

1 LAW OFFICES OF SMAUEL R. SPIRA  
2 SAMUEL R. SPIRA (SBN 175983)  
3 8265 Sunset Blvd., Suite 205  
4 Los Angeles, CA 90064  
5 Telephone: (424) 235-0706

6 Attorney In Pro Per for  
7 Samuel Robert Spira

**FILED**

OCT 15 2015

STATE BAR COURT  
CLERK'S OFFICE  
LOS ANGELES

8  
9 STATE BAR COURT  
10 HEARING DEPARTMENT – LOS ANGELES  
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12  
13 IN THE MATTER OF:

14 SAMUEL ROBERT SPIRA,  
15 No. 175983,

16 A MEMBER OF THE STATE BAR  
17  
18

**ANSWER OF SAMUEL R. SPIRA TO  
NOTICE OF DISCIPLINARY CHARGES**

Case No.: 15-O-11209

19 Samuel R. Spira ("Spira"), hereby responds to the Notice of Disciplinary Charges ("NDC")  
20 on behalf of himself, as follows:

- 21 1. In response to paragraph 1 of the NDC, Spira admits all of the allegations therein.  
22 2. In response to paragraph 2 of the NDC, Spira specifically and generally denies each  
23 and every allegation contained therein.  
24 3. In response to paragraph 3 of the NDC, Spira specifically and generally denies each  
25 and every allegation contained therein. If anything, at all times pertinent, Spira communicated  
26 with the State Bar (and its overzealous and unusually hostile investigator, Chin Eronobi) and  
27 attempted to continue such communications with the State Bar concerning the format of specific  
28 answers, certain specific privacy objections and the general procedure for the status of the

1 purported investigation as well as the unexpected actual filing of the NDC without actually  
2 receiving the mandated 20-day pre-filing notice.

3  
4 FIRST AFFIRMATIVE DEFENSE

5 (Estoppel)

6 1. As a separate and affirmative defense, Spira alleges that the State Bar's claims are  
7 barred or diminished by the doctrine of estoppel.

8  
9 SECOND AFFIRMATIVE DEFENSE

10 (Waiver)

11 2. As a separate and affirmative defense, Spira alleges that the State Bar's claims are  
12 barred or diminished by the doctrine of waiver.

13  
14 THIRD AFFIRMATIVE DEFENSE

15 (Unclean Hands)

16 3. As a separate and affirmative defense, Spira alleges that the State Bar's claims are  
17 barred or diminished by the doctrine of unclean hands.

18  
19 FOURTH AFFIRMATIVE DEFENSE

20 (Laches)

21 4. As a separate and affirmative defense, Spira alleges that the State Bar's claims are  
22 barred or diminished by the doctrine of laches.

23  
24 FIFTH AFFIRMATIVE DEFENSE

25 (Statute of Limitations)

26 5. As a separate and affirmative defense, Spira alleges that The State Bar's claims are  
27 barred by the applicable statutes of limitations.

1 SIXTH AFFIRMATIVE DEFENSE

2 (Constitutional Privacy Objection)

3 6. As a separate and affirmative defense, Spira asserts his Constitutional right of  
4 privacy on behalf of himself and his immediate family members who are minor children.

5  
6 WHEREFORE, Spira prays for judgment as follows:

- 7 1. That the State Bar take nothing by virtue of the NDC;  
8 2. That the claims be dismissed, with prejudice, as to Spira; and  
9 3. That, if applicable, Spira be awarded his costs of defense and such further relief as  
10 this Court deems just and proper.

11  
12 Dated: October 15, 2015

Law Offices of Samuel R. Spira  
Samuel R. Spira

13  
14  
15 By: 

Samuel R. Spira  
Attorney in Pro Per

1 **PROOF OF SERVICE**  
2 **1013A(3) C.C.P.**

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

5 I am employed in the County of Los Angeles, State of California; I am over the age of 18  
6 and not a party to the within action; my business address is 8265 Sunset Blvd., Suite 205, Los  
7 Angeles, California 90064.

8 On October 15, 2015, I served the documents described on the attached "List of Documents"  
9 on the interested parties in said action by placing [ ] the original [X] a true copy thereof in a sealed  
envelope(s) addressed as follows:

10 See Attached Service List

11  **BY MAIL**

12 I am "readily familiar" with the firm's practice of collection and processing correspondence for  
13 mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day  
14 with postage thereon fully prepaid at Los Angeles, 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 date after date of deposit for mailing the affidavit.

15  **BY FAX**

16  I faxed such documents pursuant to Los Angeles County Rules of Court, Section 520(c) (4),  
to the fax number(s) listed on the attached service mailing list. And

17  By placing a true copies thereof enclosed in sealed envelope(s) addressed as stated on the  
18 attached service mailing list.

19  **BY PERSONAL SERVICE**

20 I caused such envelope(s) to be delivered by hand to the offices of the addressee(s) noted above.

21 **Executed on October 15, 2015, at Los Angeles, California.**

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

24  **FEDERAL** I declare that I am employed in the office of a member of the bar of this Court  
25 at whose direction the service was made.

26 Sam Spira  
27 Type or Print Name

[Signature]

SERVICE LIST

Drew Massey, Esq.  
Office of the Chief Trial Counsel  
The State Bar of California  
845 S. Figueroa Street  
Los Angeles, CA 90017-2515

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LIST OF DOCUMENTS

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**ANSWER OF SAMUEL ROBERT SPIRA TO NOTICE OF DISCIPLINARY CHARGES**

## DECLARATION OF SERVICE

I, the undersigned, over the age of eighteen, declare that  I am /  am not a party to the within action, in the City and County of Los Angeles, on 10/15/15, served the following document(s):

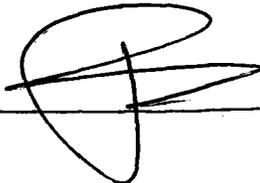
by personal delivery:

DREW MASSEY, ESQ.  
OFFICE OF THE CHIEF TRIAL COUNSEL  
THE STATE BAR OF CALIFORNIA  
845 S. FIGUEROA STREET  
LOS ANGELES, CA. 90017-2515

other:

I declare under penalty of perjury at Los Angeles, California, on the date shown below, that the foregoing is true and correct.

Dated: 10/15/15



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