERSON, No. 173205
8 SUPERVISING SENIOR TRIAL COUNSEL
9 ROBIN BRUNE, No. 149481
10 SENIOR TRIAL COUNSEL
11 180 Howard Street
12 San Francisco, California 94105-1639
13 Telephone: (415) 538-2218

STATE BAR COURT
HEARING DEPARTMENT - SAN FRANCISCO

13 In the Matter of:) Case No.: 14-O-00848
14 SANJAY BHARDWAJ,)
15 No. 257780) AMENDED NOTICE OF DISCIPLINARY
16 A Member of the State Bar.) CHARGES

NOTICE - FAILURE TO RESPOND!

17
18 **IF YOU FAIL TO FILE A WRITTEN ANSWER TO THIS NOTICE**
19 **WITHIN 20 DAYS AFTER SERVICE, OR IF YOU FAIL TO APPEAR AT**
20 **THE STATE BAR COURT TRIAL:**

- 21 (1) **YOUR DEFAULT WILL BE ENTERED;**
22 (2) **YOUR STATUS WILL BE CHANGED TO INACTIVE AND YOU**
23 **WILL NOT BE PERMITTED TO PRACTICE LAW;**
24 (3) **YOU WILL NOT BE PERMITTED TO PARTICIPATE FURTHER IN**
25 **THESE PROCEEDINGS UNLESS YOU MAKE A TIMELY MOTION**
26 **AND THE DEFAULT IS SET ASIDE, AND;**
27 (4) **YOU SHALL BE SUBJECT TO ADDITIONAL DISCIPLINE.**
28 **SPECIFICALLY, IF YOU FAIL TO TIMELY MOVE TO SET ASIDE**
OR VACATE YOUR DEFAULT, THIS COURT WILL ENTER AN
ORDER RECOMMENDING YOUR DISBARMENT WITHOUT
FURTHER HEARING OR PROCEEDING. SEE RULE 5.80 ET SEQ.,
RULES OF PROCEDURE OF THE STATE BAR OF CALIFORNIA.

The State Bar of California alleges:



1 against respondent by failing to report to the State Bar \$10,500 in sanctions the court imposed on
2 respondent on or about March 10, 2014, in connection with *Marriage of Anupama and Sanjay*
3 *Bhardwaj*, Alameda County Superior Court case no. FF08380050, in willful violation of
4 Business and Professions Code, section 6068(o)(3).

5 COUNT FOUR

6 Case No. 14-O-00848

7 Business and Professions Code, section 6068(c)

8 [Maintaining an Unjust Action]

9 5. Between on or about April 9, 2010, and on or about February 28, 2012, respondent
10 failed to counsel or maintain such action, proceedings, or defenses only as appear to respondent
11 legal or just by filing on behalf of himself three appeals of court orders from *Marriage of*
12 *Anupama and Sanjay Bhardwaj*, Alameda County Superior Court case no. FF08380050 in the
13 California Court of Appeal (Appellate case nos. A128171, A130338, 131205 (consolidated)) that
14 were frivolous, without merit, prosecuted for an improper purpose and for the purpose of delay,
15 in willful violation of Business and Professions Code, section 6068(c).

16 COUNT FIVE

17 Case No. 14-O-00848

18 Business and Professions Code, section 6068(a)

19 [Failure to Comply With Laws – Failure to Follow Rules of Court]

20 6. On or about May 2, 2011 and/ or about May 11, 2011, respondent, after losing a
21 motion to file a brief in excess of the Court's word limit, submitted Supplemental Opening Briefs
22 in *Anupama Bhardwaj v. Sanjay Bhardwaj*, filed in the Court of Appeal, First Appellate District,
23 case nos. A128171, A130338 and A131205 (consolidated) with briefs that exceeded the Court's
24 maximum total allowable words of 23,000 [14,000 plus 9,000] by implementing respondent's
25 own unique system of abbreviation, and respondent thereby failed to abide by California Rules
26 of Court, rule 8.204(c)(1), and the Court's order of on or about March 11, 2011, in willful
27 violation of Business and Professions Code, section 6068(a).

28 COUNT SIX

Case No. 14-O-00848

Business and Professions Code, section 6106

[Bad Faith Non-Compliance with Court Orders]

7. On or about May 2, 2011, and/or on or about May 11, 2011, respondent, after losing a

1 motion to file a brief in excess of the Court's word limit, submitted Supplemental Opening Briefs
2 in *Anupama Bhardwaj v. Sanjay Bhardwaj*, filed in the Court of Appeal, First Appellate District,
3 case nos. A128171, A130338 and A131205 (consolidated) with briefs that exceeded the Court's
4 maximum allowable words of 23,000 [14,000 plus 9,000] by implementing respondent's own
5 unique system of abbreviation, and respondent thereby wilfully and in bad faith failed to abide
6 by the Court's order on briefing schedule issued on or about March 11, 2011, thereby
7 committing an act of moral turpitude in violation of Business and Professions Code, section
8 6106.

9 COUNT SEVEN

10 Case No. 14-O-00848

11 Business and Professions Code, section 6068(b)

12 [Failing to Maintain Respect due to the Court and Judicial Officers]

13 8. On or about May 2, 2011, and/or on or about May 11, 2011, respondent, after losing a
14 motion to file a brief in excess of the Court's word limit, submitted Supplemental Opening Briefs
15 in *Anupama Bhardwaj v. Sanjay Bhardwaj*, filed in the Court of Appeal, First Appellate District,
16 case nos. A128171, A130338 and A131205 (consolidated) with a brief that exceeded the Court's
17 maximum allowable words of 23,000 [14,000 plus 9,000] by implementing respondent's own
18 unique system of abbreviation, and respondent thereby failed to maintain respect due to the
19 courts of justice and judicial officers in willful violation of Business and Professions Code,
20 section 6068(b).

