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FILED *ll*

SEP 29 2016

STATE BAR COURT CLERK'S OFFICE
SAN FRANCISCO

STATE BAR COURT

HEARING DEPARTMENT - SAN FRANCISCO

In the Matter of:

SANJAY BHARDWAJ,
No. 257780,

A Member of the State Bar.

) Case No.: 14-O-00848

) AMENDED NOTICE OF DISCIPLINARY
) CHARGES AS TO COUNTS FIVE, SIX,
) AND SEVEN

NOTICE - FAILURE TO RESPOND!

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

- (1) YOUR DEFAULT WILL BE ENTERED;**
- (2) YOUR STATUS WILL BE CHANGED TO INACTIVE AND YOU
WILL NOT BE PERMITTED TO PRACTICE LAW;**
- (3) YOU WILL NOT BE PERMITTED TO PARTICIPATE FURTHER IN
THESE PROCEEDINGS UNLESS YOU MAKE A TIMELY MOTION
AND THE DEFAULT IS SET ASIDE, AND;**
- (4) YOU SHALL BE SUBJECT TO ADDITIONAL DISCIPLINE.
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:

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1 briefs that exceeded the Court's maximum allowable words of 23,000 [14,000 plus
2 9,000] by implementing respondent's own unique system of abbreviation, and respondent
3 thereby wilfully and in bad faith failed to abide by the Court's order on briefing schedule
4 issued on or about March 11, 2011, thereby committing an act of moral turpitude in
5 violation of Business and Professions Code, section 6106.

6 COUNT SEVEN

7 Case No. 14-O-00848

8 Business and Professions Code, section 6068(b)

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

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

18 NOTICE - INACTIVE ENROLLMENT!

19 **YOU ARE HEREBY FURTHER NOTIFIED THAT IF THE STATE BAR
20 COURT FINDS, PURSUANT TO BUSINESS AND PROFESSIONS CODE
21 SECTION 6007(c), THAT YOUR CONDUCT POSES A SUBSTANTIAL
22 THREAT OF HARM TO THE INTERESTS OF YOUR CLIENTS OR TO
23 THE PUBLIC, YOU MAY BE INVOLUNTARILY ENROLLED AS AN
24 INACTIVE MEMBER OF THE STATE BAR. YOUR INACTIVE
25 ENROLLMENT WOULD BE IN ADDITION TO ANY DISCIPLINE
26 RECOMMENDED BY THE COURT.**

27 NOTICE - COST ASSESSMENT!

28 **IN THE EVENT THESE PROCEDURES RESULT IN PUBLIC
DISCIPLINE, YOU MAY BE SUBJECT TO THE PAYMENT OF COSTS**

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**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 CHIEF TRIAL COUNSEL

DATED: September 15, 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: 14-O-00848 - PEM

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:

MOTION TO AMEND NOTICE OF DISCIPLINARY CHARGES; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION OF ROBIN BRUNE; PROPOSED AMENDED NOTICE OF DISCIPLINARY CHARGES AS TO COUNTS FIVE, SIX, AND SEVEN [Rule 5.44, Rules of Procedure of State Bar]

- 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 2042 4872 88 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: September 15, 2016

SIGNED: Paula H. D'Oyen Declarant