

1 **THE LAW OFFICES OF KEVIN GERRY**
A Professional Corporation
2 Kevin Gerry (State Bar #129690)
433 N. Camden Drive, 4th Floor
3 Beverly Hills, California 90210
Telephone: (310) 275-1620
4 kevingerry@earthlink.net

5 Attorneys for Respondent Robyn L. Pool

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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**
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17 State Bar No. 218837
18 A Member of the State Bar of California.
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) Case Nos.: 15-O-15432, 15-O-15726
15-O-15738, 15-O-15754, 16-O-10040,
16-O-10076, 16-O-10094, 16-O-10095,
16-O-10149, 16-O-10157, 16-O-10374,
16-O-10538, 16-O-10656 and 16-O-11449

) **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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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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24 **RESPONSE TO THE NOTICE OF DISCIPLINARY CHARGES**

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26 Subject to the matters set forth in the Introduction section above, Respondent
27 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-15432

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.

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-15726

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.

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

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

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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-15738

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.

Case No. 15-O-15754

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.

17. In response to the allegations set forth in paragraph 17 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.

Case No. 16-O-10040

18. In response to the allegations set forth in paragraph 18 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.

19. In response to the allegations set forth in paragraph 19 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.

1 Case No. 16-O-10076

2 20. In response to the allegations set forth in paragraph 20 of the Notice of Disciplinary
3 Charges, Respondent denies the allegations contained therein.

4 21. In response to the allegations set forth in paragraph 21 of the Notice of Disciplinary
5 Charges, Respondent denies the allegations contained therein.

6 22. In response to the allegations set forth in paragraph 22 of the Notice of Disciplinary
7 Charges, Respondent denies the allegations contained therein.

8 Case No. 16-O-10094

9 23. In response to the allegations set forth in paragraph 23 of the Notice of Disciplinary
10 Charges, Respondent denies the allegations contained therein.

11 24. In response to the allegations set forth in paragraph 24 of the Notice of Disciplinary
12 Charges, Respondent denies the allegations contained therein.

13 Case No. 16-O-10095

14 25. In response to the allegations set forth in paragraph 25 of the Notice of Disciplinary
15 Charges, Respondent denies the allegations contained therein.

16 26. In response to the allegations set forth in paragraph 26 of the Notice of Disciplinary
17 Charges, Respondent denies the allegations contained therein.

18 27. In response to the allegations set forth in paragraph 27 of the Notice of Disciplinary
19 Charges, Respondent denies the allegations contained therein.

20 28. In response to the allegations set forth in paragraph 28 of the Notice of Disciplinary
21 Charges, Respondent denies the allegations contained therein.

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Case No. 16-O-10149

29. In response to the allegations set forth in paragraph 29 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.

30. In response to the allegations set forth in paragraph 30 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.

Case No. 16-O-10157

31. In response to the allegations set forth in paragraph 31 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.

32. In response to the allegations set forth in paragraph 32 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.

Case No. 16-O-10374

33. In response to the allegations set forth in paragraph 33 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.

34. In response to the allegations set forth in paragraph 34 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.

Case No. 16-O-10538

35. In response to the allegations set forth in paragraph 35 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.

36. In response to the allegations set forth in paragraph 36 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.

Case No. 16-O-10656

37. In response to the allegations set forth in paragraph 37 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.

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38. In response to the allegations set forth in paragraph 38 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.

39. In response to the allegations set forth in paragraph 39 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.

40. In response to the allegations set forth in paragraph 40 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.

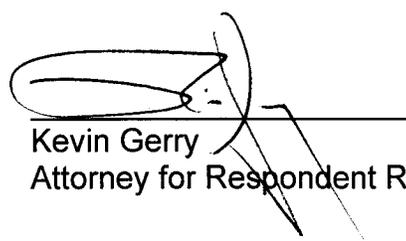
41. In response to the allegations set forth in paragraph 41 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.

42. In response to the allegations set forth in paragraph 42 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.

Case No. 16-O-10094

43. In response to the allegations set forth in paragraph 43 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.

Dated: August 17, 2016


Kevin Gerry
Attorney for Respondent Robyn L. Pool

