

1 Bryan Robinson, Esq. (SBN #188493)
2 Law Office Of Bryan Robinson
3 945 Taraval Street, # 403
4 San Francisco, CA 94116
5 P (415) 467-4050
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FILED

MAY 26 2017

STATE BAR COURT CLERK'S OFFICE
SAN FRANCISCO

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11 In Pro Per

12 THE STATE BAR COURT
13 HEARING DEPARTMENT-SAN FRANCISCO

14 In the Matter of
15 Bryan L. Robinson, No. 188493

Case No.: 15-O-15924 LMA

**ANSWER TO THE STATE BAR
COMPLAINT & NOTICE OF
DISCIPLINARY CHARGES**

16 A Member of the State Bar

Date:
Judge: Lucy Amendariz
180 Howard St., San Francisco, CA 94105
Dept: 6th Floor
Time:

17 TO THE HONORABLE LUCY AMENDARIZ, STATE BAR JUDGE, DEPUTY
18 TRIAL COUNSEL ERICA DENNINGS, AND ALL OTHER INTERESTED PARTIES:
19 Movant, Bryan Robinson, Esq., respectfully provides the following answer to the Notice of
20 Disciplinary Charges. Respondent generally denies all each and every element and statement of
21 the complaint. The response is timely pursuant to State Bar Rule 5.43 and CCP 1013
22
23 Count One— Violation of Rule 4-100 (A).
24 Count Two— Violation of Rule 4-100 (A).
25 Count Three-- Violation of Rule 4-100 (A).
26 Count Four-- Violation of Rule 4-100 (A).
27 Count Five-- Violation of Rule 4-100 (A).
28 Count Six-- Violation of Rule 4-100 (A)

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1 Count Seven— Violation of Rule 4-100 (A)

2
3 Count Eight--- Violation of Rule 6068 (D)

4 Count Nine-- Violation of Rule 6106

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6 Count Ten— Violation of Rule 6068 C

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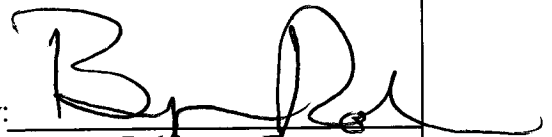
8 Respondent prays that the State Bar Court dismisses this complaint.

9

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11 Dated: 23rd day of January 2016

By:



Bryan Robinson, Esq.
In Pro Per

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10 In the Matter of:
11 Bryan L. Robinson, No. 188493

Case No.: 15-O-15924 LMA

**DECLARATION OF BRYAN ROBINSON IN
SUPPORT OF ANSWER TO NOTICE OF
DISCIPLINARY CHARGES**

15 A Member of the State Bar

Date:
Judge: Lucy Amendariz
180 Howard St., San Francisco, CA 94105
Dept: 6th Floor
Time:

16 Bryan Robinson makes the following statement to support his request for discovery:

- 17
- 18 1. I am the party petitioning this court and the State Bar Trial Counsel for the voluntary production of all
 - 19 documents used to prepare the Notice of Disciplinary Charges filed with this court May 3, 2017.
 - 20 2. This request for discovery is timely as the Notice of Disciplinary Charges was not received in my office
 - 21 until May 3, 2017.
 - 22 3. The answer denying all allegations satisfies the requirements for the request for the production of
 - 23 documents.
 - 24

25 I declare under the penalty of perjury that the foregoing statements are true and correct.

26 Dated: 26th day of Mayr 2017

27 By: _____
Bryan Robinson, Esq.
28 In Pro Per

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11 HEARING DEPARTMENT-SAN FRANCISCO

12 In the Matter of:
13 Bryan L. Robinson, No. 188493

Case No.: 15-O-15924 LMA

REQUEST FOR DISCOVERY

14 Date:
15 Judge: Lucy Amendariz
16 180 Howard St., San Francisco, CA 94105
17 Dept: 6th Floor
18 Time:

19 A Member of the State Bar

20 TO THE HONORABLE LUCY AMENDARIZ, STATE BAR JUDGE, DEPUTY
21 TRIAL COUNSEL CATHERINE TAYLOR, AND ALL OTHER INTERESTED PARTIES:
22 Movant, Bryan Robinson, Esq., respectfully submits this request for discovery under California Business and
23 Professions Code § 6085 (b) and State Bar Rule 5.65 et seq.

