

R11



THE STATE BAR
OF CALIFORNIA

OFFICE OF CHIEF TRIAL COUNSEL
INTAKE UNIT

845 SOUTH FIGUEROA STREET, LOS ANGELES, CALIFORNIA 90017-2515

TELEPHONE: (213) 765-1000

FAX: (213) 765-1168

<http://www.calbar.ca.gov>

December 8, 2017

Robert J. Kulick
38122 Village 38
Camarillo, CA 93012

RE: Inquiry Number: 17-16823
Respondent: Steven Rein

Dear Mr. Kulick:

This will acknowledge receipt on November 18, 2017 of your fax dated November 18, 2017, receipt on November 26, 2017 of your fax dated November 25, 2017, and receipt on December 3, 2017 of your fax dated December 3, 2017 regarding the above inquiry.

Your recent correspondence presents no new evidence which would merit reopening your complaint. However, we do note that Hon. Judge DeNoce granted Mr. Rein's request to be relieved as counsel in your case on November 16, 2017. Regarding your complaint that Mr. Rein did not report sanctions imposed on him by the court, please be advised that pursuant to Business & Professions Code §6068(o), attorneys are not required to report sanctions related to discovery, nor are they required to report sanctions under \$1,000.00. We note that on July 27, 2017, Mr. Rein was sanctioned related to deficiencies in responding to and complying with discovery.

Based on our prior review, the decision to close this file will stand.

Thank you for bringing this matter to our attention.

Very truly yours,

A handwritten signature in cursive script that reads "Bailey K.F. Means".

Bailey K.F. Means
Deputy Trial Counsel

EXHIBIT A, page 1 of 3

28.26.17

SUPERIOR COURT OF CALIFORNIA,
COUNTY OF VENTURA
VENTURA

MINUTE ORDER

DATE: 07/27/2017

TIME: 08:20:00 AM

DEPT: 43

JUDICIAL OFFICER PRESIDING: Kevin DeNoce

CLERK: Tiffany Froedge

REPORTER/ERM: Laura Frost

CASE NO: 56-2016-00478277-CU-DF-VTA

CASE TITLE: Kulick VS Leisure Village

CASE CATEGORY: Civil - Unlimited CASE TYPE: Defamation

EVENT TYPE: Motion to Compel Further Written Discovery Responses and for Monetary Sanctions against Plaintiff and his Counsel in the amount of 7900.00

MOVING PARTY: Patrick Price, Robert Riveles, Donald Marquardt, Leisure Village Association Inc, Rita Linsey, Linda Grant, Theodore Lansing, Charles Kiskaden, Gerald Rosen, Robert Schaeffer, John Mayer

CAUSAL DOCUMENT/DATE FILED: Motion to Compel Further Written Discovery Responses and for Monetary Sanctions against Plaintiff and his Counsel in the amount of 7900.00, Declaration of Celina C Kirchner in Support, 07/05/2017

APPEARANCES

Steven Rein, counsel, present for Plaintiff, Appellant(s).

Celina Kirchner, specially appearing for counsel EDWARD D. VAISBORT, present for Defendant, Respondent on Appeal(s).

At 09:16 a.m., court convenes in this matter with all parties present as previously indicated.

Counsel have received and read the court's written tentative ruling.

Matter submitted to the Court with argument.

The Court finds/orders:

Counsel are to meet and confer within 24 hours and if there is anything outstanding that is to be provided within 48 hours.

Matter is taken under submission.

After further consideration of the submitted matter, the court rules as follows:

The court grants Defendants' request for an order compelling Plaintiff Robert Kulick to provide further responses to special interrogatories (set no. 1) nos. 1-113, 120-178, 216-245, 249-278, and 282-384 (i.e., those which are addressed in Defendants' Moving Separate Statement). Plaintiff is ordered to serve Defendants' counsel by no later than August 10, 2017, with further responses to each of these special interrogatories which (a) contain a separate response to each separate interrogatory (see Code of Civil Procedure §2030.210(a)); and (b) which respond specifically to each interrogatory as stated (e.g., where an interrogatory only asks for information regarding a single defendant, the response only contains information regarding that defendant).

DATE: 07/27/2017

MINUTE ORDER

Page 1

DEPT: 43

VEN-FNR-10.03

EXHIBIT A, page 2 of 3

The court denies Defendants' request for an order compelling Plaintiff's further responses to requests for admissions (set no. 1) nos. 3 and 4, on the ground that these requests for admissions are overly compound on their face, and Plaintiff's responses thereto are reasonable under the circumstances.

