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A Professional Corporation  
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5 Attorneys for Respondent Robyn L. Pool

**FILED**

**JUL 26 2016**

**STATE BAR COURT  
CLERK'S OFFICE  
LOS ANGELES**

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10 **STATE BAR COURT**  
11 **HEARING DEPARTMENT – LOS ANGELES**

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14 In the Matter of

15 **ROBYN LYNNETTE POOL**

16  
17 State Bar No. 218837

18 A Member of the State Bar of California.  
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) Case Nos.: 15-O-14777, 15-O-14784  
15-O-15116, 15-O-15124, 15-O-15306,  
15-O-15402 and 15-O-115651

) **RESPONDENT ROBYN L. POOL'S  
RESPONSE TO THE STATE BAR'S  
NOTICE OF DISCIPLINARY CHARGES**

) Assigned to Judge W. Kearse McGill

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27 **TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**  
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1 ROBYN LYNNETTE POOL (hereinafter "Respondent") hereby submits the  
2 following Response to the State Bar's Disciplinary Charges:  
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4 **INTRODUCTION**

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6 Respondent has not yet fully completed the investigation of facts relating to these  
7 cases and has not yet fully completed discovery in this action and has not completed  
8 preparation for trial. This Response to the State Bar's Disciplinary Charges is based  
9 solely upon information and documents which are presently available to, and specifically  
10 known by Respondent. It is anticipated that further discovery, independent investigation,  
11 legal research and analysis will supply additional facts, add meaning to the known facts,  
12 as well as establish entirely new factual conclusions and legal contentions, all of which  
13 may lead to substantial additions to, changes in and variations from this Response to the  
14 State Bar's Disciplinary Charges as herein set forth.  
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16  
17 The following Response to the State Bar's Disciplinary Charges is provided without  
18 prejudice to the Respondent's right to produce evidence of any subsequently discovered  
19 facts, documents or witnesses. If the Respondent obtains additional information or  
20 documents, learns the identity of additional witnesses, or determines that it intends to call  
21 additional witnesses to testify at the hearing of this matter, it will modify, amend, and/or  
22 supplement this Response to the State Bar's Disciplinary Charges.  
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25 **RESPONSE TO THE NOTICE OF DISCIPLINARY CHARGES**

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27 Subject to the matters set forth in the Introduction section above, Respondent  
28 Robin L. Pool provides the following in Response to the State Bar's Disciplinary Charges:

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Jurisdiction

1. In response to the allegations set forth in paragraph 1 of the Notice of Disciplinary Charges, Respondent admits the allegations contained therein.

Case No. 15-O-14777

2. In response to the allegations set forth in paragraph 2 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.
3. In response to the allegations set forth in paragraph 3 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.
4. In response to the allegations set forth in paragraph 4 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.

Case No. 15-O-14784

5. In response to the allegations set forth in paragraph 5 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.
6. In response to the allegations set forth in paragraph 6 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.

Case No. 15-O-15116

7. In response to the allegations set forth in paragraph 7 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.
8. In response to the allegations set forth in paragraph 8 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.

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9. In response to the allegations set forth in paragraph 9 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.

Case No. 15-O-15124

10. In response to the allegations set forth in paragraph 10 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.

11. In response to the allegations set forth in paragraph 11 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.

12. In response to the allegations set forth in paragraph 12 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.

Case No. 15-O-15306

13. In response to the allegations set forth in paragraph 13 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.

14. In response to the allegations set forth in paragraph 14 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.

15. In response to the allegations set forth in paragraph 15 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.

16. In response to the allegations set forth in paragraph 16 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.



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2 **PROOF OF SERVICE**

3 STATE OF CALIFORNIA )  
4 )  
5 COUNTY OF LOS ANGELES)

6 I am over the age of 18 and not a party to the within entitled action. My business address is 711  
7 N. Soledad Street, Santa Barbra, California 93103.

8 On May 31, 2016, I served a copy of the foregoing document described as:

9 **RESPONDENT ROBYN L. POOL'S RESPONSE TO THE**  
10 **STATE BAR'S NOTICE OF DISCIPLINARY CHARGES**

11 on the interested parties in this action as follows:

12 William Todd  
13 Deputy Trial Counsel  
14 State Bar of California  
15 845 S. Figueroa Street  
16 Los Angeles, CA 90017

Hon. W. Kearse McGill  
The State Bar Court  
845 S. Figueroa Street  
Third Floor  
Los Angeles, CA 90017

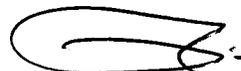
17  BY MAIL I caused such envelope(s) to be posted in the United States Mail at Los  
18 Angeles, California, with postage thereon fully prepaid. I am readily familiar with the  
19 firm's practice of collection and processing correspondence for mailing. It is deposited  
20 with the United States Postal Service each day, and that practice was followed in the  
21 ordinary course of business for the service herein attested to. [C.C.P. §1013(a)(3)].

22  BY PERSONAL SERVICE I caused such envelope(s) to be delivered by hand to  
23 the offices of counsel for the interested parties.

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

26  FEDERAL I declare that I am employed in the office of a member of the bar of  
27 this court at whose direction the service was made.

28 Executed this 26th day of July 2016, at Santa Barbara, California.



Kevin Gerry