

1 CHARLES DODGSON (SBN 999999)  
123 Main Street  
2 Walnut Creek, CA 94507  
3 Ph: (510) 555-1212  
4 Fx: (415) 555-1212  
5 *charles@dodgsonlaw.com*

6 Respondent Pro Se  
7  
8

9 STATE BAR COURT  
10 HEARING DEPARTMENT – SAN FRANCISCO  
11

12  
13 In the matter of:  
14 CHARLES DODGSON,  
15 No. 999999,  
16 A Member of the State Bar.  
17

Case No. 13-O-1778506

RESPONDENT'S RESPONSE TO STATE  
BAR'S REQUEST FOR DISCOVERY

18  
19  
20 Respondent Charles Dodgson ("Mr. Dodgson") hereby submits the  
21 following Response to the State Bar's Request for Discovery. This response is  
22 timely served, the State Bar's Request having been served by U.S. Mail on  
23 October 25, 2015, the response being due for service within 20 days thereof, and  
24 the time for service of the response being extended by 5 days due to service  
25 being made by mail upon an address within the State of California, per Rule of  
26 Procedure of the State Bar of California 5.28 and Cal Code. Civ. P. § 1013(a).  
27  
28



1 response to Request No. 2.

2 **REQUEST No. 3**

3 **A copy – or description by category and location – of all documents,**  
4 **electronically stored information and tangible things that the disclosing party**  
5 **has in its possession, custody or control and may use to support its allegations**  
6 **or defenses, including in mitigation or aggravation. This includes:**

- 7 (a) **all statements about the subject matter of the proceedings,**  
8 **including any impeaching evidence, made by any witness**  
9 **then intended too be called or may be called if the need**  
10 **arises by the disclosing party;**  
11 (b) **all statements about the subject matter of the proceedings**  
12 **made by a person named or described in the notice, or**  
13 **amendment to the notice, other than the member when it is**  
14 **claimed that an act or omission of the member as to the**  
15 **person named or described is a basis for the discipline**  
16 **proceeding;**  
17 (c) **all investigative reports made by or on behalf of the**  
18 **disclosing party about the subject matter of this proceeding;**  
19 (d) **all reports of mental, physical, and blood**  
20 **examinations then intended to be offered in evidence**  
21 **by the disclosing party.**

22 Respondent provides herewith documents responsive to this request to the  
23 extent they are not duplicates of documents provided by the State Bar in  
24 response to Respondent's own discovery request. The bulk of the documents  
25 Respondent has in her possession were previously provided to the State Bar in  
26 the course of the investigation of this matter, and those documents have now  
27 been produced back to Respondent by the State Bar. For the sake of efficiency  
28 and economy, Respondent does not duplicate those documents again here.

The documents produced in response to this request are bates numbered  
CD 01031-01125.

As to all matters disclosed herein, Respondent has made a good faith effort  
in accordance with Rules of Procedure of the State Bar of California 5.65(F) to  
respond as completely as possible. Respondent reserves the right to supplement

1 his response through the close of discovery in this matter.

2 Respondent has not withheld documents on the basis of privilege and as  
3 such has not provided a privilege log pursuant to Rule 5.65. Respondent's client  
4 Jonathan Yates waived privilege applicable to Respondent's provided  
5 documents.

6  
7  
8 Dated: December 1, 2015

\_\_\_\_\_

9 Charles Dodgson  
10 Respondent

11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28