

JUN 06 2016

STATE BAR COURT CLERK'S OFFICE  
SAN FRANCISCO

STATE BAR OF CALIFORNIA  
OFFICE OF CHIEF TRIAL COUNSEL  
GREGORY P. DRESSER, No. 136532  
INTERIM CHIEF TRIAL COUNSEL  
SUSAN CHAN, No. 233229  
ACTING ASSISTANT CHIEF TRIAL COUNSEL  
ROBERT A. HENDERSON, No. 173205  
SUPERVISING SENIOR TRIAL COUNSEL  
ROBIN BRUNE, No. 149481  
SENIOR TRIAL COUNSEL  
180 Howard Street  
San Francisco, California 94105-1639  
Telephone: (415) 538-2218

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

STATE BAR COURT

HEARING DEPARTMENT - SAN FRANCISCO

In the Matter of: ) Case No.: 14-O-00848  
SANJAY BHARDWAJ, ) NOTICE OF DISCIPLINARY CHARGES  
No. 257780 )  
A Member of the State Bar. )

**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:

kwiktag® 211 096 968





1 respondent on or about March 10, 2014, in connection with *Marriage of Anupama and Sanjay*  
2 *Bhardwaj*, Alameda County Superior Court case no. FF08380050, in willful violation of  
3 Business and Professions Code, section 6068(o)(3).

4 COUNT FOUR

5 Case No. 14-O-00848

6 Business and Professions Code, section 6068(c)  
7 [Maintaining an Unjust Action]

8 5. Between on or about April 9, 2010, and on or about February 28, 2012, respondent  
9 failed to counsel or maintain such action, proceedings, or defenses only as appear to respondent  
10 legal or just by filing on behalf of himself three appeals of court orders from *Marriage of*  
11 *Anupama and Sanjay Bhardwaj*, Alameda County Superior Court case no. FF08380050 in the  
12 California Court of Appeal (Appellate case nos. A128171, A130338, 131205 (consolidated)) that  
13 were frivolous, without merit, prosecuted for an improper purpose and for the purpose of delay,  
14 in willful violation of Business and Professions Code, section 6068(c).

15 COUNT FIVE

16 Case No. 14-O-00848

17 Business and Professions Code, section 6068(a)  
18 [Failure to Comply With Laws – Failure to Follow Rules of Court]

19 6. On or about May 2, 2011, respondent, after losing a motion to file a brief in excess of  
20 the Court's word limit, submitted a Supplemental Opening Brief in *Anupama Bhardwaj v.*  
21 *Sanjay Bhardwaj*, filed in the Court of Appeal, First Appellate District, case nos. A128171,  
22 A130338 and A131205 (consolidated) with a brief that exceeded the Court's maximum  
23 allowable words of 14,000, by implementing respondent's own unique system of abbreviation,  
24 and respondent thereby failed to abide by California Rules of Court, rule 8.204(c)(1), and the  
25 Court's order of on or about March 11, 2011, in willful violation of Business and Professions  
26 Code, section 6068(a).

27 COUNT SIX

28 Case No. 14-O-00848

Business and Professions Code, section 6106  
[Bad Faith Non-Compliance with Court Orders]

7. On or about May 2, 2011, respondent, after losing a motion to file a brief in excess of  
the Court's word limit, submitted a Supplemental Opening Brief in *Anupama Bhardwaj v.*

1 *Sanjay Bhardwaj*, filed in the Court of Appeal, First Appellate District, case nos. A128171,  
2 A130338 and A131205 (consolidated) with a brief that exceeded the Court's maximum  
3 allowable words of 14,000, by implementing respondent's own unique system of abbreviation,  
4 and respondent thereby wilfully and in bad faith failed to abide by the Court's order on briefing  
5 schedule issued on or about March 11, 2011, thereby committing an act of moral turpitude in  
6 violation of Business and Professions Code, section 6106.

7 COUNT SEVEN

8 Case No. 14-O-00848

9 Business and Professions Code, section 6068(b)

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

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

18 COUNT EIGHT

19 Case No. 14-O-00848

20 Business and Professions Code, section 6068(b)

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

22 9. On or about October 5-7, 2009, respondent knew that opposing counsel and Court  
23 proceeded with a three-day hearing before the Honorable Judge Grimmer in *Marriage of*  
24 *Anupama and Sanjay Bhardwaj*, filed in the Alameda County Superior Court, case no.  
25 FF08380050, on issues of child and spousal support, based upon the mistaken belief that  
26 respondent was employed, when in fact respondent knew he was unemployed and knew that the  
27 Court and opposing party thought he was employed, and immediately thereafter, on or about  
28 January 27, 2010, respondent objected to the tentative findings of the court, issued on or about  
January 12, 2010, based upon his unemployment, and thereby failed to maintain respect due to  
the courts of justice and judicial officers in willful violation of Business and Professions Code,

1 section 6068(b).

2 COUNT NINE

3 Case No. 14-O-00848

4 Business and Professions Code, section 6068(g)  
5 [Commencing or Continuing an Unjust Action]

6 10. Between on or about July 10, 2012, and on or about December 14, 2013, respondent  
7 commenced or continued the following actions or proceedings from a corrupt motive of passion  
8 or interest for the purposes of harassment and delay in willful violation of Business and  
9 Professions Code, section 6068(g) by filing the following actions or proceedings:

- 10 A) Motion for Realty Division Under Reserved Jurisdiction, Stay, Move Venue and  
11 Continue Hearing, filed on or about July 10, 2012 in the *Marriage of Anupama  
12 and Sanjay Bhardwaj*, filed in the Alameda County Superior Court, case no.  
13 FF08380050;
- 14 B) Respondent's Objections to Minute Order for September 26, 2012 Hearing, filed  
15 on or about October 1, 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*,  
16 filed in the Alameda County Superior Court, case no. FF08380050;
- 17 C) Respondent's Notice of Appeal, filed on or about October 3, 2012 in the  
18 *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County  
19 Superior Court, case no. FF08380050 [*Anupama Pathak v. Sanjay Bhardwaj*,  
20 California Court of Appeal, First Appellate District, case no. A136756, lodged  
21 October 9, 2012];<sup>1</sup>
- 22 D) Respondent's Request for an Order requesting a stay, filed on or about October  
23 12, 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda  
24 County Superior Court, case no. FF08380050;
- 25 E) Respondent's Objections to the Order After Hearing, filed on or about October  
26 16, 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda  
27 County Superior Court, case no. FF08380050;
- 28 F) Respondent's Request for a Temporary Emergency Court Order, filed on or about

<sup>1</sup> Appeal dismissed on or about February 7, 2013.