21 COUNT EIGHT

22 Case No. 14-O-00848

23 Business and Professions Code, section 6068(b)

24 [Failing to Maintain Respect due to the Court and Judicial Officers]

25 9. On or about October 5-7, 2009, respondent knew that opposing counsel and Court
26 proceeded with a three-day hearing before the Honorable Judge Grimmer in *Marriage of*
27 *Anupama and Sanjay Bhardwaj*, filed in the Alameda County Superior Court, case no.
28 FF08380050, on issues of child and spousal support, based upon the mistaken belief that
respondent was employed, when in fact respondent knew he was unemployed and knew that the
Court and opposing party thought he was employed, and immediately thereafter, on or about

1 January 27, 2010, respondent objected to the tentative findings of the court, issued on or about
2 January 12, 2010, based upon his unemployment, and thereby failed to maintain respect due to
3 the courts of justice and judicial officers in willful violation of Business and Professions Code,
4 section 6068(b).

5 COUNT NINE
6 Case No. 14-O-00848
7 Business and Professions Code, section 6068(g)
8 [Commencing or Continuing an Unjust Action]

9 10. Between on or about July 10, 2012, and on or about December 14, 2013, respondent
10 commenced or continued the following actions or proceedings from a corrupt motive of passion
11 or interest for the purposes of harassment and delay in willful violation of Business and
12 Professions Code, section 6068(g) by filing the following actions or proceedings:

- 13 A) Motion for Realty Division Under Reserved Jurisdiction, Stay, Move Venue and
14 Continue Hearing, filed on or about July 10, 2012 in the *Marriage of Anupama*
15 *and Sanjay Bhardwaj*, filed in the Alameda County Superior Court, case no.
16 FF08380050;
- 17 B) Respondent's Objections to Minute Order for September 26, 2012 Hearing, filed
18 on or about October 1, 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*,
19 filed in the Alameda County Superior Court, case no. FF08380050;
- 20 C) Respondent's Notice of Appeal, filed on or about October 3, 2012 in the
21 *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County
22 Superior Court, case no. FF08380050 [*Anupama Pathak v. Sanjay Bhardwaj*,
23 California Court of Appeal, First Appellate District, case no. A136756, lodged
24 October 9, 2012];¹
- 25 D) Respondent's Request for an Order requesting a stay, filed on or about October
26 12, 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda
27 County Superior Court, case no. FF08380050;
- 28 E) Respondent's Objections to the Order After Hearing, filed on or about October

¹ Appeal dismissed on or about February 7, 2013.

- 1 16, 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda
2 County Superior Court, case no. FF08380050;
- 3 F) Respondent's Request for a Temporary Emergency Court Order, filed on or about
4 October 17, 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the
5 Alameda County Superior Court, case no. FF08380050;
- 6 G) Respondent's Amended Notice of Appeal, filed on or about October 17, 2012 in
7 the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County
8 Superior Court, case no. FF08380050 [*Anupama Pathak v. Sanjay Bhardwaj*,
9 California Court of Appeal, First Appellate District, case nos. A136756, lodged
10 October 19, 2012];
- 11 H) Respondent's Petition for Writ of Stay, filed on or about October 19, 2012 in
12 *Anupama Pathak v. Sanjay Bhardwaj*, in the California Court of Appeal, First
13 Appellate District, case nos. A136756;
- 14 I) Respondent's Amended Ex Parte Request for Reconsideration of Temporary
15 Orders (Stay) and for Order Alleging Mistake of Law/Fact; respondent's
16 Arguments in Support of OSC; and respondent's Objections to Order After
17 Hearing re Possession and Writ of Execution filed on or about October 22, 2012
18 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County
19 Superior Court, case no. FF08380050;
- 20 J) Respondent's Appellant's Petition for Review from Interlocutory Order on
21 Summary Denial of Stay Pending Appeal, filed on or about October 30, 2012 in
22 *Anupama Pathak v. Sanjay Bhardwaj*, in the California Court of Appeal, First
23 Appellate District, case nos. A136756 [California Supreme Court Case no.
24 S206287];²
- 25 K) Respondent's Application for Stay from Denial of Stay Pending Appeal from
26
27

28 ² Petition for Review denied on or about November 2, 2012.

- 1 California Supreme Court,³ filed on or about November 8, 2012 in *Sanjay*
 2 *Bhardwaj v. Anupama Pathak*, case no. 12A500, S206287
 3 [(A136756)(FF08380050)] filed in the United States Supreme Court;⁴
 4 L) Respondent's Claim to Right of Possession, filed on or about November 29, 2012
 5 in *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County
 6 Superior Court, case no. FF08380050;⁵
 7 M) Respondent's Motion to Quash Writ of Possession, filed on or about December 3,
 8 2012 in *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda
 9 County Superior Court, case no. FF08380050;
 10 N) Respondent's Objections to Striking Claim of Possession, filed on or about
 11 December 5, 2012 in *Marriage of Anupama and Sanjay Bhardwaj*, filed in the
 12 Alameda County Superior Court, case no. FF08380050;
 13 O) Respondent's Complaints for Disqualification of Judge Pulido, filed on or about
 14 August 1, 2011,⁶ March 1, 2012,⁷ October 24, 2012,⁸ October 26, 2012⁹ February
 15 7, 2013, (with additional pleadings filed on or about February 26, 2013)¹⁰ in
 16 *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County
 17 Superior Court, case no. FF08380050;
 18 P) Respondent's Responsive Declaration to Request for Order, filed on or about
 19 April 16, 2013 in *Marriage of Anupama and Sanjay Bhardwaj*, filed in the
 20 Alameda County Superior Court, case no. FF08380050;
 21 Q) OMITTED
 22

23 ³ On the court docket, this document is entitled Application for a Stay Pending the Filing and
 24 Disposition of a Petition for a Writ of Certiorari.

24 ⁴ Application for Stay denied on or about November 19, 2012 (Justice Kennedy); respondent
 25 requested that it be resubmitted to another justice and it was denied again on December 3, 2012
 (Justice Breyer).

25 ⁵ Claim stricken on or about November 30, 2012.

26 ⁶ Denied on or about August 4, 2011.

26 ⁷ Denied on or about March 5, 2012.

27 ⁸ Denied on or about October 25, 2012.

27 ⁹ Denied on or about December 14, 2012.

28 ¹⁰ Denied on or about March 1, 2013.

