

FILED

MAY 16 2016

STATE BAR COURT
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LOS ANGELES

1 **LAW OFFICES OF PAUL J. VIRGO**
2 **Paul J. Virgo, No. 67900**
3 **9909 Topanga Canyon Boulevard #282**
4 **Chatsworth, CA 91311**
5 **Telephone: (310) 642-6900**

6 **Attorney for Respondent Haley Bayrooti**

7
8 **THE STATE BAR COURT**
9 **HEARING DEPARTMENT - LOS ANGELES**

10 **In the Matter of**

) **Case Nos.: 15-O-14004-DFM**
11) **16-O-10523-DFM**

12 **HALEY BAYROOTI,**

) **RESPONDENT'S ANSWER TO NOTICE**
13) **OF DISCIPLINARY CHARGES**

14 **Respondent**

15 **No. 236791**

16 **A Member of the State Bar**
17 _____

18 **TO THE HONORABLE DONALD F. MILES, JUDGE OF THE STATE BAR COURT**
19 **OF THE STATE BAR OF CALIFORNIA, AND TO DEPUTY TRIAL COUNSEL ALEX**
20 **HACKERT, OFFICE OF THE CHIEF TRIAL COUNSEL OF THE STATE BAR OF**
21 **CALIFORNIA:**

22 **Pursuant to Rule 5.43 of the Rules of Procedure of the State Bar of California,**
23 **Respondent Haley Bayrooti, by and through her attorney(s) of record, hereby submits the**
24 **following response to the Notice of Disciplinary Charges (hereinafter "NDC") on file**
25 **herein:**

26 **-1-**

27 **Under the provisions of the Rules of Procedure of the State Bar of California,**
28 **Respondent Haley Bayrooti hereby responds to each and every allegation of the NDC and**

ANSWER TO NOTICE OF DISCIPLINARY CHARGES

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1 the whole thereof and further denies the Respondent has violated any Rule of Professional
2 Conduct in any manner whatsoever. In response to the specific allegations set forth in the
3 NDC on file herein, Respondent Haley Bayrooti asserts:

4 1. In response to Paragraph 1 of the NDC, Respondent admits said allegations for
5 jurisdictional purposes only.

6 Case No. 15-O-14004

7 COUNT ONE

8 2. In response to Paragraph 2 of the NDC, Respondent denies said allegations.

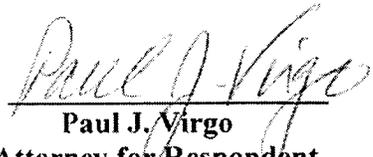
9
10 Case No. 16-O-10523

11 COUNT TWO

12 3. In response to Paragraph 3 of the NDC, Respondent denies said allegations.

13
14 Dated: May 13, 2016

15 Respectfully submitted,

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17 By: 

18 Paul J. Virgo
19 Attorney for Respondent
20 Haley Bayrooti
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DECLARATION OF SERVICE BY MAIL

Re: In the Matter of Haley Bayrooti

Case Nos.: 15-O-14004-DFM and 16-O-10523-DFM

I am over the age of 18 years and not a party to the within action. My business address is 9909 Topanga Canyon Boulevard, #282, Chatsworth, California 91311, in the County of Los Angeles.

On September 21, 2015, I caused to be mailed by U. S. mail

RESPONDENT'S ANSWER TO NOTICE OF DISCIPLINARY CHARGES

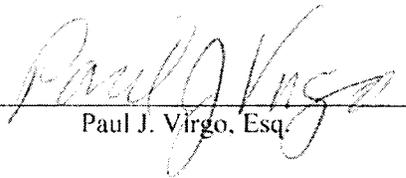
to:

State Bar Court - Hearing Department
State Bar of California
845 S. Figueroa Street
Los Angeles, CA 90017-2515

By mail to:

Alex Hackert, Deputy Trial Counsel
OCTC, Enforcement
845 S. Figueroa Street
Los Angeles, CA 90017-2515

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 Chatsworth, California, on May 13, 2016


Paul J. Virgo, Esq.