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FILED
JUL 10 2015
STATE BAR COURT
CLERK'S OFFICE
LOS ANGELES

10 STATE BAR COURT
11 HEARING DEPARTMENT - LOS ANGELES

13 In the Matter of:) Case No. 14-O-05793
14 ERIC LEONARD NORDSKOG,)
15 No. 120935,) NOTICE OF DISCIPLINARY CHARGES
16 A Member of the State Bar)

17 **NOTICE - FAILURE TO RESPOND!**

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.



1 The State Bar of California alleges:

2 JURISDICTION

3 1. Eric Leonard Nordskog ("respondent") was admitted to the practice of law in the
4 State of California on December 10, 1985, was a member at all times pertinent to these charges,
5 and is currently a member of the State Bar of California.

6 COUNT ONE

7 Case No. 14-O-05793
8 Rules of Professional Conduct, rule 3-110(A)
9 [Failure to Perform with Competence]

10 2. On or about May 23, 2014, Jennifer Shannon-Yeganhe employed respondent to
11 perform legal services, namely to represent her in *Jennifer Shannon-Yeganhe vs. Cedars-Sinai*
12 *Medical Center, et al.*, Los Angeles County Superior Court, Case No. BC518996, which
13 respondent intentionally, recklessly, or repeatedly failed to perform with competence, in willful
14 violation of Rules of Professional Conduct, rule 3-110(A), by the following:

- 15 A. Failing to respond to Defendants Ternian, M.D. and Baron, M.D.'s discovery
16 requests (i.e. Form Interrogatories, Special Interrogatories, Requests for
17 Production of Documents, Requests for Admissions), which respondent received;
- 18 B. Failing to file any opposition to Defendants Ternian, M.D. and Baron, M.D.'s
19 Motions to Compel discovery responses (i.e. Form Interrogatories, Special
20 Interrogatories, Requests for Production of Documents, Requests for
21 Admissions), which respondent received;
- 22 C. Failing to file any opposition to Defendants Ternian, M.D. and Baron, M.D.'s
23 Motions for Summary Judgment, which respondent received; and
- 24 D. Failing to appear at a Summary Judgment hearing scheduled on September 23,
25 2014.

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COUNT TWO

Case No. 14-O-05793
Rules of Professional Conduct, rule 3-700(D)(1)
[Failure to Release File]

3. Respondent failed to release promptly, after termination of respondent's employment on or about October 19, 2014, to respondent's client, Jennifer Shannon-Yeganhe, all of the client's papers and property following the client's request for the client's file on October 19, 2014, in willful violation of Rules of Professional Conduct, rule 3-700(D)(1).

COUNT THREE

Case No. 14-O-05793
Business and Professions Code, section 6068(m)
[Failure to Respond to Client Inquiries]

4. Respondent failed to respond promptly to several telephonic reasonable status inquiries made by respondent's client, Jennifer Shannon-Yeganhe between July 2014 and October 2014, that respondent received in a matter in which respondent had agreed to provide legal services, in willful violation of Business and Professions Code, section 6068(m).

COUNT FOUR

Case No. 14-O-05793
Business and Professions Code, section 6068(m)
[Failure to Inform Client of Significant Development]

5. Respondent failed to keep respondent's client, Jennifer Shannon-Yeganhe, reasonably informed of significant developments in a matter in which respondent had agreed to provide legal services, in willful violation of Business and Professions Code, section 6068(m), by failing to inform the client of the following:

- A. That discovery (i.e. Form Interrogatories, Special Interrogatories, Requests for Production of Documents, Requests for Admissions) was propounded by Defendants, Alen Ternian, M.D. and Eli Baron, M.D. in *Jennifer Shannon-Yeganhe vs. Cedars-Sinai Medical Center, et al.*, Los Angeles County Superior Court, Case No. BC518996.

1 B. That Defendants, Alen Ternian, M.D. and Eli Baron, M.D.'s Motions to Compel
2 (i.e. Form Interrogatories, Special Interrogatories, Requests for Production of
3 Documents, Requests for Admissions), Requests for Sanctions, and Motions to
4 Deem Requests for Admissions Admitted, were granted by the Court on
5 September 5, 2014, in *Jennifer Shannon-Yeganhe vs. Cedars-Sinai Medical*
6 *Center, et al.*, Los Angeles County Superior Court, Case No. BC518996.

