

1 **CENTURY LAW GROUP LLP**  
Edward O. Lear, SBN 132699  
2 5200 West Century Boulevard, Suite 345  
Los Angeles, California 90045  
3 Telephone: (310) 642-6900  
4 Facsimile: (310) 642-6910

5 Attorneys for Respondent  
Chukwudum Ndubuisi Emenike  
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**FILED**

**JAN 04 2016**

STATE BAR COURT  
CLERK'S OFFICE  
LOS ANGELES

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8 **STATE BAR COURT**  
9 **HEARING DEPARTMENT – LOS ANGELES**  
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11 In the Matter of )

Case Nos.: 15-O-12919

12 **CHUKWUDUM NDUBUISI EMENIKE,**  
13 **No. 194873** )

**ANSWER TO THE NOTICE OF  
DISCIPLINARY CHARGES**

14 Members of the State Bar.  
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20 **TO: THE STATE BAR COURT OF CALIFORNIA**

21 Pursuant to Rule 5.41 of the Rules of Procedure of the State Bar of California, Respondent  
22 Chukwudum Ndubuisi Emenike, by and through his attorney of record, Edward O. Lear, hereby  
23 submits the following in response to the Notice of Disciplinary Charges on file herein:

24 Respondent was admitted to the practice of law in the State of California on May 14, 1998,  
25 and at all relevant times herein, has been a member of the State Bar of California.

26 Under the provisions of Rules of Procedure of the State Bar of California, Respondent  
27 hereby generally denies each and every allegation of the Notice of Disciplinary Charges and the  
28



1 whole thereof, and further denies that the Respondent has violated any Rule of Professional Conduct  
2 in any manner whatsoever.

3 In response to the specific allegations on information and belief set forth in the Notice of  
4 Disciplinary Charges on file herein, Respondent Chukwudum Ndubuisi Emenike asserts:

5 **JURISDICTION**

6 1. In response to Paragraph 1 of the Notice of Disciplinary Charges (“NDC”),  
7 Respondent admits said allegations.

8 **COUNT ONE**

9 2. Respondent objects to the allegations of Paragraph 2 of the NDC because they are  
10 conclusory, compound, and intertwined with legal conclusions. Notwithstanding said objection,  
11 Respondent denies the allegations contained in Paragraph 2 of the NDC.

12 **COUNT TWO**

13 3. Respondent objects to the allegations of Paragraph 3 of the NDC because they are  
14 conclusory, compound, and intertwined with legal conclusions. Notwithstanding said objection,  
15 Respondent denies the allegations contained in Paragraph 3 of the NDC.

16 **COUNT THREE**

17 4. Respondent objects to the allegations of Paragraph 4 of the NDC because they are  
18 conclusory, compound, and intertwined with legal conclusions. Notwithstanding said objection,  
19 Respondent denies the allegations contained in Paragraph 4 of the NDC.

20 **AFFIRMATIVE DEFENSES**

21 **FIRST AFFIRMATIVE DEFENSE**

22 (Failure to State Sufficient Facts)

23 The Notice of Disciplinary Charges, and each of its purported counts, fails to state facts  
24 sufficient to state a basis for discipline.

25 **SECOND AFFIRMATIVE DEFENSE**

26 (Duplicative Charges)

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**DECLARATION OF SERVICE BY PERSONAL SERVICE**

Re: In the Matter of Chukwudum Ndubuisi Emenike

No.: 15-O-12919

I, Kathy Ferrera, declare:

I am over the age of 18 years and not a party to the within action. My business address is 5200 W. Century Blvd., Suite 345, Los Angeles, California 90045, in the County of Los Angeles.

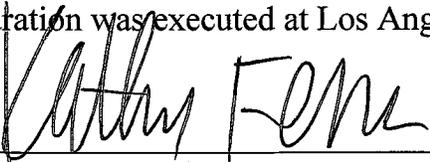
On January 4, 2016 I caused to be personally served, the attached:

**ANSWER TO THE NOTICE OF DISCIPLINARY CHARGES**

On:

Agustin Hernandez Deputy Trial Counsel 845 S. Figueroa Street Los Angeles, CA 90017	
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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and this declaration was executed at Los Angeles, California, on January 4, 2016.

  
\_\_\_\_\_  
Kathy Ferrera