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FILED

OCT 11 2016

STATE BAR COURT
CLERK'S OFFICE
LOS ANGELES

STATE BAR COURT

HEARING DEPARTMENT – LOS ANGELES

In the Matter of **ROBYN LYNNETTE POOL** State Bar No. 218837 A Member of the State Bar of California.	Case Nos. 16-O-10146, 16-O-10543 16-O-11766, 16-O-11769, 16-O-12249, 16-O-13097, 16-O-13149, 16-O-13585, 16-O-10149, 16-O-10157, 16-O-10374, 16-O-13636, 16-O-13731 and 16-O-14256 RESPONDENT ROBYN L. POOL'S RESPONSE TO THE STATE BAR'S NOTICE OF DISCIPLINARY CHARGES Assigned to Judge W. Kearse McGill

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

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ROBYN LYNNETTE POOL (hereinafter "Respondent") hereby submits the following Response to the State Bar's Disciplinary Charges:

INTRODUCTION

Respondent has not yet fully completed the investigation of facts relating to these cases and has not yet fully completed discovery in this action and has not completed preparation for trial. This Response to the State Bar's Disciplinary Charges is based solely upon information and documents which are presently available to, and specifically known by Respondent. It is anticipated that further discovery, independent investigation, legal research and analysis will supply additional facts, add meaning to the known facts, as well as establish entirely new factual conclusions and legal contentions, all of which may lead to substantial additions to, changes in and variations from this Response to the State Bar's Disciplinary Charges as herein set forth.

The following Response to the State Bar's Disciplinary Charges is provided without prejudice to the Respondent's right to produce evidence of any subsequently discovered facts, documents or witnesses. If the Respondent obtains additional information or documents, learns the identity of additional witnesses, or determines that it intends to call additional witnesses to testify at the hearing of this matter, it will modify, amend, and/or supplement this Response to the State Bar's Disciplinary Charges.

RESPONSE TO THE NOTICE OF DISCIPLIANRY CHARGES

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

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. 16-O-10146

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.
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.

Case No. 16-O-10543

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.

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. 16-O-11766

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

Case No. 16-O-11769

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

Case No. 16-O-12249

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

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.

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

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

Case No. 16-O-13097

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

Case No. 16-O-13149

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

Case No. 16-O-13585

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

Case No. 16-O-13636

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

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

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

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

Case No. 16-O-13731

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-14526

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

Dated: October 11, 2016

Kevin Gerry
Attorney for Respondent Robyn L. Pool

PROOF OF SERVICE

STATE OF CALIFORNIA)
)
COUNTY OF LOS ANGELES)

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

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

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

on the interested parties in this action as follows:

William Todd
Deputy Trial Counsel
State Bar of California
845 S. Figueroa Street
Los Angeles, CA 90017

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

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

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

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

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

Executed this 11th day of October 2016, at Santa Barbara, California.

Kevin Gerry