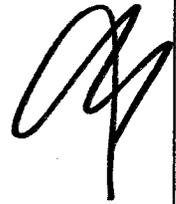


1 Catalina L. Manzano (State Bar No. 191928)  
2 P.O. Box 802332  
3 Santa Clarita, CA 91380  
4 Tel: (310) 488-8635

**FILED**  
**JUL 09 2015**



STATE BAR COURT  
CLERK'S OFFICE  
LOS ANGELES

5 In the matter of:  
6 CATALINA L. MANZANO

7 **STATE BAR OF CALIFORNIA**  
8 **STATE BAR COURT**

9 **In the Matter of:** ) Case No.: 14-0-01463  
10 **CATALINA L. MANZANO** )  
11 **Member No.: 191928** ) **DEFENDANT'S ANSWER TO STATE BAR**  
12 **A Member of the State Bar** ) **COMPLAINT AND GENERAL DENIAL**  
13 )  
14 )  
15 )

16 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

17  
18 COMES NOW Defendant, CATALINA L. MANZANO, and answers the Complaint  
19 herein for herself, as follows:

20  
21 **GENERAL DENIAL**

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

24 **FIRST AFFIRMATIVE DEFENSE**

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

3. For a second, separate and affirmative defense, the plaintiff's claims as set forth in the complaint, and each of them, are barred by the Statute of Limitations applicable thereto.

**THIRD AFFIRMATIVE DEFENSE**

4. For a third, separate and affirmative defense, the plaintiff failed to mitigate it's damages and therefore, cannot recover against this answering Defendant.

**FOURTH AFFIRMATIVE DEFENSE**

5. For a fourth, separate and affirmative defense, the plaintiff failed to make it's claim in a timely fashion and is therefore barred by laches against this answering Defendant.

**FIFTH AFFIRMATIVE DEFENSE**

6. For a fifth, separate and affirmative defense, the Defendant alleges that plaintiff is estopped from asserting a claim against this answering Defendant based on plaintiff's conduct and acts which are sufficient to constitute estoppel.

**SIXTH AFFIRMATIVE DEFENSE**

7. For a sixth, separate and affirmative defense, the plaintiff has waived any claim it alleges against this answering Defendant due to plaintiff's conduct and acts which are sufficient to constitute waiver.

**SEVENTH AFFIRMATIVE DEFENSE**

8. For an seventh, separate and affirmative defense, the plaintiff cannot Recover against these answering Defendants based upon the theory of unclean hands.

**EIGHTH AFFIRMATIVE DEFENSE**

9. For an eighth, separate and affirmative defense, the defendants are not liable for the damages claimed by the Plaintiff because the damages, if any, were caused by others.

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**NINTH AFFIRMATIVE DEFENSE**

10. For an 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.

**TENTH AFFIRMATIVE DEFENSE**

11. For an tenth, 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.

Dated: July 9, 2015

By:   
CATALINA L. MANZANO

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**CALIFORNIA STATE BAR COURT PROOF OF SERVICE**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over the age of 18. My business address is P.O. Box 802332, Santa Clarita, CA 91380.

On July 9, 2015 I filed and served the forgoing document described as STATE BAR MEMBER CATALINA L. MANZANO'S ANSWER TO STATE BAR COMPLAINT AND GENERAL DENIAL.

The documents were served on the following person at the following address:

Adriana M. Burger, Esq.  
Deputy Trial Counsel  
845 South Figueroa Street  
Los Angeles, CA 90017-2515

The documents were served by the following means:

**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 July 9, 2015 at Los Angeles, California



CATALINA L. MANZANO