

1 **GRENVILLE PRIDHAM** (SBN: 120695)
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3 Orange, CA 92687
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FILED

JAN 17 2019

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

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In pro per

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

In the matter of,

GRENVILLE THOMAS PRIDHAM,
No. 120695,

A Member of the State Bar

No.: 17-O-04373; 17-O-04374; 17-O-04375; 17-O-04376; 17-O-04377; 17-O-04378; and 17-O-17838

**RESPONSE TO NOTICE OF
DISCIPLINARY CHARGES;
REQUEST FOR ALTERNATIVE
DISCIPLINARY PROGRAM**

RESPONSE

1. Respondent admits the allegations included in paragraph 1 of the Notice of Disciplinary Charges (“NDC”).

2. Respondent denies the allegations in paragraph 2 of the NDC that he “intentionally, recklessly, or repeatedly failed to perform with competence.”

3. Respondent denies the allegations in paragraph 3 of the NDC. Respondent denies that any of the allegations of misconduct in the aforementioned paragraph were willful, reckless or done intentionally and that, at the time the things alleged in the paragraph took place, respondent was suffering from a mental disability that significantly impacted a major life activity, his work.

1 4. Respondent denies the allegations in paragraph 4 of the NDC. Respondent
2 denies that any of the allegations of misconduct in the aforementioned paragraph were
3 willful, reckless or done intentionally and that, at the time the things alleged in the
4 paragraph took place, respondent was suffering from a mental disability that significantly
5 impacted a major life activity, his work.

6 5. Respondent denies the allegations in paragraph 5 of the NDC. Respondent
7 denies that any of the allegations of misconduct in the aforementioned paragraph were
8 willful, reckless or done intentionally and that, at the time the things alleged in the
9 paragraph took place, respondent was suffering from a mental disability that significantly
10 impacted a major life activity, his work.

11 6. Respondent denies the allegations in paragraph 6 of the NDC. Respondent
12 denies that any of the allegations of misconduct in the aforementioned paragraph were
13 willful, reckless or done intentionally and that, at the time the things alleged in the
14 paragraph took place, respondent was suffering from a mental disability that significantly
15 impacted a major life activity, his work.

16 7. Respondent denies the allegations in paragraph 7 of the NDC. Respondent
17 denies that any of the allegations of misconduct in the aforementioned paragraph were
18 willful, reckless or done intentionally and that, at the time the things alleged in the
19 paragraph took place, respondent was suffering from a mental disability that significantly
20 impacted a major life activity, his work.

21 8. Respondent denies the allegations in paragraph 8 of the NDC. Respondent
22 denies that any of the allegations of misconduct in the aforementioned paragraph were
23 willful, reckless or done intentionally and that, at the time the things alleged in the
24 paragraph took place, respondent was suffering from a mental disability that significantly
25 impacted a major life activity, his work. Respondent further denies that the alleged
26 actions constitute moral turpitude. Respondent further asserts that the moral turpitude
27 allegations made against him constitute a violation of Title II of the Americans with
28 Disabilities act and the California Disabled Persons Act.

1 9. Respondent denies the allegations in paragraph 8 of the NDC. Respondent
2 denies that any of the allegations of misconduct in the aforementioned paragraph were
3 willful, reckless or done intentionally and that, at the time the things alleged in the
4 paragraph took place, respondent was suffering from a mental disability that significantly
5 impacted a major life activity, his work. Respondent further denies that the alleged
6 actions constitute gross negligence or in any way form a basis for moral turpitude.
7 Respondent further asserts that the moral turpitude allegations made against him
8 constitute a violation of Title II of the Americans with Disabilities act and the California
9 Disabled Persons Act.

10 10. Respondent denies the allegations in paragraph 10 of the NDC. Respondent
11 denies that any of the allegations of misconduct in the aforementioned paragraph were
12 willful, reckless or done intentionally and that, at the time the things alleged in the
13 paragraph took place, respondent was suffering from a mental disability that significantly
14 impacted a major life activity, his work.

15 11. Respondent denies the allegations in paragraph 11 of the NDC. Respondent
16 denies that any of the allegations of misconduct in the aforementioned paragraph were
17 willful, reckless or done intentionally and that, at the time the things alleged in the
18 paragraph took place, respondent was suffering from a mental disability that significantly
19 impacted a major life activity, his work.

20 12. Respondent denies the allegations in paragraph 12 of the NDC. Respondent
21 denies that any of the allegations of misconduct in the aforementioned paragraph were
22 willful, reckless or done intentionally and that, at the time the things alleged in the
23 paragraph took place, respondent was suffering from a mental disability that significantly
24 impacted a major life activity, his work.

25 13. Respondent denies the allegations in paragraph 13 of the NDC. Respondent
26 denies that any of the allegations of misconduct in the aforementioned paragraph were
27 willful, reckless or done intentionally and that, at the time the things alleged in the
28

1 paragraph took place, respondent was suffering from a mental disability that significantly
2 impacted a major life activity, his work.

3 14. Respondent denies the allegations in paragraph 14 of the NDC. Respondent
4 denies that any of the allegations of misconduct in the aforementioned paragraph were
5 willful, reckless or done intentionally and that, at the time the things alleged in the
6 paragraph took place, respondent was suffering from a mental disability that significantly
7 impacted a major life activity, his work.

8 15. Respondent denies the allegations in paragraph 15 of the NDC. Respondent
9 denies that any of the allegations of misconduct in the aforementioned paragraph were
10 willful, reckless or done intentionally and that, at the time the things alleged in the
11 paragraph took place, respondent was suffering from a mental disability that significantly
12 impacted a major life activity, his work.