1 October 17, 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the  
2 Alameda County Superior Court, case no. FF08380050;

3 G) Respondent's Amended Notice of Appeal, filed on or about October 17, 2012 in  
4 the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County  
5 Superior Court, case no. FF08380050 [*Anupama Pathak v. Sanjay Bhardwaj*,  
6 California Court of Appeal, First Appellate District, case nos. A136756, lodged  
7 October 19, 2012];

8 H) Respondent's Petition for Writ of Stay, filed on or about October 19, 2012 in  
9 *Anupama Pathak v. Sanjay Bhardwaj*, in the California Court of Appeal, First  
10 Appellate District, case nos. A136756;

11 I) Respondent's Amended Ex Parte Request for Reconsideration of Temporary  
12 Orders (Stay) and for Order Alleging Mistake of Law/Fact; respondent's  
13 Arguments in Support of OSC; and respondent's Objections to Order After  
14 Hearing re Possession and Writ of Execution filed on or about October 22, 2012  
15 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County  
16 Superior Court, case no. FF08380050;

17 J) Respondent's Appellant's Petition for Review from Interlocutory Order on  
18 Summary Denial of Stay Pending Appeal, filed on or about October 30, 2012 in  
19 *Anupama Pathak v. Sanjay Bhardwaj*, in the California Court of Appeal, First  
20 Appellate District, case nos. A136756 [California Supreme Court Case no.  
21 S206287];<sup>2</sup>

22 K) Respondent's Application for Stay from Denial of Stay Pending Appeal from  
23 California Supreme Court,<sup>3</sup> filed on or about November 8, 2012 in *Sanjay*  
24 *Bhardwaj v. Anupama Pathak*, case no. 12A500, S206287

25  
26  
27 <sup>2</sup> Petition for Review denied on or about November 2, 2012.

28 <sup>3</sup> On the court docket, this document is entitled Application for a Stay Pending the Filing and  
Disposition of a Petition for a Writ of Certiorari.

- 1 [(A136756)(FF08380050)] filed in the United States Supreme Court;<sup>4</sup>
- 2 L) Respondent's Claim to Right of Possession, filed on or about November 29, 2012
- 3 in *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County
- 4 Superior Court, case no. FF08380050;<sup>5</sup>
- 5 M) Respondent's Motion to Quash Writ of Possession, filed on or about December 3,
- 6 2012 in *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda
- 7 County Superior Court, case no. FF08380050;
- 8 N) Respondent's Objections to Striking Claim of Possession, filed on or about
- 9 December 5, 2012 in *Marriage of Anupama and Sanjay Bhardwaj*, filed in the
- 10 Alameda County Superior Court, case no. FF08380050;
- 11 O) Respondent's Complaints for Disqualification of Judge Pulido, filed on or about
- 12 August 1, 2011,<sup>6</sup> March 1, 2012,<sup>7</sup> October 24, 2012,<sup>8</sup> October 26, 2012<sup>9</sup> February
- 13 7, 2013, (with additional pleadings filed on or about February 26, 2013)<sup>10</sup> in
- 14 *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County
- 15 Superior Court, case no. FF08380050;
- 16 P) Respondent's Responsive Declaration to Request for Order, filed on or about
- 17 April 16, 2013 in *Marriage of Anupama and Sanjay Bhardwaj*, filed in the
- 18 Alameda County Superior Court, case no. FF08380050;
- 19 Q) Respondent's Complaint in Interpleader, filed on or about May 29, 2013 in *First*
- 20 *American Title Company v. Anupama Pathak and Sanjay Bhardwaj*, Alameda
- 21 Superior Court; case no. HG13681389;<sup>11</sup>
- 22

23 <sup>4</sup> Application for Stay denied on or about November 19, 2012 (Justice Kennedy); respondent

24 requested that it be resubmitted to another justice and it was denied again on December 3, 2012

(Justice Breyer).

25 <sup>5</sup> Claim stricken on or about November 30, 2012.

26 <sup>6</sup> Denied on or about August 4, 2011.

27 <sup>7</sup> Denied on or about March 5, 2012.

28 <sup>8</sup> Denied on or about October 25, 2012.

<sup>9</sup> Denied on or about December 14, 2012.

<sup>10</sup> Denied on or about March 1, 2013.

<sup>11</sup> This interpleader case was consolidated with *Marriage of Bhardwaj* on July 17, 2013 by way of Order After Hearing dated July 26, 2013.

- 1 R) Respondent's federal lawsuit, filed on or about August 16, 2013 in *Bhardwaj v.*  
2 *Pathak, Pulido, Nixon, ACSC, Thorndal, Grewal, Ahern, White, Coldwell Banker,*  
3 *First American Title, Kaur & Dhami*, filed in the United States District Court  
4 (Northern California) case no. 13-cv-03807;<sup>12</sup>
- 5 S) Respondent's notice of filing Notice of Removal, filed on or about August 26,  
6 2013 in *First American Title Co. v. Pathak & Bhardwaj*, Alameda Superior Court  
7 case no. HG13681389, filed in the United States District Court (Northern  
8 California) case no. 13-cv-03947;<sup>13</sup>
- 9 T) Respondent's federal appeal, filed on or about December 4, 2013 in *Bhardwaj v.*  
10 *Pathak, Pulido, Nixon, ACSC, Thorndal, Grewal, Ahern, White, Coldwell Banker,*  
11 *First American Title, Kaur & Dhami*, United States Court of Appeals, 9<sup>th</sup> Circuit,  
12 case no. 13-17498 (13-cv-03807); and
- 13 U) Respondent's federal appeal, filed on or about December 14, 2013 in *First*  
14 *American Title Co. v. Pathak & Bhardwaj*, United States Court of Appeals, 9<sup>th</sup>  
15 Circuit, case no. 13-17553 (13-cv-03947).<sup>14</sup>