- 24 1. In light of the previously cited statute and state bar rules, I am respectfully requesting a copy of all
25 documents submitted by complainants, any evidence submitted by the complainants and any other
26 information submitted to the California State Bar that is the basis for the Notice of Disciplinary Charges.
- 27 2. The name address and telephone number of each individual likely to have discoverable information (along
28 with subjects of that information) that the disclosing party may use to support its allegations or defenses,
including in mitigation and aggravation;
3. The name (and if not previously provided, the address and telephone number) of each individual the
disclosing party intends to call as a witness and those it may call if the need arises, including in mitigation
and aggravation;

1 4. A copy (or description by category and location) of all documents, electronically stored information and
2 tangible things that the State Bar of California Trial Counsel has in its possession, custody or control and
3 may use to support his allegations for defense, including in mitigation or aggravation. This includes:

4 a. All statements about the subject of the proceedings, including any impeaching evidence, made by
5 any witnesses the State Bar of California Trial Counsel intends to call or may call if the need
6 arises;

7 b. All statements about the subject of the proceedings made by person named or described in the
8 notice or amendment thereto other than the member, when a claim that an act or omission of the
9 member as to the persons named or described is the basis for the discipline proceeding;

10 c. All investigative reports made by or on behalf of the State Bar of California Trial Counsel about
11 the subject of the proceeding;


12 d. All of the reports intended to be offered in evidence by State Bar of California Trial Counsel

13 5. for this discovery request "statements" shall be defined by State Bar Rule 5.65 (D)
14

15 After receiving this written request for discovery, the State Bar of California Trial Counsel has a continuing
16 duty to provide the items requested until the proceedings before the State Bar Court are concluded. The requested
17 Discovery must be provided throughout the process and as items become known to State Bar of California Trial
18 Counsel.

19 WHEREFORE, Bryan Robinson requests that the State Bar of California Trial Counsel voluntarily provide the
20 requested discovery or in the alternative an Order permitting him to receive the requested discovery.

21
22 Dated: 23rd day of November 2016

23 By: 
24 Bryan Robinson, Esq.
25 In Pro Per
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9 HEARING DEPARTMENT-SAN FRANCISCO

10 In the Matter of: Bryan L. Robinson, No.
11 188493

CASE NO.: 15-O-15924 LMA


12 PROOF OF SERVICE

- 13 1. ANSWER TO NOTICE OF DISCIPLINARY
14 CHARGES
15 2. DECLARATION IN SUPPORT OF ANSWER
16 TO NOTICE OF DISCIPLINARY CHARGES
17 3. REQUEST FOR DISCOVERY
18 4. DECLARATION IN SUPPORT OF
19 REQUEST FOR DISCOVERY

20 A Member of the State Bar

21 I, Shirley Moore, hereby declare that I am over the age of eighteen (18) years, and not a party to the within action.

22 On May 26, 2017, I served the following documents: (a) Answer to Notice of Disciplinary Charges (b) Declaration
23 in Support of Answer to Notice of Disciplinary Charges (c) Request for Discovery (d) Declaration in Support of
24 Request for Discovery, (e) PROOF OF SERVICE, on the State Bar Office of the Trial Counsel, Attn: Erica
25 Dennings, 180 Howard Street, San Francisco, CA 94105, by placing true and correct copies thereof in a sealed
26 envelope with postage thereon fully prepaid, in the United States mail, at San Francisco, California. A courtesy
27 chambers copy was sent to Judge Amendariz at 180 Howard Street, San Francisco, CA 94105. I declare under
28 penalty of perjury that the foregoing is true and correct. Executed on May 26, 2017, at San Francisco, California.


Shirley Moore