13 16. Respondent denies the allegations in paragraph 16 of the NDC. Respondent
14 denies that any of the allegations of misconduct in the aforementioned paragraph were
15 willful, reckless or done intentionally and that, at the time the things alleged in the
16 paragraph took place, respondent was suffering from a mental disability that significantly
17 impacted a major life activity, his work.

18 17. Respondent denies the allegations in paragraph 17 of the NDC. Respondent
19 denies that any of the allegations of misconduct in the aforementioned paragraph were
20 willful, reckless or done intentionally and that, at the time the things alleged in the
21 paragraph took place, respondent was suffering from a mental disability that significantly
22 impacted a major life activity, his work.

23 18. Respondent denies the allegations in paragraph 18 of the NDC. Respondent
24 denies that any of the allegations of misconduct in the aforementioned paragraph were
25 willful, reckless or done intentionally and that, at the time the things alleged in the
26 paragraph took place, respondent was suffering from a mental disability that significantly
27 impacted a major life activity, his work.

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1 19. Respondent denies the allegations in paragraph 19 of the NDC. Respondent
2 denies that any of the allegations of misconduct in the aforementioned paragraph were
3 willful, reckless or done intentionally and that, at the time the things alleged in the
4 paragraph took place, respondent was suffering from a mental disability that significantly
5 impacted a major life activity, his work.

6 20. Respondent denies the allegations in paragraph 20 of the NDC. Respondent
7 denies that any of the allegations of misconduct in the aforementioned paragraph were
8 willful, reckless or done intentionally and that, at the time the things alleged in the
9 paragraph took place, respondent was suffering from a mental disability that significantly
10 impacted a major life activity, his work.

11 21. Respondent denies the allegations in paragraph 21 of the NDC. Respondent
12 denies that any of the allegations of misconduct in the aforementioned paragraph were
13 willful, reckless or done intentionally and that, at the time the things alleged in the
14 paragraph took place, respondent was suffering from a mental disability that significantly
15 impacted a major life activity, his work.

16 22. Respondent denies the allegations in paragraph 22 of the NDC. Respondent
17 denies that any of the allegations of misconduct in the aforementioned paragraph were
18 willful, reckless or done intentionally and that, at the time the things alleged in the
19 paragraph took place, respondent was suffering from a mental disability that significantly
20 impacted a major life activity, his work.

21 23. Respondent denies the allegations in paragraph 23 of the NDC. Respondent
22 denies that any of the allegations of misconduct in the aforementioned paragraph were
23 willful, reckless or done intentionally and that, at the time the things alleged in the
24 paragraph took place, respondent was suffering from a mental disability that significantly
25 impacted a major life activity, his work.

26 24. Respondent denies the allegations in paragraph 24 of the NDC. Respondent
27 denies that any of the allegations of misconduct in the aforementioned paragraph were
28 willful, reckless or done intentionally and that, at the time the things alleged in the

1 paragraph took place, respondent was suffering from a mental disability that significantly
2 impacted a major life activity, his work.

3 25. Respondent denies the allegations in paragraph 25 of the NDC. Respondent
4 denies that any of the allegations of misconduct in the aforementioned paragraph were
5 willful, reckless or done intentionally and that, at the time the things alleged in the
6 paragraph took place, respondent was suffering from a mental disability that significantly
7 impacted a major life activity, his work.

8 26. Respondent denies the allegations in paragraph 26 of the NDC. Respondent
9 denies that any of the allegations of misconduct in the aforementioned paragraph were
10 willful, reckless or done intentionally and that, at the time the things alleged in the
11 paragraph took place, respondent was suffering from a mental disability that significantly
12 impacted a major life activity, his work.

13 27. Respondent denies the allegations in paragraph 27 of the NDC. Respondent
14 denies that any of the allegations of misconduct in the aforementioned paragraph were
15 willful, reckless or done intentionally and that, at the time the things alleged in the
16 paragraph took place, respondent was suffering from a mental disability that significantly
17 impacted a major life activity, his work.

18 28. Respondent denies the allegations in paragraph 28 of the NDC. Respondent
19 denies that any of the allegations of misconduct in the aforementioned paragraph were
20 willful, reckless or done intentionally and that, at the time the things alleged in the
21 paragraph took place, respondent was suffering from a mental disability that significantly
22 impacted a major life activity, his work.

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1 **PROOF OF SERVICE BY MAIL**


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3 I, LISA CARGILE, am a resident of the County of ORANGE COUNTY, State of
4 California. My business address is 22996 EL TORO RD, STE 110, LAKE FOREST, CA
5 92630. On JAN 14, 2019, I served the **RESPONSE TO DISCIPLINARY CHARGES**
6 **AND REQUEST FOR A.D.P.** on the interested parties shown below in the case *IN RE:*
7 ***GRENVILLE PRIDHAM, A MEMBER OF THE STATE BAR*** by placing a true and
8 correct copy of the aforementioned document(s) in an addressed and postage-paid
9 envelope addressed to:

10
11 **MS. CAITLIN M. ELEN**
12 **DEPUTY TRIAL COUNSEL**
13 **STATE BAR OF CALIFORNIA**
14 **845 S. FIGUEROA STREET**
15 **LOS ANGELES, CA 90017-2515**

16 I thereafter deposited the envelope in the U.S. Mail in LAKE FOREST, CA.

17 I declare under penalty of perjury under the laws of the State of California that the
18 aforementioned declaration/proof of service is true and correct.

19 EXECUTED this 14TH day of JAN, 2019 at Lake Forest, California.

20
21 
22 **LISA CARGILE**