The court orders Plaintiff and Defendants to "meet and confer" regarding Plaintiff's supplemental responses to form interrogatories (set no. 1) and requests for production. The Court respectfully declines to rule on the sufficiency of these supplemental responses prior to the parties completing their "meet and confer" and based on the limited record before the court. If after the parties "meet and confer" regarding Plaintiff's supplemental responses and there is still a dispute, Defendants may bring a new motion to compel further responses addressing these supplemental responses.

The court finds that when Defendants' motion was filed, it was substantially well-taken; and that Plaintiff failed to participate in the "meet and confer" process in good faith by failing to timely respond to Defendants' "meet and confer" attempts, and by making a late and equivocal request for additional time to provide supplemental responses of an unspecified nature (e.g., "to at least some of the items"). Based on this finding, the court awards Defendants \$4,000 in attorney's fees reasonably incurred in bringing this motion pursuant to Code of Civil Procedure §§2030.300(d), 2031.310(h), and 2033.290(d), payable jointly by Plaintiff Kulick and his counsel Steven Rein by no later than September 22, 2017.

Notice to be given by the clerk via email and U.S. mail.

10-26-17, Via State Bar, CA, fax #. for forward to following parties
faxed to below/fax time not reset/Most Urgent Attn:

Fax to: Intake, State Bar, CA, Inquiry #17-168823, in Re: Steven Rein, Esq.
Luis Rodriques, President or Current & BOD, State Bar, CA
Tani Cantil-Sakauye, Oversight Administrator of State Bar, CA: A
duty as Chief Justice of CA Supreme Court

Fax to: Xavier Becerra, A.G., CA DOJ, Public Inquiry Unit: #21200 in Re:
Steven Rein, Esq. *Unit Inquiry Mr*

Casey Hallinan, Public Inquiry Unit, CA DOJ

From: (Mr.) R.J. (Robert) Kulick, 38122 Village 38, Camarillo, CA 93012,
310/474-1848 *Unit Inquiry Mr*

In Re: Intake, State Bar, CA, Inquiry #17-168823 in Re: Steven Rein, Esq.

1. The following copies of documents for insertion in this above Inquiry
#17-16823:

- a. Enclosed copies of; 10-24-17 fax to: Kevin G. DeNoce, Hon. in Re:
VCSC, Case #478277, Rein Motion To Be Relieved As Counsel, hearing:
10-27-17, 8:30AM, Dept. 43: (10) pages, & 10/24 Rein reply to
Kulick fax to Rein in Re: "question" to Rein, & 11-9-15 in Re:
Terms of Engagement between Rein & Kulick (Attorney/Client retainer
agreement) three pages, & 12-30-15 fax to State Bar, CA-Intake
which State Bar, CA-Intake refused to respond to in Re: Steven Rein
Esq, (11) pages, & 1-1-16 fax to Rein in part in Re: his
"blackmailing me into this Exparte on 1-7-16...situation" in Re:
VCSC Case #2013-444977, & 1-4-16 fax to Rein about a copy of
contact, we signed on 12-9-15 which subsequently Rein stopped
Exparte on 1-7-16 to be relieved as my counsel & note: because of
Rein's "blackmail" against me, (I) taped recorded a phone
conversation between us on 1-4-16 about 12:08PM which in part
Rein stated that he had client complaints against him with State
Bar, CA but he claims "none of them succeeded, no record" against
him & upon Intake request will play this taped recorded phone
with Rein & 2016 Kulick phone log of 1/4, 12:08PM phone with Rein &
Verizon Usage Detail of 1/4, 12:08PM phone with Rein at his office
#805/306-0300 & with Verizon statement date 1-16-16.
- b. There are other copies of documents to follow to be inserted in
this above Inquiry # too, but at this time, unable to forward
due to my numerous ill-ailments & side-effects from medications
for these ill-ailment & tremendous lack of energy & chronic fatigue
which I'm suffering on a daily basis & my Dyslexia making reading
& writing most difficult.

I, Robert Kulick, declare under penalty of perjury that all the above is
true & correct to the best of my knowledge & belief:

Signed:

Dated: 10-26-17


Robert Kulick

2. Please do not close this Inquiry # above until I write you that I
have submitted everything about this complaint against Steven Rein, Esq.
There's much more pending.
Await your written confirm just that you confirm receipt of this fax &
please not closing this complaint yet per above.


