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6 Respondent Pro Se
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9 STATE BAR COURT
10 HEARING DEPARTMENT – SAN FRANCISCO
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14 In the matter of:
15 CHARLES DODGSON,
16 No. 999999,
17 A Member of the State Bar.

Case No. 13-O-1778506

REQUEST FOR DISCOVERY AND
PRODUCTION OF DOCUMENTS

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1 TO THE STATE BAR OF CALIFORNIA:

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3 Respondent Charles Dodgson, in accordance with Rules of Procedure of
4 the State Bar of California 5.65 hereby requests as follows:

5 **DEFINITIONS**

- 6 1. "State Bar" means the State Bar of California and its predecessors,
7 successors in interest, agents, administrators, employees,
8 representatives, counsel, transferees, and assigns, and all
9 individuals acting on or appearing to act on its behalf and/or in its
10 name.
- 11 2. "Statement" is defined in Rules of Procedure of the State Bar of
12 California 5.65(D) and means a written statement that the person has
13 signed or otherwise adopted or approved; or a contemporaneous
14 stenographic, mechanical, electrical, or other recording, or a
15 transcription of such recording, that recites substantially verbatim
16 the person's oral statement.
- 17 3. "This proceeding" means the above-captioned State Bar Court
18 matter.

19 **DISCOVERY AND DOCUMENT REQUESTS**

- 20 1. Please provide the name, address and telephone number of each
21 individual likely to have discoverable information, along with the subjects of
22 that information, that the State Bar may use to support its allegations and claims
23 of aggravating factors against Respondent in this proceeding.
- 24 2. Please identify by name, address and telephone number each
25 individual the State Bar intends to call as a witness against Respondent in
26 support of the State Bar's allegations and claims of aggravating factors in this
27 proceeding.
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1 3. Please provide a copy of all documents, electronically stored
2 information and tangible things within the State Bar's possession, custody or
3 control that the State Bar may use to support its allegations and claims of
4 aggravating factors against Respondent. This request includes:

- 5 (a) all statements about the subject matter of this proceeding,
6 including any impeaching evidence, made by any witness the
7 State Bar intends to call or may call should the need arise;
8 (b) all statements about the subject matter of this proceeding
9 made by a person named or described in the notice of
10 disciplinary charges other than the member when it is claimed
11 that an act or omission of the member as to the person named
12 or described in the notice is a basis for the disciplinary
13 proceeding;
14 (c) all investigative reports made by or on behalf of the State Bar
15 about the subject matter of this proceeding;
16 (d) all reports of mental, physical, and blood examinations
17 intended to be offered in evidence by the State Bar.

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19 Dated: October 26, 2015

20 Charles Dodgson
21 Respondent