- 1 R) Respondent's federal lawsuit, filed on or about August 16, 2013 in *Bhardwaj v.*
- 2 *Pathak, Pulido, Nixon, ACSC, Thorndal, Grewal, Ahern, White, Coldwell Banker,*
- 3 *First American Title, Kaur & Dhami*, filed in the United States District Court
- 4 (Northern California) case no. 13-cv-03807;¹¹
- 5 S) Respondent's notice of filing Notice of Removal, filed on or about August 26,
- 6 2013 in *First American Title Co. v. Pathak & Bhardwaj*, Alameda Superior Court
- 7 case no. HG13681389, filed in the United States District Court (Northern
- 8 California) case no. 13-cv-03947;¹²
- 9 T) Respondent's federal appeal, filed on or about December 4, 2013 in *Bhardwaj v.*
- 10 *Pathak, Pulido, Nixon, ACSC, Thorndal, Grewal, Ahern, White, Coldwell Banker,*
- 11 *First American Title, Kaur & Dhami*, United States Court of Appeals, 9th Circuit,
- 12 case no. 13-17498 (13-cv-03807); and
- 13 U) Respondent's federal appeal, filed on or about December 14, 2013 in *First*
- 14 *American Title Co. v. Pathak & Bhardwaj*, United States Court of Appeals, 9th
- 15 Circuit, case no. 13-17553 (13-cv-03947).¹³

COUNT TEN
 Case No. 14-O-00848
 Business and Professions Code, section 6068(c)
 [Maintaining an Unjust Action]

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 18
 19 11. Between on or about July 10, 2012, and on or about December 14, 2013, respondent
 20 failed to maintain such action, proceedings, or defenses only as appear to respondent legal or just
 21 by filing and pursuing on behalf of himself the following actions or proceedings that lacked
 22 merit and were filed for an improper purpose and for purpose of delay, in willful violation of
 23 Business and Professions Code, section 6068(c):

- 24 A) Motion for Realty Division Under Reserve Jurisdiction, Stay, Move Venue and
- 25 Continue Hearing, filed on or about July 10, 2012 in the *Marriage of Anupama*
- 26 *and Sanjay Bhardwaj*, filed in the Alameda County Superior Court, case no.

27 ¹¹ Dismissed on or about November 7, 2013.
 28 ¹² Remand granted or about November 25, 2013.
¹³ Dismissed on or about January 16, 2014.

- 1 FF08380050;
- 2 B) Respondent's Objections to Minute Order for September 26, 2012 Hearing, filed
3 on or about October 1, 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*,
4 filed in the Alameda County Superior Court, case no. FF08380050;
- 5 C) Respondent's Notice of Appeal, filed on or about October 3, 2012 in the
6 *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County
7 Superior Court, case no. FF08380050 [California Court of Appeal, First Appellate
8 District, *Anupama Pathak v. Sanjay Bhardwaj*, case no. A136756, lodged October
9 9, 2012];¹⁴
- 10 D) Respondent's Request for an Order requesting a stay, filed on or about October
11 12, 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda
12 County Superior Court, case no. FF08380050;
- 13 E) Respondent's Objections to the Order After Hearing, filed on or about October
14 16, 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda
15 County Superior Court, case no. FF08380050;
- 16 F) Respondent's Request for a Temporary Emergency Court Order, filed on or about
17 October 17, 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the
18 Alameda County Superior Court, case no. FF08380050;
- 19 G) Respondent's Amended Notice of Appeal, filed on or about October 17, 2012 in
20 the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County
21 Superior Court, case no. FF08380050 [*Anupama Pathak v. Sanjay Bhardwaj*,
22 California Court of Appeal, First Appellate District, case nos. A136756, lodged
23 October 19, 2012];
- 24 H) Respondent's Petition for Writ of Stay, filed on or about October 19, 2012 in
25 *Anupama Pathak v. Sanjay Bhardwaj*, in the California Court of Appeal, First
26 Appellate District, case nos. A136756;
- 27

28 ¹⁴ Appeal dismissed on or about February 7, 2013.

- 1 I) Respondent's Amended Ex Parte Request for Reconsideration of Temporary
- 2 Orders (Stay) and for Order Alleging Mistake of Law/Fact; respondent's
- 3 Arguments in Support of OSC; and respondent's Objections to Order After
- 4 Hearing re Possession and Writ of Execution filed on or about October 22, 2012
- 5 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County
- 6 Superior Court, case no. FF08380050;
- 7 J) Respondent's Appellant's Petition for Review from Interlocutory Order on
- 8 Summary Denial of Stay Pending Appeal, filed on or about October 30, 2012 in
- 9 *Anupama Pathak v. Sanjay Bhardwaj*, in the California Court of Appeal, First
- 10 Appellate District, case nos. A136756 [California Supreme Court Case no.
- 11 S206287];¹⁵
- 12 K) Respondent's Application for Stay from Denial of Stay Pending Appeal from
- 13 California Supreme Court¹⁶, filed on or about November 8, 2012 in *Sanjay*
- 14 *Bhardwaj v. Anupama Pathak*, case no. 12A500, S206287
- 15 [(A136756)(FF08380050)] filed in the United States Supreme Court;¹⁷
- 16 L) Respondent's Claim to Right of Possession, filed on or about November 29, 2012
- 17 in *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County
- 18 Superior Court, case no. FF08380050;¹⁸
- 19 M) Respondent's Motion to Quash Writ of Possession, filed on or about December 3,
- 20 2012 in *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda
- 21 County Superior Court, case no. FF08380050;
- 22 N) Respondent's Objections to Striking Claim of Possession, filed on or about
- 23 December 5, 2012 in *Marriage of Anupama and Sanjay Bhardwaj*, filed in the

24 ¹⁵ Petition for Review denied on or about November 2, 2012.

25 ¹⁶ On the court docket, this document is entitled Application for a Stay Pending the Filing and

26 Disposition of a Petition for a Writ of Certiorari.

27 ¹⁷ Application for Stay denied on or about November 19, 2012 (Justice Kennedy); respondent

28 then requested that it be resubmitted to another justice and it was denied again on December 3,

2012 (Justice Breyer).

¹⁸ Claim stricken on or about November 30, 2012.