(Cont'd)

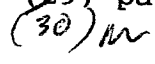
EXHIBIT B, page 1 of 4

Intake, State Bar, CA, et al,
Xavier Becerra, et al, CA DOJ

Robert Kulick

Page 2
10-26-17

(Cont'd): Sincerely, R.J. (Robert) Kulick, 

c: The State Bar, CA, assumed subject for copy of this fax to Steven
Rein, Esq.: ~~(29)~~ (30) pages follow in this transmission
***** 

In Re: Becerra: Dear Mr. Becerra: In Re: 9/28 & 10/16 ^{of 2017, /} faxes/to you in
Re: PUI: 21200 In Re: Steven Rein:

Per the above to State Bar, CA, Inquiry #17-168823, Intake, please
insert this 10-26-17 fax in your PUI: 21200 file, & please confirm
in writing receipt of this fax & status of prior 10-16-17 to you/
Casey Hallinan.

Sincerely, R.J. (Robert) Kulick 

c: same parties "c:" in 10-16-17 fax to Becerra/Hallinan

EXHIBIT B, page 2 of 4

2016

recorded because believe his ~~agony~~ ⁱⁿ ~~trial~~ ^{on} ~~screen~~ ^{at}
Vreque for trial
retain agreement then Rein ~~actually~~
all withdraw Motion to be
~~settled~~ relieved.

you accepted the money on
the 8th, now serious
problem, discussed the
separate case

Rein claims he did not
sign a contract + I
said you did. + Rein
said send it to me + if
he did then he says
he apologized

Rein concerned about complam
w/ state Bar.

1/4, 1208pm (Rein) Virginia to
Rein = got all faxes +
+ Cant do Freedom of Press +
Speech + discussed most of
current situation for some kind
of amicable resolution
+ call him back

② 11:00pm ^{Rein} Step #1 you are not
going to do separate
case for Freedom + Speech
until after trial
however this is to be
discussed if that's
possible to proceed
on that case.
Cross out above
+ step #1 is to proceed
w/ present case
Step #2 (filing notice of
appeal is one thing) but
doing actual appeal
is another thing; for
that into FOK, for denial
of Anti SLAPP to supersede
+ fax ^{him} 12/9 contract
w/ his signature; what to
and 1750

PERSONAL PARENT CARE, INC.
ELDERCARE MANAGEMENT • HOME CAREGIVERS • FACILITY PLACEMENT

(cont'd) Rein admits that ②
his had complaints against
him by his clients, none
of them ever succeed, he claims
no record,

he says ^{he says} ~~now~~ ^{in 100's} taken for trial,
his last ~~because~~ ^{because} he can't recall
how many, he admits his
gotten some Bar complaints
called ~~inquiries~~ ^{inquiries},
(~~except~~ ^{Rein} ~~his~~ ^{social path} ~~relieved~~)
Rein tells he's anything but a social path
given his background, fax to him was
how I felt, don't regret I wrote fax
+ made me sad.

