

1 \$188,000. Mr. Seegmiller succeeded in obtaining recovery from the opposing party in the amount
2 of \$268,000. In addition, Mr. Hall's own insurance company, AAA, paid med-pay payments in the
3 aggregate amount of \$9,429, received in four separate checks received over several months.
4 Mr. Seegmiller ultimately reduced the total amount of medical liens from approximately \$188,000
5 to \$57,927.53.

6 Mr. Seegmiller paid all of the reduced medical liens, promptly distributed his earned fees
7 and reimbursed himself costs advanced during the pendency of the case, and issued a check to Mr.
8 Hall on March 23, 2012 in the amount \$112,047.47. Except for the AAA claim, all of the
9 settlement funds were promptly and properly distributed in 2012. AAA agreed to accept \$5,000 in
10 full satisfaction of its lien. Mr. Seegmiller continued to negotiate with AAA in an effort to persuade
11 AAA to waive any claim to reimbursement, so that the additional monies could be distributed to
12 Mr. Hall. When AAA refused to waive its claim for \$5,000, Mr. Seegmiller agreed to it.

13 Purely as the result of mistake and inadvertence, the AAA lien of \$5,000 was not paid. The
14 funds remained in Mr. Seegmiller's Client Trust Account at all pertinent times. Eventually,
15 unbeknownst to Mr. Seegmiller, AAA hired a collection firm, which filed a lawsuit to collect the
16 original lien, plus interest and attorney fees. A default judgment was entered against Mr. Hall.

17 Once the fact that AAA had filed a lawsuit and gotten a judgment was brought to Mr.
18 Seegmiller's attention, he promptly worked with opposing counsel to have the judgment against
19 Mr. Hall set aside and to have the civil action dismissed with prejudice, in exchange for paying
20 \$10,000 in settlement of the subsequent civil action that AAA's collection agency brought.

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22 **Answer to Specific Allegations Contained in the Notice of Disciplinary Charges**

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24 1. Respondent admits that he was admitted to the practice of law in the State of
25 California on August 21, 1981.

26
27 **COUNT ONE**

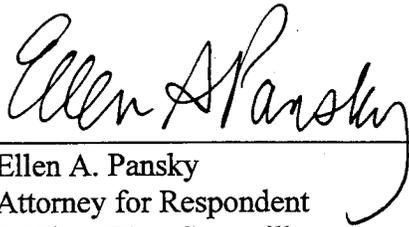
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2 WHEREFORE, Respondent prays that the Court find that Respondent did not commit acts
3 constituting professional misconduct, and that the Notice of Disciplinary Charges be dismissed.
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8 Respectfully submitted,

9 PANSKY MARKLE HAM, LLP

10 Dated: January 8, 2016

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13 By:



14 Ellen A. Pansky
15 Attorney for Respondent
16 William West Seegmiller
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PROOF OF SERVICE

In the Matter of William West Seegmiller

I declare that I am over the age of eighteen (18) and not a party to this action. My business address is 1010 Sycamore Ave., Suite 308, South Pasadena, California 91030.

On January 8, 2016, I served the foregoing document(s) described as:

RESPONSE TO NOTICE OF DISCIPLINARY CHARGES

on all interested parties in this action by placing a true copy of each document, enclosed in a sealed envelope addressed as follows:

Kimberly G. Anderson, Senior Trial Counsel
Office of the Chief Trial Counsel
Enforcement
The State Bar of California
845 S. Figueroa Street
Los Angeles, CA 90017

() **BY MAIL:** as follows: I am "readily familiar" with the firm's practice of collection and processing of correspondence for mailing with the United States Postal Service. I know that the correspondence was deposited with the United States Postal Service on the same day this declaration was executed in the ordinary course of business. I know that the envelope was sealed and, with postage thereon fully prepaid, placed for collection and mailing on this date in the United States mail at South Pasadena, California.

(X) **BY PERSONAL SERVICE:** I personally delivered such envelope addressed to **Kimberly Anderson** to the California State Bar reception desk, on January 8, 2016.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed January 8, 2016, at South Pasadena, California.



Ella Fishman