16 COUNT TEN

17 Case No. 14-O-00848

18 Business and Professions Code, section 6068(c)

19 [Maintaining an Unjust Action]

20 11. Between on or about July 10, 2012, and on or about December 14, 2013, respondent  
21 failed to maintain such action, proceedings, or defenses only as appear to respondent legal or just  
22 by filing and pursuing on behalf of himself the following actions or proceedings that lacked  
23 merit and were filed for an improper purpose and for purpose of delay, in willful violation of  
24 Business and Professions Code, section 6068(c):

- 25 A) Motion for Realty Division Under Reserve Jurisdiction, Stay, Move Venue and  
26 Continue Hearing, filed on or about July 10, 2012 in the *Marriage of Anupama*  
27 *and Sanjay Bhardwaj*, filed in the Alameda County Superior Court, case no.

28 <sup>12</sup> Dismissed on or about November 7, 2013.

<sup>13</sup> Remand granted or about November 25, 2013.

<sup>14</sup> Dismissed on or about January 16, 2014.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

FF08380050;

- B) Respondent's Objections to Minute Order for September 26, 2012 Hearing, filed on or about October 1, 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County Superior Court, case no. FF08380050;
- C) Respondent's Notice of Appeal, filed on or about October 3, 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County Superior Court, case no. FF08380050 [California Court of Appeal, First Appellate District, *Anupama Pathak v. Sanjay Bhardwaj*, case no. A136756, lodged October 9, 2012];<sup>15</sup>
- D) Respondent's Request for an Order requesting a stay, filed on or about October 12, 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County Superior Court, case no. FF08380050;
- E) Respondent's Objections to the Order After Hearing, filed on or about October 16, 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County Superior Court, case no. FF08380050;
- F) Respondent's Request for a Temporary Emergency Court Order, filed on or about October 17, 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County Superior Court, case no. FF08380050;
- G) Respondent's Amended Notice of Appeal, filed on or about October 17, 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County Superior Court, case no. FF08380050 [*Anupama Pathak v. Sanjay Bhardwaj*, California Court of Appeal, First Appellate District, case nos. A136756, lodged October 19, 2012];
- H) Respondent's Petition for Writ of Stay, filed on or about October 19, 2012 in *Anupama Pathak v. Sanjay Bhardwaj*, in the California Court of Appeal, First Appellate District, case nos. A136756;

---

<sup>15</sup> Appeal dismissed on or about February 7, 2013.

- 1 I) Respondent's Amended Ex Parte Request for Reconsideration of Temporary  
2 Orders (Stay) and for Order Alleging Mistake of Law/Fact; respondent's  
3 Arguments in Support of OSC; and respondent's Objections to Order After  
4 Hearing re Possession and Writ of Execution filed on or about October 22, 2012  
5 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County  
6 Superior Court, case no. FF08380050;
- 7 J) Respondent's Appellant's Petition for Review from Interlocutory Order on  
8 Summary Denial of Stay Pending Appeal, filed on or about October 30, 2012 in  
9 *Anupama Pathak v. Sanjay Bhardwaj*, in the California Court of Appeal, First  
10 Appellate District, case nos. A136756 [California Supreme Court Case no.  
11 S206287];<sup>16</sup>
- 12 K) Respondent's Application for Stay from Denial of Stay Pending Appeal from  
13 California Supreme Court<sup>17</sup>, filed on or about November 8, 2012 in *Sanjay*  
14 *Bhardwaj v. Anupama Pathak*, case no. 12A500, S206287  
15 [(A136756)(FF08380050)] filed in the United States Supreme Court;<sup>18</sup>
- 16 L) Respondent's Claim to Right of Possession, filed on or about November 29, 2012  
17 in *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County  
18 Superior Court, case no. FF08380050;<sup>19</sup>
- 19 M) Respondent's Motion to Quash Writ of Possession, filed on or about December 3,  
20 2012 in *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda  
21 County Superior Court, case no. FF08380050;
- 22 N) Respondent's Objections to Striking Claim of Possession, filed on or about  
23 December 5, 2012 in *Marriage of Anupama and Sanjay Bhardwaj*, filed in the  
24

<sup>16</sup> Petition for Review denied on or about November 2, 2012.

<sup>17</sup> On the court docket, this document is entitled Application for a Stay Pending the Filing and Disposition of a Petition for a Writ of Certiorari.

<sup>18</sup> Application for Stay denied on or about November 19, 2012 (Justice Kennedy); respondent then requested that it be resubmitted to another justice and it was denied again on December 3, 2012 (Justice Breyer).

<sup>19</sup> Claim stricken on or about November 30, 2012.

