

**DISTRICT OF COLUMBIA COURT OF APPEALS
BOARD ON PROFESSIONAL RESPONSIBILITY**



In the Matter of :
 :
 : **Board Docket No. 22-BD-022**
MEHAK NAVEED, ESQUIRE : **Discip. Docket No. 2019-D191**
 :
 :
 : **Respondent.** :
 :
 :
District of Columbia Court of Appeals :
Bar Number: 1032942 :
Date of Admission: July 8, 2016 :
 :

ANSWER TO THE SPECIFICATION OF CHARGES

Respondent Mehak Naveed (Ms, Naveed), appearing *pro se*, submits her response to the Specification of Charges filed against her.

1. With the exception of paragraph number 1, Ms. Naveed generally denies all allegations in the Specification of Charges (SOC).

Ms. Naveed reserves the right to file an Amended Answer and/or supplement it in these proceedings to plead additional pleas, affirmative defenses, cross-claims or third-party claims, as applicable, after further investigation and discovery. It should also be noted that Ms. Naveed is in the process of seeking an attorney (through the grant permitted by the Board) and a protective order in order

to properly defend herself. Accordingly, it may become incumbent upon Ms. Naveed to amend and/or supplement her Answer.¹

Ms. Naveed alleges that the SOC, and each purported rule violation contained therein, is barred in whole or in part because any delays allegedly caused by Ms. Naveed was not the result of any of her acts, omissions or other conduct. Further, any alleged delay was caused in part or in whole by third parties or intervening occurrences.

Respondent alleges that the SOC, and each purported rule violation contained therein, is barred in whole or in part because the District of Columbia Superior Civil Court has already contemplated and decided on the issues listed in this SOC. Petitioner (Disciplinary Counsel) was a party in a related case before the Court and he was provided ample opportunity to address these issues and his position therein, which he did. The Court, after all the issues raised in the SOC, eventually granted a Motion to Vacate in the Respondent's favor.

The SOC represents an overreaching, superficial, and an exaggerated view that distorts the factual record as a whole because it fails to address and/or comprehend the complexity and nuances of the actual facts and issues at hand. This

¹ This Answer is drafted bearing in mind the legal protection afforded to the use and treatment of the confidential and privileged information/documentation, which must not be compromised by enumerating the information (even partially) contained therein, unless a protective order is issued in the first instance.

case as constituted should be dismissed. I also ask for such relief as the Board and the Committee finds equitable and just.

_____/s/_____
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CERTIFICATE OF SERVICE

I hereby certify that a copy of this Answer is simultaneously being emailed to the Office of Executive Attorney at casemanagers@dcbpr.org and to the Assistant Disciplinary Counsel, Ebhetaj (Eby) Kalantar at kalantare@dcodec.org on August 31, 2022.

_____/s/_____
Mehak Naveed