FILED

Aliyah S. Abdullah 2715 West Kettleman Lane #203-144 Lodi, California 95242

JAN 3 0 2017

STATE BAR COURT CLERK'S OFFICE SAN FRANCISCO

STATE BAR COURT HEARING DEPARTMENT - SAN FRANCISCO

In the Matter of:

CASE NO.: 15-O-12925/16066

ALIYAH S. ABDULLAH

A Member of the State Bar

RESPONSE

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Aliyah Abdullah ("Member") hereby responds to the allegations filed in the charging document:

GENERAL DENIAL

Member denies generally and specifically each and every count contained in the charging document. In addition, Member denies that complainants have sustained, or will sustain, any loss or damage, by reason of any act or omission, or any other conduct or absence thereof on the part of Member.

SPECIFIC DENIALS

COUNT ONE

Member denies Count One. 1.

COUNT TWO

2. Member denies Count Two. kwiktag*

-1-

RESPONSE

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1	COUNT THREE	
2	3.	Member denies Count Three.
3	COUNT FOUR	
4	4.	Member denies Count Four.
5	COU	NT FIVE
6	5.	Member denies Count Five.
7	COUNT SIX	
8	6.	Member denies Count Six.
9	COUNT SEVEN	
10	7.	Member denies Count Seven.
11	COUNT EIGHT	
12	8.	Member denies Count Eight.
13	<u>COUNT NINE</u>	
14	9.	Member denies Count Nine.
15	<u>COUNT TEN</u>	
16	10.	Member denies Count Ten.
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18		AFFIRMATIVE DEFENSES
19	AFF	IRMATIVE DEFENSE ONE
20	1.	As a separate and distinct affirmative defense, Member alleges that complainants
21	have not suffered any losses, and Member has not been unjustly enriched as a result of	
22	any action or inaction by Member.	
23	A PRIDA (A TIME DEPENDE TIMO	
24	AFF	IRMATIVE DEFENSE TWO
25	2.	As a separate and distinct affirmative defense, Member alleges that complainants
26	were treated fairly and in good faith by Member, and that all actions taken with regard to	
27	ther	n were taken for business reasons in good faith.
28		-2-

RESPONSE

AFFIRMATIVE DEFENSE THREE

3. As a separate and distinct affirmative defense, Member states she does not presently know all facts concerning complainants sufficient to state all affirmative defenses at this time. Member seeks leave of this Court to amend this Response should Member later discover facts demonstrating the existence of additional affirmative defenses.

PRAYER FOR RELIEF

WHEREFORE, Member prays for judgment from this Court as follows:

- 1. That the charging document is dismissed with prejudice, and the notice of filing disciplinary charges be removed from Member's membership record.
- 2. Such other and further relief as the Court deems appropriate and proper.

Dated: January 30, 2017

Respectfully Submitted,

Myah S. Abdullah

DECLARATION OF SERVICE

I, the undersigned, am over the age of eighteen (18) years, whose address is 2715 W. Kettleman Lane #203-144, Lodi, California 95242, declare that on the date shown below, I caused to be served a true copy of the document listed below as follows:

Response

Case No.: 15-O-12925/16066

X U.S. Mail First-Class Mail: I deposited or placed document(s) for collection and mailing in the City of Stockton, County of San Joaquin, addressed to the person(s) listed below.

Fax Transmission: I faxed the document(s) to the person(s) listed below at the fax number(s) listed below. No error was reported by the fax machine used. The fax transmission record has been retained and is available upon request.

Electronic Service: I caused the document(s) to be sent to the person(s) listed below at the electronic mail address(es) listed below.

Person Served:

Kevin Taylor
Office of the Chief Trial Counsel
180 Howard Street
San Francisco, California 94105-1639

Fax Number: (415) 538-2220

E-Mail Address: Kevin.Taylor@calbar.ca.gov

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed at Stockton, California on the date shown below.

Dated: January 30, 2017

Signed,

Aliyah Abdulluh Aliyah Abdullah

Declarant