- 1 Alameda County Superior Court, case no. FF08380050;
- 2 O) Respondent's Complaints for Disqualification of Judge Pulido, filed on or about
3 August 1, 2011,¹⁹ March 1, 2012,²⁰ October 24, 2012,²¹ October 26, 2012²²
4 February 7, 2013 (with additional pleadings filed on or about February 26,
5 2013),²³ in *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda
6 County Superior Court, case no. FF08380050;
- 7 P) Respondent's Responsive Declaration to Request for Order, filed on or about
8 April 16, 2013 in *Marriage of Anupama and Sanjay Bhardwaj*, filed in the
9 Alameda County Superior Court, case no. FF08380050;
- 10 Q) OMITTED
- 11 R) Respondent's federal lawsuit, filed on or about August 16, 2013 in *Bhardwaj v.*
12 *Pathak, Pulido, Nixon, ACSC, Thorndal, Grewal, Ahern, White, Coldwell Banker,*
13 *First American Title, Kaur & Dhami*, filed in the United States District Court
14 (Northern California) case no. 13-cv-03807;²⁴
- 15 S) Respondent's notice of filing Notice of Removal, filed on or about August 26,
16 2013 in *First American Title Co. v. Pathak & Bhardwaj*, Alameda Superior Court
17 case no. HG13681389, filed in the United States District Court (Northern
18 California) case no. 13-cv-03947;²⁵
- 19 T) Respondent's federal appeal, filed on or about December 4, 2013 in *Bhardwaj v.*
20 *Pathak, Pulido, Nixon, ACSC, Thorndal, Grewal, Ahern, White, Coldwell Banker,*
21 *First American Title, Kaur & Dhami*, United States Court of Appeals, 9th Circuit,
22 case no. 13-17498 (13-cv-03807); and
- 23 U) Respondent's federal appeal, filed on or about December 14, 2013 in *First*
24

25 ¹⁹ Denied on or about August 4, 2011.
26 ²⁰ Denied on or about March 5, 2012.
27 ²¹ Denied on or about October 25, 2012.
28 ²² Denied on or about December 14, 2012.
²³ Denied on or about March 1, 2013.
²⁴ Dismissed on or about November 7, 2013.
²⁵ Remand granted on or about November 25, 2013.

1 *American Title Co. v. Pathak & Bhardwaj*, United States Court of Appeals, 9th
2 Circuit, case no. 13-17553 (13-cv-03947).²⁶

3 COUNT ELEVEN

4 Case No. 14-O-00848

5 Business and Professions Code, section 6106

6 [Moral Turpitude – Bad Faith Non-compliance with Court Orders]

7 12. Between on or about September 26, 2012, and on or about December 14, 2013,
8 respondent filed the following pleadings and took the following actions for the improper purpose
9 of preventing or delaying the sale of his family residence, or retaliating against others for the sale
10 of his family residence, in violation of the Court's orders, including the minute order dated on or
11 about September 26, 2012, the Findings and Order After Hearing, dated on or about October 10,
12 2012, and the Court's Emergency Temporary Order dated October 10, 2012, to cooperate with
13 the sale of the marital property in *Marriage of Anupama and Sanjay Bhardwaj*, Alameda County
14 Superior Court, case no. FF08380050, and to vacate the property located at 701 Bodega Court in
15 Fremont, California, within two weeks of the date the Emergency Temporary Order dated
16 October 10, 2012, and respondent thereby committed acts of moral turpitude, dishonesty or
17 corruption in willful violation of Business and Professions Code, section 6106:

18 A. Respondent's Objections to Minute Order for September 26, 2012 Hearing, filed on
19 or about October 1, 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in
20 the Alameda County Superior Court, case no. FF08380050;

21 B. Respondent's Notice of Appeal, filed on or about October 3, 2012 in the *Marriage of*
22 *Anupama and Sanjay Bhardwaj*, filed in the Alameda County Superior Court, case
23 no. FF08380050 [California Court of Appeal, First Appellate District, *Anupama*
24 *Pathak v. Sanjay Bhardwaj*, case nos. A136756, lodged October 9, 2012];²⁷

25 C. Respondent's Request for an Order requesting a stay, filed on or about October 12,
26 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County
27 Superior Court, case no. FF08380050;

28 ²⁶ Dismissed on or about January 16, 2014.

²⁷ Appeal dismissed on or about February 7, 2013.

- 1 D. Respondent's Objections to the Order After Hearing, filed on or about October 16,
2 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County
3 Superior Court, case no. FF08380050;
- 4 E. Respondent's Request for a Temporary Emergency Court Order, filed on or about
5 October 17, 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the
6 Alameda County Superior Court, case no. FF08380050;
- 7 F. Respondent's Amended Notice of Appeal, filed on or about October 17, 2012 in the
8 *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County Superior
9 Court, case no. FF08380050 [*Anupama Pathak v. Sanjay Bhardwaj*, California Court
10 of Appeal, First Appellate District, case nos. A136756, lodged October 19, 2012];
- 11 G. Respondent's Petition for Writ of Stay, filed on or about October 19, 2012 in
12 *Anupama Pathak v. Sanjay Bhardwaj*, in the California Court of Appeal, First
13 Appellate District, case nos. A136756;
- 14 H. Respondent's Amended Ex Parte Request for Reconsideration of Temporary Orders
15 (Stay) and for Order Alleging Mistake of Law/Fact; respondent's Arguments in
16 Support of OSC; and respondent's Objections to Order After Hearing re Possession
17 and Writ of Execution, filed on or about October 22, 2012 in the *Marriage of*
18 *Anupama and Sanjay Bhardwaj*, filed in the Alameda County Superior Court, case
19 no. FF08380050;
- 20 I. Respondent's Appellant's Petition for Review from Interlocutory Order on Summary
21 Denial of Stay Pending Appeal, filed on or about October 30, 2012 in *Anupama*
22 *Pathak v. Sanjay Bhardwaj*, in the California Court of Appeal, First Appellate
23 District, case nos. A136756 [California Supreme Court Case no. S206287];²⁸
- 24 J. Respondent's Application for Stay from Denial of Stay Pending Appeal from
25 California Supreme Court²⁹, filed on or about November 8, 2012 in *Sanjay Bhardwaj*
26

27 ²⁸ Petition for Review denied on or about November 2, 2012.

