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MARGOLIS & MARGOLIS LLP  
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Counsel for Respondent

**FILED**  
  
**MAR 26 2015**  
  
STATE BAR COURT  
CLERK'S OFFICE  
LOS ANGELES

**THE STATE BAR COURT  
OF THE STATE BAR OF CALIFORNIA  
HEARING DEPARTMENT - LOS ANGELES**

**In the Matter of** ) **Case No.: 14-O-02080-YDR**  
 )  
 ) **RESPONSE TO NOTICE OF**  
 ) **DISCIPLINARY CHARGES;**  
 ) **REQUEST FOR REFERRAL TO**  
 ) **ALTERNATIVE DISCIPLINE**  
 ) **PROGRAM [Rule of Proc. 5.381(B)]**  
**DAVID KYLE,** )  
**Member No. 55821** )  
**A Member of the State Bar** )

All further notices in relation to this proceeding are to be sent to Respondent's counsel:

Susan L. Margolis, Esq.  
MARGOLIS & MARGOLIS LLP  
Attorneys at Law  
2000 Riverside Drive  
Los Angeles, CA 90039  
Tel. (323) 953-8996

**RESPONSE TO NOTICE OF DISCIPLINARY CHARGES**

**JURISDICTION**

1. Responding to Paragraph 1 of the Notice of Disciplinary Charges, Respondent admits



1 the allegations stated in that paragraph.

2 **COUNT ONE**

3 2. Responding to Paragraph 2 of Count One of the Notice of Disciplinary Charges,  
4 Respondent denies the allegations stated in that paragraph.

5 **COUNT TWO**

6 3. Responding to Paragraph 3 of Count Two of the Notice of Disciplinary Charges,  
7 Respondent denies the allegations stated in that paragraph.

8 **COUNT THREE**

9 4. Responding to Paragraph 4 of Count Three of the Notice of Disciplinary Charges,  
10 Respondent denies the allegations stated in that paragraph.

11 **COUNT FOUR**

12 5. Responding to Paragraph 5 of Count Four of the Notice of Disciplinary Charges,  
13 Respondent denies the allegations stated in that paragraph.

14 **COUNT FIVE**

15 6. Responding to Paragraph 6 of Count Five of the Notice of Disciplinary Charges,  
16 Respondent denies the allegations stated in that paragraph.

17 **COUNT SIX**

18 7. Responding to Paragraph 7 of Count Six of the Notice of Disciplinary Charges,  
19 Respondent denies the allegations stated in that paragraph.

20 **COUNT SEVEN**

21 8. Responding to Paragraph 8 of Count Seven of the Notice of Disciplinary Charges,  
22 Respondent denies the allegations stated in that paragraph.

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**REQUEST FOR REFERRAL TO ALTERNATIVE  
DISCIPLINE PROGRAM ("ADP")**

Pursuant to Rule 5.381(B), Rules of Procedure, Respondent requests that he be referred to the ADP Program Judge for determination of his eligibility to participate in the Bar's Alternative Discipline Program.

**MARGOLIS & MARGOLIS LLP**

March 25, 2015

By:



**SUSAN L. MARGOLIS**

**Counsel for Respondent**

1 PROOF OF SERVICE BY MAIL

2 STATE OF CALIFORNIA )  
3 COUNTY OF LOS ANGELES ) ss.  
4 )

5 Case No. 14-O-02080

6 I am employed in the County of Los Angeles, State of California. I am over the age of eighteen  
7 (18) years, and am not a party to the within action. My business address is 2000 Riverside  
8 Drive, Los Angeles, California 90039.

9 On March 26, 2015, I served the foregoing document described as:

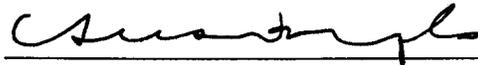
10 **RESPONSE TO NOTICE OF DISCIPLINARY CHARGES; REQUEST FOR**  
11 **REFERRAL INTO ALTERNATIVE DISCIPLINE PROGRAM [Rule of Proc. 5.381(B)]**

12 on the State Bar of California, by placing a true copy thereof, enclosed in a sealed envelope, with  
13 postage thereon fully prepaid, in the United States mail located at Los Angeles, California,  
14 addressed as follows:

15 Hugh G. Radigan  
16 Deputy Trial Counsel  
17 The State Bar of California  
18 845 South Figueroa Street  
19 Los Angeles, CA 90017-2515

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

22 Executed this 25th day of March, 2015, at Los Angeles, California.

23   
24 \_\_\_\_\_