

**FILED**

**SEP 18 2015**

STATE BAR COURT  
CLERK'S OFFICE  
LOS ANGELES

1 MARTIN E. KELLER - Bar No. 104159  
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4

5 In Pro Per  
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8 **STATE BAR COURT OF CALIFORNIA**  
9 **HEARING DEPARTMENT - LOS ANGELES**

10  
11 **In the Matter of**  
12 **MARTIN E. KELLER**  
13 **A Member of the State Bar,**  
14 **No. 104159.**

**Case No. 14-O-1211**

**RESPONSE OF MARTIN E. KELLER  
TO NOTICE OF DISCIPLINARY  
CHARGES**

15  
16 In response to the Notice of Disciplinary Charges, Martin E. Keller admits, denies  
17 and alleges as follows:

18 1. Sydia Turner executed a loan modification agreement with SunTrust  
19 Mortgage, Inc. Under the loan modification agreement, here monthly payments were  
20 reduced slightly to around \$2,000.00 per month.

21 2. SunTrust Mortgage, Inc. refused to accept payments made by Ms. Turner in  
22 accordance with the loan modification agreement, and eventually commenced a  
23 foreclosure action.

24 3. Martin E. Keller, as counsel for Sydia Turner, commenced an action against  
25 SunTrust Mortgage, Inc. seeking to halt the foreclosure action and to recover damages.

26 4. Suntrust Mortgage, Inc. sold its loan to Nationstar Mortgage, LLC, and  
27 reimbursed Sydia Turner for certain mortgage payments made for the purpose of  
28 reinstating the loan .





**PROOF OF SERVICE**

STATE OF CALIFORNIA, COUNTY OF SAN BERNARDINO

I am employed in the County of San Bernardino, State of California. I am over the age of 18 and not a party to the within action; my business address is 323 W. Court Street, Suite 302, San Bernardino, California 92401.

On September 18, 2015, I served the foregoing document described as **RESPONSE OF MARTIN E. KELLER TO NOTICE OF DISCIPLINARY CHARGES** on the interested parties set forth hereinbelow by placing a true copy thereof enclosed in a sealed envelope, with first-class postage thereon fully prepaid, addressed as follows:

CHARLES T. CALIX  
Deputy Trial Counsel  
845 South Figueroa Street  
Los Angeles, CA 90017

*to be personally served on Mr. Calix's office*  
~~I caused such envelope with postage thereon fully prepaid to be placed in the United States mail at San Bernardino, California.~~

Executed on September 18, 2015, at Redlands, California.

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

  
Martin E. Keller