28 ²⁹ On the court docket, document is entitled Application for a Stay Pending the Filing and
Disposition of a Petition for a Writ of Certiorari.

- 1 v. *Anupama Pathak*, case no. 12A500, S206287 [(A136756)(FF08380050)] filed in
2 the United States Supreme Court;³⁰
- 3 K. Respondent's Claim to Right of Possession, filed on or about November 29, 2012 in
4 *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County Superior
5 Court, case no. FF08380050;³¹
- 6 L. Respondent's Motion to Quash Writ of Possession, filed on or about December 3,
7 2012 in *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County
8 Superior Court, case no. FF08380050;
- 9 M. Respondent's Objections to Striking Claim of Possession, filed on or about December
10 5, 2012 in *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County
11 Superior Court, case no. FF08380050;
- 12 N. Respondent's Complaints for Disqualification of Judge Pulido, filed on or about
13 August 1, 2011,³² March 1, 2012,³³ October 24, 2012,³⁴ October 26, 2012³⁵ February
14 7, 2013, (with supplemental pleadings filed on February 26, 2013)³⁶ in *Marriage of*
15 *Anupama and Sanjay Bhardwaj*, filed in the Alameda County Superior Court, case
16 no. FF08380050;
- 17 O. Respondent's Responsive Declaration to Request for Order, filed on or about April
18 16, 2013 in *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda
19 County Superior Court, case no. FF08380050;
- 20 P. OMITTTED
- 21 Q. Respondent's federal lawsuit, filed on or about August 16, 2013 in *Bhardwaj v.*
22 *Pathak, Pulido, Nixon, ACSC, Thorndal, Grewal, Ahern, White, Coldwell Banker,*

25 ³⁰ Application for Stay denied on or about November 19, 2012.
26 ³¹ Claim stricken on or about November 30, 2012.
27 ³² Denied on or about August 4, 2011.
28 ³³ Denied on or about March 5, 2012.
 ³⁴ Denied on or about October 25, 2012.
 ³⁵ Denied on or about December 14, 2012.
 ³⁶ Denied on or about March 1, 2013.

1 *First American Title, Kaur & Dhani*, filed in the United States District Court
2 (Northern California) case no. 13-cv-03807;³⁷

3 R. Respondent's notice of filing Notice of Removal, filed on or about August 26, 2013
4 in *First American Title Co. v. Pathak & Bhardwaj*, Alameda Superior Court case no.
5 HG13681389, filed in the United States District Court (Northern California) case no.
6 13-cv-03947;³⁸

7 S. Respondent's federal appeal, filed on or about December 4, 2013 in *Bhardwaj v.*
8 *Pathak, Pulido, Nixon, ACSC, Thorndal, Grewal, Ahern, White, Coldwell Banker,*
9 *First American Title, Kaur & Dhani*, United States Court of Appeals, 9th Circuit, case
10 no. 13-17498 (13-cv-03807);

11 T. Respondent's federal appeal, filed on or about December 14, 2013 in *First American*
12 *Title Co. v. Pathak & Bhardwaj*, United States Court of Appeals, 9th Circuit, case no.
13 13-17553 (13-cv-03947);³⁹

14 U. On or about September 28, 2012, respondent sent email to opposing counsel
15 indicating his refusal to accept the September 26, 2012 court order regarding the sale
16 of the Fremont residence;

17 V. On or about September 29, 2012 respondent sent emails to the realtor assigned by the
18 Court, threatening suit if she carried out the sale orders of the court;

19 W. On or about December 26, 2012 respondent recorded a lis pendens against property
20 located at 701 Bodega Court, Fremont, CA 94593 with the County of Alameda,
21 which was expunged by order of the Court dated on or about February 8, 2013;

22 X. On or about November 29, 2012 respondent filed a claim of right to possession;⁴⁰ and

23 Y. On or about December 5, 2012, respondent refused to leave the family residence,
24 requiring a forcible eviction from the sheriff's office.

25
26
27 ³⁷ Dismissed on or about November 7, 2013.

³⁸ Remand granted on or about November 25, 2013.

³⁹ Dismissed on or about January 16, 2014.

⁴⁰ Claim stricken on or about November 30, 2012

COUNT TWELVE
Case No. 14-O-00848
Business and Professions Code, section 6068(b)
[Failure to Maintain Respect with the Court]

1
2
3 13. Between on or about September 26, 2012, and on or about December 14, 2014,
4 respondent filed the following pleadings and took the following actions for the improper purpose
5 of preventing or delaying the sale of his family residence, or retaliating against others for the sale
6 of his family residence, in violation of the Court's orders, including the minute order dated on or
7 about September 26, 2012, the Findings and Order After Hearing, dated on or about October 10,
8 2012, and the Court's Emergency Temporary Order dated on or about October 10, 2012, to
9 cooperate with the sale of the marital property in *Marriage of Anupama and Sanjay Bhardwaj*,
10 Alameda County Superior Court, case no. FF08380050, and to vacate the property located at 701
11 Bodega Court in Fremont, California, within two weeks of the date the Emergency Temporary
12 Order dated October 10, 2012, and respondent thereby failed to maintain respect due to the
13 courts of justice and judicial officers in willful violation of Business and Professions Code,
14 section 6068(b).

- 15 A. Respondent's Objections to Minute Order for September 26, 2012 Hearing, filed on
16 or about October 1, 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in
17 the Alameda County Superior Court, case no. FF08380050;
18 B. Respondent's Notice of Appeal, filed on or about October 3, 2012 in the *Marriage of*
19 *Anupama and Sanjay Bhardwaj*, filed in the Alameda County Superior Court, case
20 no. FF08380050 [California Court of Appeal, First Appellate District, *Anupama*
21 *Pathak v. Sanjay Bhardwaj*, case nos. A136756, lodged October 9, 2012];⁴¹
22 C. Respondent's Request for an Order requesting a stay, filed on or about October 12,
23 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County
24 Superior Court, case no. FF08380050;
25 D. Respondent's Objections to the Order After Hearing, filed on or about October 16,
26 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County
27

28 ⁴¹ Appeal dismissed on or about February 7, 2013.