- 1 Alameda County Superior Court, case no. FF08380050;
- 2 O) Respondent's Complaints for Disqualification of Judge Pulido, filed on or about
- 3 August 1, 2011,<sup>20</sup> March 1, 2012,<sup>21</sup> October 24, 2012,<sup>22</sup> October 26, 2012<sup>23</sup>
- 4 February 7, 2013(with additional pleadings filed on or about February 26,
- 5 2013),<sup>24</sup> in *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda
- 6 County Superior Court, case no. FF08380050;
- 7 P) Respondent's Responsive Declaration to Request for Order, filed on or about
- 8 April 16, 2013 in *Marriage of Anupama and Sanjay Bhardwaj*, filed in the
- 9 Alameda County Superior Court, case no. FF08380050;
- 10 Q) Respondent's Complaint in Interpleader, filed on or about May 29, 2013 in *First*
- 11 *American Title Company v. Anupama Pathak and Sanjay Bhardwaj*, Alameda
- 12 Superior Court; case no. HG13681389;<sup>25</sup>
- 13 R) Respondent's federal lawsuit, filed on or about August 16, 2013 in *Bhardwaj v.*
- 14 *Pathak, Pulido, Nixon, ACSC, Thorndal, Grewal, Ahern, White, Coldwell Banker,*
- 15 *First American Title, Kaur & Dhami*, filed in the United States District Court
- 16 (Northern California) case no. 13-cv-03807;<sup>26</sup>
- 17 S) Respondent's notice of filing Notice of Removal, filed on or about August 26,
- 18 2013 in *First American Title Co. v. Pathak & Bhardwaj*, Alameda Superior Court
- 19 case no. HG13681389, filed in the United States District Court (Northern
- 20 California) case no. 13-cv-03947;<sup>27</sup>
- 21 T) Respondent's federal appeal, filed on or about December 4, 2013 in *Bhardwaj v.*
- 22 *Pathak, Pulido, Nixon, ACSC, Thorndal, Grewal, Ahern, White, Coldwell Banker,*
- 23

24 <sup>20</sup> Denied on or about August 4, 2011.

25 <sup>21</sup> Denied on or about March 5, 2012.

26 <sup>22</sup> Denied on or about October 25, 2012.

27 <sup>23</sup> Denied on or about December 14, 2012.

28 <sup>24</sup> Denied on or about March 1, 2013.

<sup>25</sup> This interpleader case was consolidated with *Marriage of Bhardwaj* on July 17, 2013 by way of Order After hearing dated July 26, 2013.

<sup>26</sup> Dismissed on or about November 7, 2013.

<sup>27</sup> Remand granted on or about November 25, 2013.

1 *First American Title, Kaur & Dhami*, United States Court of Appeals, 9<sup>th</sup> Circuit,  
2 case no. 13-17498 (13-cv-03807); and

3 U) Respondent's federal appeal, filed on or about December 14, 2013 in *First*  
4 *American Title Co. v. Pathak & Bhardwaj*, United States Court of Appeals, 9<sup>th</sup>  
5 Circuit, case no. 13-17553 (13-cv-03947).<sup>28</sup>

6 COUNT ELEVEN

7 Case No. 14-O-00848

8 Business and Professions Code, section 6106

9 [Moral Turpitude – Bad Faith Non-compliance with Court Orders]

10 12. Between on or about September 26, 2012, and on or about December 14, 2013,  
11 respondent filed the following pleadings and took the following actions for the improper purpose  
12 of preventing or delaying the sale of his family residence, or retaliating against others for the sale  
13 of his family residence, in violation of the Court's orders, including the minute order dated on or  
14 about September 26, 2012, the Findings and Order After Hearing, dated on or about October 10,  
15 2012, and the Court's Emergency Temporary Order dated October 10, 2012, to cooperate with  
16 the sale of the marital property in *Marriage of Anupama and Sanjay Bhardwaj*, Alameda County  
17 Superior Court, case no. FF08380050, and to vacate the property located at 701 Bodega Court in  
18 Fremont, California, within two weeks of the date the Emergency Temporary Order dated  
19 October 10, 2012, and respondent thereby committed acts of moral turpitude, dishonesty or  
20 corruption in willful violation of Business and Professions Code, section 6106:

21 A. Respondent's Objections to Minute Order for September 26, 2012 Hearing, filed on  
22 or about October 1, 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in  
23 the Alameda County Superior Court, case no. FF08380050;

24 B. Respondent's Notice of Appeal, filed on or about October 3, 2012 in the *Marriage of*  
25 *Anupama and Sanjay Bhardwaj*, filed in the Alameda County Superior Court, case  
26 no. FF08380050 [California Court of Appeal, First Appellate District, *Anupama*  
27 *Pathak v. Sanjay Bhardwaj*, case nos. A136756, lodged October 9, 2012];<sup>29</sup>

28 <sup>28</sup> Dismissed on or about January 16, 2014.

29 <sup>29</sup> Appeal dismissed on or about February 7, 2013.

- 1 C. Respondent's Request for an Order requesting a stay, filed on or about October 12,  
2 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County  
3 Superior Court, case no. FF08380050;
- 4 D. Respondent's Objections to the Order After Hearing, filed on or about October 16,  
5 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County  
6 Superior Court, case no. FF08380050;
- 7 E. Respondent's Request for a Temporary Emergency Court Order, filed on or about  
8 October 17, 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the  
9 Alameda County Superior Court, case no. FF08380050;
- 10 F. Respondent's Amended Notice of Appeal, filed on or about October 17, 2012 in the  
11 *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County Superior  
12 Court, case no. FF08380050 [*Anupama Pathak v. Sanjay Bhardwaj*, California Court  
13 of Appeal, First Appellate District, case nos. A136756, lodged October 19, 2012];
- 14 G. Respondent's Petition for Writ of Stay, filed on or about October 19, 2012 in  
15 *Anupama Pathak v. Sanjay Bhardwaj*, in the California Court of Appeal, First  
16 Appellate District, case nos. A136756;
- 17 H. Respondent's Amended Ex Parte Request for Reconsideration of Temporary Orders  
18 (Stay) and for Order Alleging Mistake of Law/Fact; respondent's Arguments in  
19 Support of OSC; and respondent's Objections to Order After Hearing re Possession  
20 and Writ of Execution, filed on or about October 22, 2012 in the *Marriage of*  
21 *Anupama and Sanjay Bhardwaj*, filed in the Alameda County Superior Court, case  
22 no. FF08380050;
- 23 I. Respondent's Appellant's Petition for Review from Interlocutory Order on Summary  
24 Denial of Stay Pending Appeal, filed on or about October 30, 2012 in *Anupama*  
25 *Pathak v. Sanjay Bhardwaj*, in the California Court of Appeal, First Appellate  
26 District, case nos. A136756 [California Supreme Court Case no. S206287];<sup>30</sup>

27  
28 <sup>30</sup> Petition for Review denied on or about November 2, 2012.

