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LAW OFFICES OF  
**TIMOTHY V. MILNER**  
3055 Wilshire Boulevard, Suite 805  
LOS ANGELES, CALIFORNIA 90010  
TELEPHONE (213)382-1195  
FACSIMILE (213)351-1049  
SBN: 109648

**FILED**

**MAR 16 2016**

STATE BAR COURT  
CLERK'S OFFICE  
LOS ANGELES

Attorney for: VICTOR JACOBVITZ  
Respondent

STATE BAR COURT OF CALIFORNIA  
LOS ANGELES HEARING DEPARTMENT

In the Matter of: ) Case No. 15-O-10548; 15-O-12276-DFM  
VICTOR JACOBVITZ, ) Assigned to the Hon. Donald F. Miles  
Member No.: 66297 ) RESPONDENT VICTOR JACOBVITZ'  
A Member of the State Bar. ) ANSWER TO NOTICE OF DISCIPLINARY  
CHARGES

Victor Jacobovitz (hereinafter "Respondent") answers the State Bar of California's Notice of Disciplinary Charges ("Complaint") alleging violations of California Rules of Professional Conduct, Rule 4-100(A) and Business and Professions Code §6106.

DENIAL

Pursuant to Code of Civil Procedure §431.30(d), Respondent hereby answers the Notice of Disciplinary Charges by denying paragraphs 6, 7 and 8 of said charges and admits to paragraphs 1, 2, 3, 4 and 5 of said charges, and admits in part paragraph 9 but denies the accuracy of the findings or that Respondent's acts should have caused the discipline imposed.

AFFIRMATIVE DEFENSES TO DISCIPLINARY CHARGES

As separate and distinct affirmative defenses to the State Bar of California's Notice of Disciplinary Charges, Respondent alleges as follows:

FIRST AFFIRMATIVE DEFENSE

The Complaint fails to state sufficient facts to support any ethics violations or to support any disciplinary action or any other action.



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LAW OFFICES OF TIMOTHY V. MILNER

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1 **PROOF OF SERVICE**

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

5 I am a citizen of the United States and employed in the County of Los Angeles. I am over the age of eighteen years and not a party to the within action. My business address is 3055 Wilshire Boulevard, Suite 805, Los Angeles, California 90010.

6 On March 16, 2016, at Los Angeles, California, I served the foregoing document described as:  
7 **ANSWER TO COMPLAINT** on the interested parties in this action by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

8 STATE BAR OF CALIFORNIA  
9 Office of Chief Trial Counsel  
10 845 South Figueroa Street  
11 Los Angeles, California 90017-2515  
Attn: Drew Massey, Esq.  
Deputy Trial Counsel

12 ☐ **BY U.S. MAIL** I caused such envelope to be deposited in the mail, with postage thereon fully prepaid, at Los Angeles, California. [I am "readily familiar" with this firm's practice of collection and processing correspondence for mailing. It is deposited with the U.S. Postal Service on that same day in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if the postal cancellation date or postage meter date is more than one (1) day after the date of deposit for mailing in the affidavit.]

15 ☒ **BY PERSONAL SERVICE** I personally delivered such envelope to the offices of the addressee.

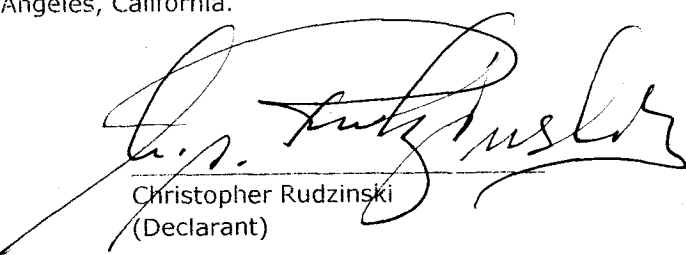
16 ☐ **BY MESSENGER** I, the undersigned, am a citizen of the United States, a resident of the County of Los Angeles, State of California, over the age of eighteen years, and not a party to the within action. I am employed by FOX/FAST DELIVERY MESSENGER SERVICE, located at 122 N. Glendale Boulevard, Los Angeles, CA 90026. I delivered such envelope by hand to the office of the addressee.

19 ☐ **BY FACSIMILE** I transmitted a true copy of said document by facsimile machine, pursuant to Rule 2005. The facsimile machine I used complied with Rule 2003(3) and no error was reported by the machine. Pursuant to Rule 2005(k), I caused the machine to print a transmission record of the transmission. Said fax transmission(s) was/were completed on the above date.

21 ☒ **(STATE)** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

23 ☐ **(FEDERAL)** I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

24 Executed on March 16, 2016, at Los Angeles, California.

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Christopher Rudzinski  
(Declarant)