- 1 Superior Court, case no. FF08380050;
- 2 E. Respondent's Request for a Temporary Emergency Court Order, filed on or about
- 3 October 17, 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the
- 4 Alameda County Superior Court, case no. FF08380050;
- 5 F. Respondent's Amended Notice of Appeal, filed on or about October 17, 2012 in the
- 6 *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County Superior
- 7 Court, case no. FF08380050 [*Anupama Pathak v. Sanjay Bhardwaj*, California Court
- 8 of Appeal, First Appellate District, case nos. A136756, lodged October 19, 2012];
- 9 G. Respondent's Petition for Writ of Stay, filed on or about October 19, 2012 in
- 10 *Anupama Pathak v. Sanjay Bhardwaj*, in the California Court of Appeal, First
- 11 Appellate District, case nos. A136756;
- 12 H. Respondent's Amended Ex Parte Request for Reconsideration of Temporary Orders
- 13 (Stay) and for Order Alleging Mistake of Law/Fact; respondent's Arguments in
- 14 Support of OSC; and respondent's Objections to Order After Hearing re Possession
- 15 and Writ of Execution, filed on or about October 22, 2012 in the *Marriage of*
- 16 *Anupama and Sanjay Bhardwaj*, filed in the Alameda County Superior Court, case
- 17 no. FF08380050;
- 18 I. Respondent's Appellant's Petition for Review from Interlocutory Order on Summary
- 19 Denial of Stay Pending Appeal, filed on or about October 30, 2012 in *Anupama*
- 20 *Pathak v. Sanjay Bhardwaj*, in the California Court of Appeal, First Appellate
- 21 District, case nos. A136756 [California Supreme Court Case no. S206287];⁴²
- 22 J. Respondent's Application for Stay from Denial of Stay Pending Appeal from
- 23 California Supreme Court⁴³, filed on or about November 8, 2012 in *Sanjay Bhardwaj*
- 24 *v. Anupama Pathak*, case no. 12A500, S206287 [(A136756)(FF08380050)] filed in
- 25 the United States Supreme Court;⁴⁴

26 _____
⁴² Petition for Review denied on or about November 2, 2012.

27 ⁴³ On docket, document is entitled Application for a Stay Pending the Filing and Disposition of a
Petition for a Writ of Certiorari.

28 ⁴⁴ Application for Stay denied on or about November 19, 2012.

- 1 K. Respondent's Claim to Right of Possession, filed on or about November 29, 2012 in
- 2 *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County Superior
- 3 Court, case no. FF08380050;⁴⁵
- 4 L. Respondent's Motion to Quash Writ of Possession, filed on or about December 3,
- 5 2012 in *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County
- 6 Superior Court, case no. FF08380050;
- 7 M. Respondent's Objections to Striking Claim of Possession, filed on or about December
- 8 5, 2012 in *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County
- 9 Superior Court, case no. FF08380050;
- 10 N. Respondent's Complaints for Disqualification of Judge Pulido, filed on or about
- 11 August 1, 2011,⁴⁶ March 1, 2012,⁴⁷ October 24, 2012,⁴⁸ October 26, 2012⁴⁹ February
- 12 7, 2013 (with supplemental briefing filed on February 26, 2013)⁵⁰ in *Marriage of*
- 13 *Anupama and Sanjay Bhardwaj*, filed in the Alameda County Superior Court, case
- 14 no. FF08380050;
- 15 O. Respondent's Responsive Declaration to Request for Order, filed on or about April
- 16 16, 2013 in *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda
- 17 County Superior Court, case no. FF08380050;
- 18 P. OMITTED
- 19 Q. Respondent's federal lawsuit, filed on or about August 16, 2013 in *Bhardwaj v.*
- 20 *Pathak, Pulido, Nixon, ACSC, Thorndal, Grewal, Ahern, White, Coldwell Banker,*
- 21 *First American Title, Kaur & Dhami*, filed in the United States District Court
- 22 (Northern California) case no. 13-cv-03807;⁵¹

25 ⁴⁵ Claim stricken on or about November 30, 2012.
26 ⁴⁶ Denied on or about August 4, 2011.
27 ⁴⁷ Denied on or about March 5, 2012.
28 ⁴⁸ Denied on or about October 25, 2012.
⁴⁹ Denied on or about December 14, 2012.
⁵⁰ Denied March 1, 2013.
⁵¹ Dismissed on or about November 7, 2013.

- 1 R. Respondent's notice of filing Notice of Removal, filed on or about August 26, 2013
- 2 in *First American Title Co. v. Pathak & Bhardwaj*, Alameda Superior Court case no.
- 3 HG13681389, filed in the United States District Court (Northern California) case no.
- 4 13-cv-03947;⁵²
- 5 S. Respondent's federal appeal, filed on or about December 4, 2013 in *Bhardwaj v.*
- 6 *Pathak, Pulido, Nixon, ACSC, Thorndal, Grewal, Ahern, White, Coldwell Banker,*
- 7 *First American Title, Kaur & Dhani*, United States Court of Appeals, 9th Circuit, case
- 8 no. 13-17498 (13-cv-03807);
- 9 T. Respondent's federal appeal, filed on or about December 14, 2013 in *First American*
- 10 *Title Co. v. Pathak & Bhardwaj*, United States Court of Appeals, 9th Circuit, case no.
- 11 13-17553 (13-cv-03947);⁵³
- 12 U. On or about September 28, 2012, respondent sent email to opposing counsel
- 13 indicating his refusal to accept the September 26, 2012 court order regarding the sale
- 14 of the Fremont residence;
- 15 V. On or about September 29, 2012 respondent sent emails to the realtor assigned by the
- 16 Court, threatening suit if she carried out the sale orders of the court; and
- 17 W. On or about December 26, 2012 respondent recorded a lis pendens against property
- 18 located at 701 Bodega Court, Fremont, CA 94593 with the County of Alameda,
- 19 which was expunged by order of the Court dated February 8, 2013;
- 20 X. On or about November 29, 2012 respondent filed a claim of right to possession;⁵⁴ and
- 21 Y. On or about December 5, 2012, respondent refused to leave the family residence,
- 22 requiring eviction from the sheriff's office.