- 1 J. Respondent's Application for Stay from Denial of Stay Pending Appeal from  
2 California Supreme Court<sup>31</sup>, filed on or about November 8, 2012 in *Sanjay Bhardwaj*  
3 *v. Anupama Pathak*, case no. 12A500, S206287 [(A136756)(FF08380050)] filed in  
4 the United States Supreme Court;<sup>32</sup>
- 5 K. Respondent's Claim to Right of Possession, filed on or about November 29, 2012 in  
6 *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County Superior  
7 Court, case no. FF08380050;<sup>33</sup>
- 8 L. Respondent's Motion to Quash Writ of Possession, filed on or about December 3,  
9 2012 in *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County  
10 Superior Court, case no. FF08380050;
- 11 M. Respondent's Objections to Striking Claim of Possession, filed on or about December  
12 5, 2012 in *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County  
13 Superior Court, case no. FF08380050;
- 14 N. Respondent's Complaints for Disqualification of Judge Pulido, filed on or about  
15 August 1, 2011,<sup>34</sup> March 1, 2012,<sup>35</sup> October 24, 2012,<sup>36</sup> October 26, 2012<sup>37</sup> February  
16 7, 2013, (with supplemental pleadings filed on February 26, 2013)<sup>38</sup> in *Marriage of*  
17 *Anupama and Sanjay Bhardwaj*, filed in the Alameda County Superior Court, case  
18 no. FF08380050;
- 19 O. Respondent's Responsive Declaration to Request for Order, filed on or about April  
20 16, 2013 in *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda  
21 County Superior Court, case no. FF08380050;
- 22 P. Respondent's Complaint in Interpleader, filed on or about May 29, 2013 in *First*  
23

24 <sup>31</sup> On the court docket, document is entitled Application for a Stay Pending the Filing and  
25 Disposition of a Petition for a Writ of Certiorari.

26 <sup>32</sup> Application for Stay denied on or about November 19, 2012.

27 <sup>33</sup> Claim stricken on or about November 30, 2012.

28 <sup>34</sup> Denied on or about August 4, 2011.

<sup>35</sup> Denied on or about March 5, 2012.

<sup>36</sup> Denied on or about October 25, 2012.

<sup>37</sup> Denied on or about December 14, 2012.

<sup>38</sup> Denied on or about March 1, 2013.

1 *American Title Company v. Anupama Pathak and Sanjay Bhardwaj*, Alameda  
2 Superior Court; case no. HG13681389;<sup>39</sup>

3 Q. Respondent's federal lawsuit, filed on or about August 16, 2013 in *Bhardwaj v.*  
4 *Pathak, Pulido, Nixon, ACSC, Thorndal, Grewal, Ahern, White, Coldwell Banker,*  
5 *First American Title, Kaur & Dhami*, filed in the United States District Court  
6 (Northern California) case no. 13-cv-03807;<sup>40</sup>

7 R. Respondent's notice of filing Notice of Removal, filed on or about August 26, 2013  
8 in *First American Title Co. v. Pathak & Bhardwaj*, Alameda Superior Court case no.  
9 HG13681389, filed in the United States District Court (Northern California) case no.  
10 13-cv-03947;<sup>41</sup>

11 S. Respondent's federal appeal, filed on or about December 4, 2013 in *Bhardwaj v.*  
12 *Pathak, Pulido, Nixon, ACSC, Thorndal, Grewal, Ahern, White, Coldwell Banker,*  
13 *First American Title, Kaur & Dhami*, United States Court of Appeals, 9<sup>th</sup> Circuit, case  
14 no. 13-17498 (13-cv-03807);

15 T. Respondent's federal appeal, filed on or about December 14, 2013 in *First American*  
16 *Title Co. v. Pathak & Bhardwaj*, United States Court of Appeals, 9<sup>th</sup> Circuit, case no.  
17 13-17553 (13-cv-03947);<sup>42</sup>

18 U. On or about September 28, 2012, respondent sent email to opposing counsel  
19 indicating his refusal to accept the September 26, 2012 court order regarding the sale  
20 of the Fremont residence;

21 V. On or about September 29, 2012 respondent sent emails to the realtor assigned by the  
22 Court, threatening suit if she carried out the sale orders of the court;

23 W. On or about December 26, 2012 respondent recorded a lis pendens against property  
24 located at 701 Bodega Court, Fremont, CA 94593 with the County of Alameda,  
25

26 <sup>39</sup> This interpleader case was consolidated with *Marriage of Bhardwaj* on July 17, 2013 by way  
of Order After Hearing dated July 26, 2013.

27 <sup>40</sup> Dismissed on or about November 7, 2013.

28 <sup>41</sup> Remand granted on or about November 25, 2013.

<sup>42</sup> Dismissed on or about January 16, 2014.

1 which was expunged by order of the Court dated on or about February 8, 2013;  
2 X. On or about November 29, 2012 respondent filed a claim of right to possession;<sup>43</sup> and  
3 Y. On or about December 5, 2012, respondent refused to leave the family residence,  
4 requiring a forcible eviction from the sheriff's office.

5 COUNT TWELVE  
6 Case No. 14-O-00848  
7 Business and Professions Code, section 6068(b)  
8 [Failure to Maintain Respect with the Court]

9 13. Between on or about September 26, 2012, and on or about December 14, 2014,  
10 respondent filed the following pleadings and took the following actions for the improper purpose  
11 of preventing or delaying the sale of his family residence, or retaliating against others for the sale  
12 of his family residence, in violation of the Court's orders, including the minute order dated on or  
13 about September 26, 2012, the Findings and Order After Hearing, dated on or about October 10,  
14 2012, and the Court's Emergency Temporary Order dated on or about October 10, 2012, to  
15 cooperate with the sale of the marital property in *Marriage of Anupama and Sanjay Bhardwaj*,  
16 Alameda County Superior Court, case no. FF08380050, and to vacate the property located at 701  
17 Bodega Court in Fremont, California, within two weeks of the date the Emergency Temporary  
18 Order dated October 10, 2012, and respondent thereby failed to maintain respect due to the  
19 courts of justice and judicial officers in willful violation of Business and Professions Code,  
20 section 6068(b).