7 C. That client, Jennifer Shannon-Yeganhe, and respondent were ordered to pay \$600
8 in sanctions, jointly and severally, to Defendant Alen Ternian, M.D. by
9 September 11, 2014 in *Jennifer Shannon-Yeganhe vs. Cedars-Sinai Medical*
10 *Center, et al.*, Los Angeles County Superior Court, Case No. BC518996.

11 D. That client, Jennifer Shannon-Yeganhe, and respondent were ordered to pay \$600
12 in sanctions, jointly and severally, to Defendant Eli Baron, M.D. by September
13 11, 2014 in *Jennifer Shannon-Yeganhe vs. Cedars-Sinai Medical Center, et al.*,
14 Los Angeles County Superior Court, Case No. BC518996.

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16 COUNT FIVE

17 Case No. 14-O-05793

18 Business and Professions Code, section 6068(i)
19 [Failure to Cooperate in State Bar Investigation]

20 6. Respondent failed to cooperate and participate in a disciplinary investigation pending
21 against respondent by failing to provide a substantive response to the State Bar's letters of
22 October 20, 2014, November 5, 2014, December 22, 2014, January 16, 2015, and April 29, 2015,
23 which respondent received, that requested respondent's response to the allegations of misconduct
24 being investigated in State Bar Case No. 14-O-05793, in willful violation of Business and
25 Professions Code, section 6068(i).

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COUNT SIX

Case No. 14-O-05793
Business and Professions Code, section 6103
[Failure to Obey a Court Order]

7. Respondent disobeyed or violated an order of the court requiring respondent to do or forbear an act connected with or in the course of respondent's profession which respondent ought in good faith to do or forbear by failing to comply with the September 5, 2014 Order Granting Defendant, Alen Ternian, M.D.'s Request for Sanctions, and Defendant Eli Baron, M.D.'s Request for Sanctions, in *Jennifer Shannon-Yeganhe vs. Cedars-Sinai Medical Center, et al.*, Los Angeles County Superior Court, Case No. BC518996, in willful violation of Business and Professions Code, section 6103.

COUNT SEVEN

Case No. 14-O-05793
Rules of Professional Conduct, rule 3-700(A)(2)
[Improper Withdrawal from Employment]

8. Respondent failed, upon termination of employment, to take reasonable steps to avoid reasonably foreseeable prejudice to respondent's client, Jennifer Shannon-Yeganhe, by constructively terminating respondent's employment August 12, 2014, by failing to take any action on the client's behalf after August 12, 2014, and thereafter failing to inform the client that respondent was withdrawing from employment, in willful violation of Rules of Professional Conduct, rule 3-700(A)(2).

NOTICE - INACTIVE ENROLLMENT!

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

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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: July 10, 2015

By: _____
Sue Hong
Deputy 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-05793

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, 845 South Figueroa Street, Los Angeles, California 90017, declare that:

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

NOTICE OF DISCIPLINARY CHARGES

By U.S. First-Class Mail: (CCP §§ 1013 and 1013(a))

- in accordance with the practice of the State Bar of California for collection and processing of mail, I deposited or placed for collection and mailing in the City and County of Los Angeles.

By U.S. Certified Mail: (CCP §§ 1013 and 1013(a))

By Overnight Delivery: (CCP §§ 1013(c) and 1013(d))

- I am readily familiar with the State Bar of California's practice for collection and processing of correspondence for overnight delivery by the United Parcel Service ('UPS').

By Fax Transmission: (CCP §§ 1013(e) and 1013(f))

Based on agreement of the parties to accept service by fax transmission, I faxed the documents to the persons at the fax numbers listed herein below. No error was reported by the fax machine that I used. The original record of the fax transmission is retained on file and available upon request.

By Electronic Service: (CCP § 1010.6)

Based on a court order or an agreement of the parties to accept service by electronic transmission, I caused the documents to be sent to the person(s) at the electronic addresses listed herein below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

(for U.S. First-Class Mail) in a sealed envelope placed for collection and mailing at Los Angeles, addressed to: (see below)

(for Certified Mail) in a sealed envelope placed for collection and mailing as certified mail, return receipt requested,

Article No.: 7196 9008 9111 6410 6210 at Los Angeles, 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: ERIC LEONARD NORDSKOG, Law Office of Eric Nordskog PO Box 41603 Long Beach, CA 90853, 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 Los Angeles, California, on the date shown below.

DATED: July 10, 2015

SIGNED:

Handwritten signature of Kim Wimbish, printed name KIM WIMBISH, Declarant.