

1 David C. Carr, Bar No. 124510  
2 KLINEDINST PC  
3 501 West Broadway, Suite 600  
4 San Diego, California 92101  
5 (619) 239-8131/FAX (619) 238-8707  
6 dcarr@klinedinstlaw.com

7 Attorneys for Respondent  
8 PAUL CARSON GARNER

**FILED**  
AUG 16 2016  
STATE BAR COURT  
CLERK'S OFFICE  
LOS ANGELES

9 **STATE BAR COURT**  
10 **HEARING DEPARTMENT - LOS ANGELES**

11 In the Matter of  
12 PAUL CARSON GARNER  
13 no. 132524  
14 A Member of the State Bar

Case No. 15-C-13117 YDR

**RESPONSE TO NOTICE OF HEARING ON  
CONVICTION**

**[Rule of Procedure 5.345(B)]**

15 Address for Service

16 Service should be made on Respondent's counsel at address above.

17 Response to Issues Stated in Referral Order

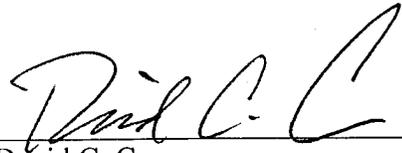
18 Respondent denies that the conduct underlying the conviction involved moral turpitude, either  
19 inherently or in the surrounding circumstances.

20 Respondent denies that conduct underlying the conviction constituted other misconduct  
21 warranting discipline.

22 Respectfully Submitted,

23 KLINEDINST PC

24  
25 DATED: August 15, 2016

26 By: 

27 David C. Carr  
28 Attorneys for Respondent  
PAUL CARSON GARNER

16738192v1



1 David C. Carr, Bar No. 124510  
2 KLINEDINST PC  
3 501 West Broadway, Suite 600  
4 San Diego, California 92101  
(619) 239-8131/FAX (619) 238-8707  
dcarr@klinedinstlaw.com

5 Attorneys for Respondent  
6 PAUL CARSON GARNER

**FILED**

AUG 16 2016

STATE BAR COURT  
CLERK'S OFFICE  
LOS ANGELES

8 **STATE BAR COURT**  
9 **HEARING DEPARTMENT - LOS ANGELES**

11 In the Matter of

Case No. 15-C-13117 YDR

12 PAUL CARSON GARNER  
13 no. 132524

**PROOF OF SERVICE**

Trial Date: None set.

14 A Member of the State Bar.

16 I declare that:

17 I am and was at the time of service of the papers herein, over the age of eighteen (18)  
18 years and am not a party to the action. I am employed in the County of San Diego, and my  
business address is 501 West Broadway, Suite 600, San Diego, California.

19 On August 15, 2016, I caused to be served the following documents:

20 **RESPONSE TO NOTICE OF HEARING ON CONVICTION.**

- 21  **VIA FACSIMILE TRANSMISSION:** (Code Civ. Proc. §§ 1013(e) and (f)): From fax  
22 number (619) 238-8707 to the fax numbers listed below and/or on the attached service list.  
23 The facsimile machine I used complied with Rule 2.306 and no error was reported by the  
machine.
- 24  **VIA ELECTRONIC TRANSMISSION:** Complying with an agreement with all parties, I  
25 caused the document(s) to be sent to the person(s) at the e-mail address(es) listed below. I  
26 did not receive, within a reasonable time after transmission, any electronic message or other  
27 indication that the transmission was unsuccessful. My electronic service address is  
khamilton@klinedinstlaw.com. A copy of the sent email will be maintained with the  
28 original document(s) in our office. (Code Civ. Proc. § 1010.6 and Cal. Rules of Court, Rule  
2.251)

KLINEDINST PC  
501 WEST BROADWAY, SUITE 600  
SAN DIEGO, CALIFORNIA 92101

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

- VIA ELECTRONIC FILING SERVICE:** Complying with Code of Civil Procedure section 1010.6, my electronic business address is khamilton@klinedinstlaw.com and I caused such document(s) to be electronically served through the \_\_\_\_\_ system for the above-entitled case to those parties on the Service List maintained on its website for this case. The file transmission was reported as complete and a copy of the Filing/Service Receipt will be maintained with the original document(s) in our office.
- VIA MAIL:** By placing a copy thereof for delivery in a separate envelope addressed to each addressee, respectively, as follows:
  - BY FIRST-CLASS MAIL (Code of Civ. Proc. §§ 1013 and 1013(a))**
  - BY OVERNIGHT DELIVERY (Code Civ. Proc. §§ 1013(c) and (d))**
  - BY CERTIFIED RETURN RECEIPT MAIL (Code of Civ. Proc. §§ 1013 and 1013(a))**

Deputy Trial Counsel Shane Morrison Office of the Chief Trial Counsel The State Bar of California 845 South Figueroa Street Los Angeles CA 90017	Email: shane.morrison@calbar.ca.gov
--------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with the United States Postal Service on that same day with postage thereon fully prepaid at San Diego, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.

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

Executed on August 15, 2016, at San Diego, California.



Karla M. Hamilton

16738223v1