21 A. Respondent's Objections to Minute Order for September 26, 2012 Hearing, filed on  
22 or about October 1, 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in  
23 the Alameda County Superior Court, case no. FF08380050;

24 B. Respondent's Notice of Appeal, filed on or about October 3, 2012 in the *Marriage of*  
25 *Anupama and Sanjay Bhardwaj*, filed in the Alameda County Superior Court, case  
26 no. FF08380050 [California Court of Appeal, First Appellate District, *Anupama*  
27 *Pathak v. Sanjay Bhardwaj*, case nos. A136756, lodged October 9, 2012];<sup>44</sup>

28 <sup>43</sup> Claim stricken on or about November 30, 2012

<sup>44</sup> Appeal dismissed on or about February 7, 2013.

- 1 C. Respondent's Request for an Order requesting a stay, filed on or about October 12,  
2 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County  
3 Superior Court, case no. FF08380050;
- 4 D. Respondent's Objections to the Order After Hearing, filed on or about October 16,  
5 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County  
6 Superior Court, case no. FF08380050;
- 7 E. Respondent's Request for a Temporary Emergency Court Order, filed on or about  
8 October 17, 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the  
9 Alameda County Superior Court, case no. FF08380050;
- 10 F. Respondent's Amended Notice of Appeal, filed on or about October 17, 2012 in the  
11 *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County Superior  
12 Court, case no. FF08380050 [*Anupama Pathak v. Sanjay Bhardwaj*, California Court  
13 of Appeal, First Appellate District, case nos. A136756, lodged October 19, 2012];
- 14 G. Respondent's Petition for Writ of Stay, filed on or about October 19, 2012 in  
15 *Anupama Pathak v. Sanjay Bhardwaj*, in the California Court of Appeal, First  
16 Appellate District, case nos. A136756;
- 17 H. Respondent's Amended Ex Parte Request for Reconsideration of Temporary Orders  
18 (Stay) and for Order Alleging Mistake of Law/Fact; respondent's Arguments in  
19 Support of OSC; and respondent's Objections to Order After Hearing re Possession  
20 and Writ of Execution, filed on or about October 22, 2012 in the *Marriage of*  
21 *Anupama and Sanjay Bhardwaj*, filed in the Alameda County Superior Court, case  
22 no. FF08380050;
- 23 I. Respondent's Appellant's Petition for Review from Interlocutory Order on Summary  
24 Denial of Stay Pending Appeal, filed on or about October 30, 2012 in *Anupama*  
25 *Pathak v. Sanjay Bhardwaj*, in the California Court of Appeal, First Appellate  
26 District, case nos. A136756 [California Supreme Court Case no. S206287];<sup>45</sup>

27  
28 <sup>45</sup> Petition for Review denied on or about November 2, 2012.

- 1 J. Respondent's Application for Stay from Denial of Stay Pending Appeal from  
2 California Supreme Court<sup>46</sup>, filed on or about November 8, 2012 in *Sanjay Bhardwaj*  
3 *v. Anupama Pathak*, case no. 12A500, S206287 [(A136756)(FF08380050)] filed in  
4 the United States Supreme Court;<sup>47</sup>
- 5 K. Respondent's Claim to Right of Possession, filed on or about November 29, 2012 in  
6 *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County Superior  
7 Court, case no. FF08380050;<sup>48</sup>
- 8 L. Respondent's Motion to Quash Writ of Possession, filed on or about December 3,  
9 2012 in *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County  
10 Superior Court, case no. FF08380050;
- 11 M. Respondent's Objections to Striking Claim of Possession, filed on or about December  
12 5, 2012 in *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County  
13 Superior Court, case no. FF08380050;
- 14 N. Respondent's Complaints for Disqualification of Judge Pulido, filed on or about  
15 August 1, 2011,<sup>49</sup> March 1, 2012,<sup>50</sup> October 24, 2012,<sup>51</sup> October 26, 2012<sup>52</sup> February  
16 7, 2013 (with supplemental briefing filed on February 26, 2013)<sup>53</sup> in *Marriage of*  
17 *Anupama and Sanjay Bhardwaj*, filed in the Alameda County Superior Court, case  
18 no. FF08380050;
- 19 O. Respondent's Responsive Declaration to Request for Order, filed on or about April  
20 16, 2013 in *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda  
21 County Superior Court, case no. FF08380050;
- 22 P. Respondent's Complaint in Interpleader, filed on or about May 29, 2013 in *First*  
23

24 <sup>46</sup> On docket, document is entitled Application for a Stay Pending the Filing and Disposition of a  
25 Petition for a Writ of Certiorari.

26 <sup>47</sup> Application for Stay denied on or about November 19, 2012.

27 <sup>48</sup> Claim stricken on or about November 30, 2012.

28 <sup>49</sup> Denied on or about August 4, 2011.

<sup>50</sup> Denied on or about March 5, 2012.

<sup>51</sup> Denied on or about October 25, 2012.

<sup>52</sup> Denied on or about December 14, 2012.

<sup>53</sup> Denied March 1, 2013.

