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FILED

JAN 04 2016

7 Attorneys for Member of the State Bar STATE BAR COURT CLERK'S OFFICE
8 LINNEA NICOLE WILLIS SAN FRANCISCO

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10 STATE BAR COURT
11 STATE BAR OF CALIFORNIA
12 HEARING DEPARTMENT - SAN FRANCISCO

13 In the Matter of
14 LINNEA NICOLE WILLIS
15 SBN #221352

Case No. 15-O-12835

**RESPONSE OF LINNEA WILLIS TO
NOTICE OF DISCIPLINARY CHARGES**

16 A Member of The State Bar

17 1. WILLIS was admitted to practice law in the State of California
18 on December 5, 2002, and has practiced free of discipline since
19 that date.

COUNT ONE

20 2. Battinich employed Willis to represent him. Willis performed
21 competently. There was a dispute over what work was to be done by
22 her as contrasted to work to be done by cocounsel. She denies
23 that she intentionally or recklessly or repeatedly failed to
24 perform competently. She denies that she violated Rule 3-110(A).



1 **COUNT TWO**

2 3. Willis received \$10,000 on account of fees from Battinich.
3 She deposited the funds in trust. She and Battinich disagreed on
4 the amount she should refund to him. The funds remained in trust
5 until the dispute was resolved. She has tendered the remaining
6 amount to him. She denies that she violated Rule 3-700(D)(2) by
7 not returning disputed fees until the dispute was resolved.

8 **COUNT THREE**

9 4. Willis denies that she violated Rule 3-700(D)(1) in the
10 handling of client papers and property after she was terminated.
11

12 **COUNT FOUR**

13 5. Willis maintained adequate communication with the State Bar.
14 She denies violating Bus & Prof 6068(i).
15
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17

18 FISHKIN & SLATTER LLP

19 Date: December 29, 2015

20 By: 

21 JEROME FISHKIN
22 Attorneys for
23 LINNEA WILLIS,

24 Member of the State Bar
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DECLARATION OF SERVICE BY MAIL

I am over the age of 18 years and I am not a party to the within cause. I am employed by Fishkin & Slatter, LLP, and my business address is 1575 Treat Blvd., Walnut Creek, CA 94598, County of Contra Costa. I am readily familiar with the business' practice for collection and processing of correspondence for mailing with the United States Postal Service, and that the correspondence would be deposited with the United States Postal Service that same day in the ordinary course of business. On this day I served the

RESPONSE OF LINNEA WILLIS TO NOTICE OF DISCIPLINARY CHARGES

by placing a true copy in a sealed envelope with postage fully prepaid, and placing the envelope for collection and mailing on this day, following ordinary business practices, in the County of Contra Costa, California, and addressed to:

**Sherrie B. McLetchie DTC
State Bar of California
180 Howard Street
San Francisco, CA 94105-1639**

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

DATE: December 30, 2015

PATRICIA HOEKWATER