23 ///

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27 ⁵² Remand granted on or about November 25, 2013.

28 ⁵³ Dismissed on or about January 16, 2014.

⁵⁴ Claim stricken on or about November 30, 2012.

-19-

COUNT THIRTEEN

Case No. 14-O-00848

Business and Professions Code, section 6068(a)
[Failure to Comply With Laws]

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3 14. Between on or about September 26, 2012, and on or about December 14, 2014,
4 respondent filed the following pleadings and took the following actions for the improper purpose
5 of preventing or delaying the sale of his family residence, or retaliating against others for the sale
6 of his family residence, in violation of the Court's orders, including the minute order dated on or
7 about September 26, 2012, the Findings and Order After Hearing, dated on or about October 10,
8 2012, and the Court's Emergency Temporary Order dated on or about October 10, 2012, to
9 cooperate with the sale of the marital property in *Marriage of Anupama and Sanjay Bhardwaj*,
10 Alameda County Superior Court, case no. FF08380050, and to vacate the property located at 701
11 Bodega Court in Fremont, California, within two weeks of the date the Emergency Temporary
12 Order dated October 10, 2012, and respondent thereby failed to comply with the law in willful
13 violation of Business and Professions Code, section 6068(a):

- 14
15 A. Respondent's Objections to Minute Order for September 26, 2012 Hearing, filed on
16 or about October 1, 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in
17 the Alameda County Superior Court, case no. FF08380050;
- 18 B. Respondent's Notice of Appeal, filed on or about October 3, 2012 in the *Marriage of*
19 *Anupama and Sanjay Bhardwaj*, filed in the Alameda County Superior Court, case
20 no. FF08380050 [California Court of Appeal, First Appellate District, *Anupama*
21 *Pathak v. Sanjay Bhardwaj*, case nos. A136756, lodged October 9, 2012];⁵⁵
- 22 C. Respondent's Request for an Order requesting a stay, filed on or about October 12,
23 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County
24 Superior Court, case no. FF08380050;
- 25 D. Respondent's Objections to the Order After Hearing, filed on or about October 16,
26 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County
27 Superior Court, case no. FF08380050;

28 ⁵⁵ Appeal dismissed on or about February 7, 2013.

- 1 E. Respondent's Request for a Temporary Emergency Court Order, filed on or about
2 October 17, 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the
3 Alameda County Superior Court, case no. FF08380050;
- 4 F. Respondent's Amended Notice of Appeal, filed on or about October 17, 2012 in the
5 *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County Superior
6 Court, case no. FF08380050 [*Anupama Pathak v. Sanjay Bhardwaj*, California Court
7 of Appeal, First Appellate District, case nos. A136756, lodged October 19, 2012];
- 8 G. Respondent's Petition for Writ of Stay, filed on or about October 19, 2012 in
9 *Anupama Pathak v. Sanjay Bhardwaj*, in the California Court of Appeal, First
10 Appellate District, case nos. A136756;
- 11 H. Respondent's Amended Ex Parte Request for Reconsideration of Temporary Orders
12 (Stay) and for Order Alleging Mistake of Law/Fact; respondent's Arguments in
13 Support of OSC; and respondent's Objections to Order After Hearing re Possession
14 and Writ of Execution, filed on or about October 20, 2012 in the *Marriage of*
15 *Anupama and Sanjay Bhardwaj*, filed in the Alameda County Superior Court, case
16 no. FF08380050;
- 17 I. Respondent's Appellant's Petition for Review from Interlocutory Order on Summary
18 Denial of Stay Pending Appeal, filed on or about October 30, 2012 in *Anupama*
19 *Pathak v. Sanjay Bhardwaj*, in the California Court of Appeal, First Appellate
20 District, case nos. A136756 [California Supreme Court Case no. S206287];⁵⁶
- 21 J. Respondent's Application for Stay from Denial of Stay Pending Appeal from
22 California Supreme Court⁵⁷, filed on or about November 8, 2012 in *Sanjay Bhardwaj*
23 *v. Anupama Pathak*, case no. 12A500, S206287 [(A136756)(FF08380050)] filed in
24 the United States Supreme Court;⁵⁸
- 25 K. Respondent's Claim to Right of Possession, filed on or about November 29, 2012 in

26 ⁵⁶ Petition for Review denied on or about November 2, 2012.

27 ⁵⁷ On docket, document is entitled Application for a Stay Pending the Filing and Disposition of a
28 Petition for a Writ of Certiorari.

⁵⁸ Application for Stay denied on or about November 19, 2012.

- 1 *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County Superior
2 Court, case no. FF08380050;⁵⁹
- 3 L. Respondent's Motion to Quash Writ of Possession, filed on or about December 3,
4 2012 in *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County
5 Superior Court, case no. FF08380050;
- 6 M. Respondent's Objections to Striking Claim of Possession, filed on or about December
7 5, 2012 in *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County
8 Superior Court, case no. FF08380050;
- 9 N. Respondent's Complaints for Disqualification of Judge Pulido, filed on or about
10 August 1, 2011,⁶⁰ March 1, 2012,⁶¹ October 24, 2012,⁶² October 26, 2012⁶³ February
11 7, 2013 (with supplemental briefing filed on February 26, 2013),⁶⁴ in *Marriage of*
12 *Anupama and Sanjay Bhardwaj*, filed in the Alameda County Superior Court, case
13 no. FF08380050;
- 14 O. Respondent's Responsive Declaration to Request for Order, filed on or about April
15 16, 2013 in *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda
16 County Superior Court, case no. FF08380050;
- 17 P. OMITTED
- 18 Q. Respondent's federal lawsuit, filed on or about August 16, 2013 in *Bhardwaj v.*
19 *Pathak, Pulido, Nixon, ACSC, Thorndal, Grewal, Ahern, White, Coldwell Banker,*
20 *First American Title, Kaur & Dhami*, filed in the United States District Court
21 (Northern California) case no. 13-cv-03807;⁶⁵
- 22 R. Respondent's notice of filing Notice of Removal, filed on or about August 26, 2013
23 in *First American Title Co. v. Pathak & Bhardwaj*, Alameda Superior Court case no.