1            *American Title Company v. Anupama Pathak and Sanjay Bhardwaj*, Alameda  
2            Superior Court; case no. HG13681389;<sup>54</sup>

3            Q. Respondent's federal lawsuit, filed on or about August 16, 2013 in *Bhardwaj v.*  
4            *Pathak, Pulido, Nixon, ACSC, Thorndal, Grewal, Ahern, White, Coldwell Banker,*  
5            *First American Title, Kaur & Dhami*, filed in the United States District Court  
6            (Northern California) case no. 13-cv-03807;<sup>55</sup>

7            R. Respondent's notice of filing Notice of Removal, filed on or about August 26, 2013  
8            in *First American Title Co. v. Pathak & Bhardwaj*, Alameda Superior Court case no.  
9            HG13681389, filed in the United States District Court (Northern California) case no.  
10           13-cv-03947;<sup>56</sup>

11           S. Respondent's federal appeal, filed on or about December 4, 2013 in *Bhardwaj v.*  
12           *Pathak, Pulido, Nixon, ACSC, Thorndal, Grewal, Ahern, White, Coldwell Banker,*  
13           *First American Title, Kaur & Dhami*, United States Court of Appeals, 9<sup>th</sup> Circuit, case  
14           no. 13-17498 (13-cv-03807);

15           T. Respondent's federal appeal, filed on or about December 14, 2013 in *First American*  
16           *Title Co. v. Pathak & Bhardwaj*, United States Court of Appeals, 9<sup>th</sup> Circuit, case no.  
17           13-17553 (13-cv-03947);<sup>57</sup>

18           U. On or about September 28, 2012, respondent sent email to opposing counsel  
19           indicating his refusal to accept the September 26, 2012 court order regarding the sale  
20           of the Fremont residence;

21           V. On or about September 29, 2012 respondent sent emails to the realtor assigned by the  
22           Court, threatening suit if she carried out the sale orders of the court; and

23           W. On or about December 26, 2012 respondent recorded a lis pendens against property  
24           located at 701 Bodega Court, Fremont, CA 94593 with the County of Alameda,

25  
26           <sup>54</sup> This interpleader case was consolidated with *Marriage of Bhardwaj* on July 17, 2013 by way  
27           of Order After Hearing dated July 26, 2013.

28           <sup>55</sup> Dismissed on or about November 7, 2013.

<sup>56</sup> Remand granted on or about November 25, 2013.

<sup>57</sup> Dismissed on or about January 16, 2014.

1 which was expunged by order of the Court dated February 8, 2013;

2 X. On or about November 29, 2012 respondent filed a claim of right to possession;<sup>58</sup> and

3 Y. On or about December 5, 2012, respondent refused to leave the family residence,  
4 requiring eviction from the sheriff's office.

5 COUNT THIRTEEN

6 Case No. 14-O-00848

7 Business and Professions Code, section 6068(a)

8 [Failure to Comply With Laws]

9 14. Between on or about September 26, 2012, and on or about December 14, 2014,  
10 respondent filed the following pleadings and took the following actions for the improper purpose  
11 of preventing or delaying the sale of his family residence, or retaliating against others for the sale  
12 of his family residence, in violation of the Court's orders, including the minute order dated on or  
13 about September 26, 2012, the Findings and Order After Hearing, dated on or about October 10,  
14 2012, and the Court's Emergency Temporary Order dated on or about October 10, 2012, to  
15 cooperate with the sale of the marital property in *Marriage of Anupama and Sanjay Bhardwaj*,  
16 Alameda County Superior Court, case no. FF08380050, and to vacate the property located at 701  
17 Bodega Court in Fremont, California, within two weeks of the date the Emergency Temporary  
18 Order dated October 10, 2012, and respondent thereby failed to comply with the law in willful  
19 violation of Business and Professions Code, section 6068(a):

20 A. Respondent's Objections to Minute Order for September 26, 2012 Hearing, filed on  
21 or about October 1, 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in  
22 the Alameda County Superior Court, case no. FF08380050;

23 B. Respondent's Notice of Appeal, filed on or about October 3, 2012 in the *Marriage of*  
24 *Anupama and Sanjay Bhardwaj*, filed in the Alameda County Superior Court, case  
25 no. FF08380050 [California Court of Appeal, First Appellate District, *Anupama*  
26 *Pathak v. Sanjay Bhardwaj*, case nos. A136756, lodged October 9, 2012];<sup>59</sup>

27 C. Respondent's Request for an Order requesting a stay, filed on or about October 12,

28 <sup>58</sup> Claim stricken on or about November 30, 2012.

<sup>59</sup> Appeal dismissed on or about February 7, 2013.

- 1           2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County  
2           Superior Court, case no. FF08380050;
- 3           D. Respondent's Objections to the Order After Hearing, filed on or about October 16,  
4           2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County  
5           Superior Court, case no. FF08380050;
- 6           E. Respondent's Request for a Temporary Emergency Court Order, filed on or about  
7           October 17, 2012 in the *Marriage of Anupama and Sanjay Bhardwaj*, filed in the  
8           Alameda County Superior Court, case no. FF08380050;
- 9           F. Respondent's Amended Notice of Appeal, filed on or about October 17, 2012 in the  
10          *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County Superior  
11          Court, case no. FF08380050 [*Anupama Pathak v. Sanjay Bhardwaj*, California Court  
12          of Appeal, First Appellate District, case nos. A136756, lodged October 19, 2012];
- 13          G. Respondent's Petition for Writ of Stay, filed on or about October 19, 2012 in  
14          *Anupama Pathak v. Sanjay Bhardwaj*, in the California Court of Appeal, First  
15          Appellate District, case nos. A136756;
- 16          H. Respondent's Amended Ex Parte Request for Reconsideration of Temporary Orders  
17          (Stay) and for Order Alleging Mistake of Law/Fact; respondent's Arguments in  
18          Support of OSC; and respondent's Objections to Order After Hearing re Possession  
19          and Writ of Execution, filed on or about October 20, 2012 in the *Marriage of*  
20          *Anupama and Sanjay Bhardwaj*, filed in the Alameda County Superior Court, case  
21          no. FF08380050;
- 22          I. Respondent's Appellant's Petition for Review from Interlocutory Order on Summary  
23          Denial of Stay Pending Appeal, filed on or about October 30, 2012 in *Anupama*  
24          *Pathak v. Sanjay Bhardwaj*, in the California Court of Appeal, First Appellate  
25          District, case nos. A136756 [California Supreme Court Case no. S206287];<sup>60</sup>
- 26
- 27

28 <sup>60</sup> Petition for Review denied on or about November 2, 2012.