1/4, 149m { FAX 805/306-0180
151m } Rein

Usage Detail

Zone Unit Charges

Date	Time	Place	Number	Rate	Minutes	Amount
Dec 16	4:23 AM	SimiValley CA	805-306-0180	Night	1.0	.04
Dec 16	8:05 AM	SimiValley CA	805-306-0180	Day	1.0	.10
Dec 16	9:35 AM	SimiValley CA	805-306-0180	Day	1.0	.10
Dec 16	4:57 PM	SimiValley CA	805-306-0180	Day	1.0	.10
Dec 17	8:40 AM	SimiValley CA	805-306-0180	Day	1.0	.10
Dec 17	9:02 AM	SimiValley CA	805-306-0180	Day	1.0	.10
Dec 17	4:58 PM	SimiValley CA	805-306-0180	Day	1.0	.10
Dec 17	9:23 PM	SimiValley CA	805-306-0180	Eve	1.0	.07
Dec 18	10:43 AM	SimiValley CA	805-306-0300	Day	47.0	1.94
Dec 18	3:21 PM	SimiValley CA	805-306-0300	Day	2.0	.14
Dec 19	12:24 PM	SimiValley CA	805-306-0180	Night	1.0	.04
Dec 19	11:32 PM	SimiValley CA	805-306-0180	Night	2.0	.06
Dec 20	8:10 PM	SimiValley CA	805-306-0180	Night	1.0	.04
Dec 21	7:27 AM	SimiValley CA	805-306-0180	Night	1.0	.04
Dec 21	6:48 PM	SimiValley CA	805-306-0180	Eve	2.0	.10
Dec 23	10:44 AM	SimiValley CA	805-306-0300	Day	6.0	.30
Dec 23	10:50 AM	SimiValley CA	805-306-0300	Day	3.0	.18
Dec 23	11:32 AM	SimiValley CA	805-306-0180	Day	1.0	.10
Dec 23	11:42 AM	SimiValley CA	805-306-0300	Day	4.0	.22
Dec 23	3:59 PM	SimiValley CA	805-306-0180	Day	1.0	.10
Dec 23	4:38 PM	SimiValley CA	805-306-0180	Day	1.0	.10
Dec 23	8:22 PM	SimiValley CA	805-306-0180	Eve	1.0	.07
Dec 23	9:13 PM	SimiValley CA	805-306-0180	Eve	1.0	.07
Dec 24	1:49 AM	SimiValley CA	805-306-0180	Night	1.0	.04
Dec 24	2:37 AM	SimiValley CA	805-306-0180	Night	1.0	.04
Dec 24	11:12 AM	SimiValley CA	805-306-0180	Day	1.0	.10
Dec 24	11:13 AM	SimiValley CA	805-306-0180	Day	2.0	.14
Dec 25	12:29 AM	SimiValley CA	805-306-0180	Night	2.0	.06
Dec 28	10:17 AM	SimiValley CA	805-306-0180	Day	1.0	.10
Dec 28	7:34 PM	SimiValley CA	805-306-0180	Eve	1.0	.07
Dec 30	7:14 PM	SimiValley CA	805-306-0180	Eve	1.0	.07
Dec 31	3:18 AM	SimiValley CA	805-306-0180	Night	2.0	.06
Dec 31	7:58 AM	SimiValley CA	805-306-0180	Night	1.0	.04
Dec 31	2:53 PM	SimiValley CA	805-306-0180	Day	1.0	.10
Dec 31	4:07 PM	SimiValley CA	805-306-0180	Day	1.0	.10
Jan 1	11:14 AM	SimiValley CA	805-306-0180	Night	1.0	.04
Jan 1	12:20 PM	SimiValley CA	805-306-0180	Night	1.0	.04
Jan 4	12:08 PM	SimiValley CA	805-306-0300	Day	49.0	2.02
Jan 4	1:09 PM	SimiValley CA	805-306-0300	Day	22.0	.94
Jan 4	1:47 PM	SimiValley CA	805-306-0180	Day	2.0	.14
Jan 4	2:02 PM	SimiValley CA	805-306-0300	Day	30.0	1.26
Jan 4	2:41 PM	SimiValley CA	805-306-0300	Day	1.0	.10
Jan 4	5:20 PM	SimiValley CA	805-306-0300	Eve	3.0	.13
Jan 4	5:38 PM	SimiValley CA	805-306-0300	Eve	3.0	.13
Jan 5	11:00 AM	SimiValley CA	805-306-0300	Day	2.0	.14
Jan 5	11:30 AM	SimiValley CA	805-306-0300	Day	3.0	.18
Jan 5	11:35 AM	SimiValley CA	805-306-0300	Day	2.0	.14
Jan 6	4:48 PM	SimiValley CA	805-306-0300	Day	4.0	.22
Jan 6	4:53 PM	SimiValley CA	805-306-0300	Day	1.0	.10
Jan 14	3:30 PM	SimiValley CA	805-306-0300	Day	6.0	.30
Jan 14	4:18 PM	SimiValley CA	805-306-0180	Day	1.0	.10
Jan 14	4:28 PM	Vntra Cntl CA	805-306-0180	Day	6.0	.30
Jan 14	7:11 PM	SimiValley CA	805-306-0180	Eve	1.0	.07
Jan 14	7:13 PM	SimiValley CA	805-306-0180	Eve	1.0	.07
Jan 15	2:48 PM	SimiValley CA	805-306-0300	Day	1.0	.10

Total Zone Unit Charges
\$11.65

EXHIBIT B, page 4 of 4