25 ⁵⁹ Claim stricken on or about November 30, 2012.
26 ⁶⁰ Denied on or about August 4, 2011.
27 ⁶¹ Denied on or about March 5, 2012.
28 ⁶² Denied on or about October 25, 2012.
 ⁶³ Denied on or about December 14, 2012.
 ⁶⁴ Denied on or about March 1, 2013.
 ⁶⁵ Dismissed on or about November 7, 2013.

- 1 HG13681389, filed in the United States District Court (Northern California) case no.
2 13-cv-03947,⁶⁶
- 3 S. Respondent's federal appeal, filed on or about December 4, 2013 in *Bhardwaj v.*
4 *Pathak, Pulido, Nixon, ACSC, Thorndal, Grewal, Ahern, White, Coldwell Banker,*
5 *First American Title, Kaur & Dhami*, United States Court of Appeals, 9th Circuit, case
6 no. 13-17498 (13-cv-03807);
- 7 T. Respondent's federal appeal, filed on or about December 14, 2013 in *First American*
8 *Title Co. v. Pathak & Bhardwaj*, United States Court of Appeals, 9th Circuit, case no.
9 13-17553 (13-cv-03947);⁶⁷
- 10 U. On or about September 28, 2012, respondent sent email to opposing counsel
11 indicating his refusal to accept the September 26, 2012 court order regarding the sale
12 of the Fremont residence;
- 13 V. On or about September 29, 2012 respondent sent emails to the realtor assigned by the
14 Court, threatening suit if she carried out the sale orders of the court;
- 15 W. On or about December 26, 2012 respondent recorded a lis pendens against property
16 located at 701 Bodega Court, Fremont, CA 94593 with the County of Alameda,
17 which was expunged by order of the Court dated February 8, 2013;
- 18 X. On or about November 29, 2012 respondent filed a claim of right to possession;⁶⁸
19 and
- 20 Y. On or about December 5, 2012, respondent refused to leave the family residence,
21 requiring eviction from the sheriff's office.

22
23 **NOTICE - INACTIVE ENROLLMENT!**

24 **YOU ARE HEREBY FURTHER NOTIFIED THAT IF THE STATE BAR**
25 **COURT FINDS, PURSUANT TO BUSINESS AND PROFESSIONS CODE**
26 **SECTION 6007(c), THAT YOUR CONDUCT POSES A SUBSTANTIAL**

27 ⁶⁶ Remand granted on or about November 25, 2013.

28 ⁶⁷ Dismissed on or about January 16, 2014.

⁶⁸ Claim stricken on or about November 30, 2012.

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THREAT OF HARM TO THE INTERESTS OF YOUR CLIENTS OR TO THE PUBLIC, YOU MAY BE INVOLUNTARILY ENROLLED AS AN INACTIVE MEMBER OF THE STATE BAR. YOUR INACTIVE ENROLLMENT WOULD BE IN ADDITION TO ANY DISCIPLINE RECOMMENDED BY THE COURT.

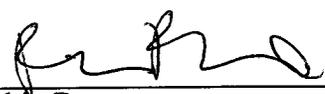
NOTICE - COST ASSESSMENT!

IN THE EVENT THESE PROCEDURES RESULT IN PUBLIC DISCIPLINE, YOU MAY BE SUBJECT TO THE PAYMENT OF COSTS INCURRED BY THE STATE BAR IN THE INVESTIGATION, HEARING AND REVIEW OF THIS MATTER PURSUANT TO BUSINESS AND PROFESSIONS CODE SECTION 6086.10.

Respectfully submitted,

THE STATE BAR OF CALIFORNIA
OFFICE OF THE CHIEF TRIAL COUNSEL

DATED: October 28, 2016

By: 

Robin Brune
Senior Trial Counsel

DECLARATION OF SERVICE

by

U.S. FIRST-CLASS MAIL / U.S. CERTIFIED MAIL / OVERNIGHT DELIVERY / FACSIMILE-ELECTRONIC TRANSMISSION

CASE NUMBER(s): 14-O-00848

I, the undersigned, am over the age of eighteen (18) years and not a party to the within action, whose business address and place of employment is the State Bar of California, 180 Howard Street, San Francisco, California 94105, declare that:

- on the date shown below, I caused to be served a true copy of the within document described as follows:

AMENDED NOTICE OF DISCIPLINARY CHARGES

- By U.S. First-Class Mail: (CCP §§ 1013 and 1013(a))
By U.S. Certified Mail: (CCP §§ 1013 and 1013(a))
By Overnight Delivery: (CCP §§ 1013(c) and 1013(d))
By Fax Transmission: (CCP §§ 1013(e) and 1013(f))
By Electronic Service: (CCP § 1010.6)

(for U.S. First-Class Mail) in a sealed envelope placed for collection and mailing at San Francisco, addressed to: (see below)
(for Certified Mail) in a sealed envelope placed for collection and mailing as certified mail, return receipt requested, Article No.: 9414 7266 9904 2069 9447 19 at San Francisco, addressed to: (see below)
(for Overnight Delivery) together with a copy of this declaration, in an envelope, or package designated by UPS, Tracking No.: addressed to: (see below)

Table with 4 columns: Person Served, Business-Residential Address, Fax Number, Courtesy Copy to. Row 1: Sanjay Bhardwaj, Law Offices of Sanjay Bhardwaj, 44663 Japala Place, Fremont, CA 94539, Electronic Address.

via inter-office mail regularly processed and maintained by the State Bar of California addressed to:

N/A

I am readily familiar with the State Bar of California's practice for collection and processing of correspondence for mailing with the United States Postal Service, and overnight delivery by the United Parcel Service ('UPS'). In the ordinary course of the State Bar of California's practice, correspondence collected and processed by the State Bar of California would be deposited with the United States Postal Service that same day, and for overnight delivery, deposited with delivery fees paid or provided for, with UPS that same day.

I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date on the envelope or package is more than one day after date of deposit for mailing contained in the affidavit.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed at San Francisco, California, on the date shown below.

DATED: October 31, 2016

SIGNED: Dawn Williams
Dawn Williams
Declarant