- 1 J. Respondent's Application for Stay from Denial of Stay Pending Appeal from  
2 California Supreme Court<sup>61</sup>, filed on or about November 8, 2012 in *Sanjay Bhardwaj*  
3 *v. Anupama Pathak*, case no. 12A500, S206287 [(A136756)(FF08380050)] filed in  
4 the United States Supreme Court;<sup>62</sup>
- 5 K. Respondent's Claim to Right of Possession, filed on or about November 29, 2012 in  
6 *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County Superior  
7 Court, case no. FF08380050;<sup>63</sup>
- 8 L. Respondent's Motion to Quash Writ of Possession, filed on or about December 3,  
9 2012 in *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County  
10 Superior Court, case no. FF08380050;
- 11 M. Respondent's Objections to Striking Claim of Possession, filed on or about December  
12 5, 2012 in *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda County  
13 Superior Court, case no. FF08380050;
- 14 N. Respondent's Complaints for Disqualification of Judge Pulido, filed on or about  
15 August 1, 2011,<sup>64</sup> March 1, 2012,<sup>65</sup> October 24, 2012,<sup>66</sup> October 26, 2012<sup>67</sup> February  
16 7, 2013 (with supplemental briefing filed on February 26, 2013),<sup>68</sup> in *Marriage of*  
17 *Anupama and Sanjay Bhardwaj*, filed in the Alameda County Superior Court, case  
18 no. FF08380050;
- 19 O. Respondent's Responsive Declaration to Request for Order, filed on or about April  
20 16, 2013 in *Marriage of Anupama and Sanjay Bhardwaj*, filed in the Alameda  
21 County Superior Court, case no. FF08380050;
- 22 P. Respondent's Complaint in Interpleader, filed on or about May 29, 2013 in *First*  
23

24 <sup>61</sup> On docket, document is entitled Application for a Stay Pending the Filing and Disposition of a  
25 Petition for a Writ of Certiorari.

26 <sup>62</sup> Application for Stay denied on or about November 19, 2012.

27 <sup>63</sup> Claim stricken on or about November 30, 2012.

28 <sup>64</sup> Denied on or about August 4, 2011.

<sup>65</sup> Denied on or about March 5, 2012.

<sup>66</sup> Denied on or about October 25, 2012.

<sup>67</sup> Denied on or about December 14, 2012.

<sup>68</sup> Denied on or about March 1, 2013.

1            *American Title Company v. Anupama Pathak and Sanjay Bhardwaj*, Alameda  
2            Superior Court; case no. HG13681389;<sup>69</sup>

3            Q. Respondent's federal lawsuit, filed on or about August 16, 2013 in *Bhardwaj v.*  
4            *Pathak, Pulido, Nixon, ACSC, Thorndal, Grewal, Ahern, White, Coldwell Banker,*  
5            *First American Title, Kaur & Dhami*, filed in the United States District Court  
6            (Northern California) case no. 13-cv-03807;<sup>70</sup>

7            R. Respondent's notice of filing Notice of Removal, filed on or about August 26, 2013  
8            in *First American Title Co. v. Pathak & Bhardwaj*, Alameda Superior Court case no.  
9            HG13681389, filed in the United States District Court (Northern California) case no.  
10           13-cv-03947,<sup>71</sup>

11           S. Respondent's federal appeal, filed on or about December 4, 2013 in *Bhardwaj v.*  
12           *Pathak, Pulido, Nixon, ACSC, Thorndal, Grewal, Ahern, White, Coldwell Banker,*  
13           *First American Title, Kaur & Dhami*, United States Court of Appeals, 9<sup>th</sup> Circuit, case  
14           no. 13-17498 (13-cv-03807);

15           T. Respondent's federal appeal, filed on or about December 14, 2013 in *First American*  
16           *Title Co. v. Pathak & Bhardwaj*, United States Court of Appeals, 9<sup>th</sup> Circuit, case no.  
17           13-17553 (13-cv-03947);<sup>72</sup>

18           U. On or about September 28, 2012, respondent sent email to opposing counsel  
19           indicating his refusal to accept the September 26, 2012 court order regarding the sale  
20           of the Fremont residence;

21           V. On or about September 29, 2012 respondent sent emails to the realtor assigned by the  
22           Court, threatening suit if she carried out the sale orders of the court;

23           W. On or about December 26, 2012 respondent recorded a lis pendens against property  
24           located at 701 Bodega Court, Fremont, CA 94593 with the County of Alameda,

25  
26           <sup>69</sup> This interpleader case was consolidated with *Marriage of Bhardwaj* on July 17, 2013 by way  
27           of Order After Hearing dated July 26, 2013.

27           <sup>70</sup> Dismissed on or about November 7, 2013.

27           <sup>71</sup> Remand granted on or about November 25, 2013.

28           <sup>72</sup> Dismissed on or about January 16, 2014.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

which was expunged by order of the Court dated February 8, 2013;

X. On or about November 29, 2012 respondent filed a claim of right to possession;<sup>73</sup>

and

Y. On or about December 5, 2012, respondent refused to leave the family residence, requiring eviction from the sheriff's office.

**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.**

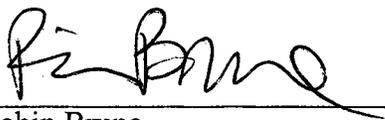
**NOTICE - COST ASSESSMENT!**

**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: June 6, 2016

By:   
\_\_\_\_\_  
Robin Brune  
Senior Trial Counsel

<sup>73</sup> Claim stricken on or about November 30, 2012.

DECLARATION OF SERVICE

by

U.S. FIRST-CLASS MAIL / U.S. CERTIFIED MAIL / OVERNIGHT DELIVERY / FACSIMILE-ELECTRONIC TRANSMISSION

CASE NUMBER(s): 14-O-00848

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:

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 San Francisco.



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 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 4851 92 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)

Person Served	Business-Residential Address	Fax Number	Courtesy Copy to:
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: June 6, 2016

SIGNED:

Dawn Williams

Dawn Williams  
Declarant