

**IN THE SUPREME COURT OF PENNSYLVANIA**

OFFICE OF DISCIPLINARY COUNSEL,	:	No. 2897 Disciplinary Docket No. 3
	:	
	:	
Petitioner	:	No. 30 DB 2022
v.	:	
	:	
	:	Attorney Registration No. 307225
NICHOLAS URICK,	:	
	:	
Respondent	:	(Beaver County)

**ORDER**

**PER CURIAM**

**AND NOW**, this 10<sup>th</sup> day of August, 2022, upon consideration of the Verified Statement of Resignation, Nicholas Urick is disbarred on consent from the Bar of this Commonwealth. See Pa.R.D.E. 215. Respondent shall comply with the provisions of Pa.R.D.E. 217 and pay costs to the Disciplinary Board pursuant to Pa.R.D.E. 208(g).

A True Copy Nicole Traini  
As Of 08/10/2022

Attest:   
Chief Clerk  
Supreme Court of Pennsylvania

BEFORE THE DISCIPLINARY BOARD OF  
THE SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL,	:	
Petitioner	:	
	:	No. 30 DB 2022
v.	:	
	:	Atty. Registration No. 307225
NICHOLAS URICK,	:	
Respondent	:	(Beaver)

RESIGNATION  
UNDER Pa.R.D.E. 215

Nicholas Urick, Esquire, hereby tenders his unconditional resignation from the practice of law in the Commonwealth of Pennsylvania in conformity with Pa.R.D.E. 215 ("Enforcement Rules") and further states as follows:

1. He is an attorney admitted in the Commonwealth of Pennsylvania, having been admitted to the bar on or about November 4, 2009. His attorney registration number is 307225.

2. He desires to submit his resignation as a member of said bar.

3. His resignation is freely and voluntarily rendered; he is not being subjected to coercion or duress and he is fully aware of the implications of submitting this resignation.

FILED  
07/13/2022  
The Disciplinary Board of the  
Supreme Court of Pennsylvania

4. He acknowledges that he is fully aware of his right to consult and employ counsel to represent him in the instant proceeding. He has/has not retained, consulted with, and acted upon the advice of counsel in connection with his decision to execute the within resignation.

5. He is aware that there is presently pending a prosecution of allegations that he has been guilty of misconduct, the nature of which is set forth in the Petition for Discipline filed by the Office of Disciplinary Counsel on or about March 2, 2022. A true and correct copy of this Petition for Discipline is attached hereto as Exhibit A.

6. He acknowledges that the material facts which form the basis of this Petition for Discipline are true by virtue of his failure to respond to the Petition for Discipline.

7. He is also aware that there is presently pending an investigation into allegations that he has been guilty of misconduct, the nature of which allegations have been known to him by service from the Office of Disciplinary Counsel, of a Letter Request for Statement of Respondent's Position (Form DB-7) served on the Respondent in the disciplinary matter at ODC File Reference #C4-22-33, which is attached hereto as Exhibit B.

8. He acknowledges that the material facts upon which the complaint is predicated contained in Exhibit B are true.

9. He submits the within resignation because he knows that he could not successfully defend himself against the charges of professional misconduct set forth in the attached Exhibits.

10. He is fully aware that the submission of this Resignation Statement is irrevocable and that he can only apply for reinstatement to the practice of law pursuant to the provisions of Enforcement Rule 218(b) and (c).

11. He is aware that, pursuant to Enforcement Rule 215(c), the fact that he has tendered his resignation shall become a matter of public record immediately upon delivery of the resignation statement to Disciplinary Counsel or the Board Prothonotary.

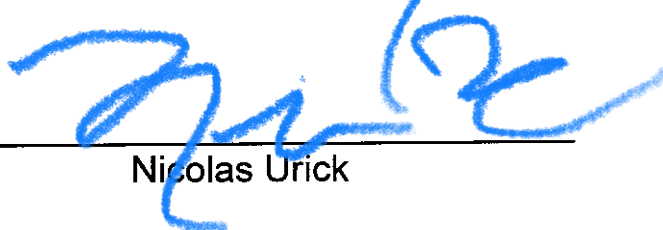
12. Upon entry of the order disbaring him on consent, he will promptly comply with the notice, withdrawal, resignation, trust account, and cease-and-desist provisions of Enforcement Rule 217 (a), (b), (c) and (d).

13. After entry of the order disbaring him on consent, he will file a verified statement of compliance as required by Enforcement Rule 217(e) (1).

14. He is aware that the waiting period for eligibility to apply for reinstatement to the practice of law under Enforcement Rule 218(b) shall not begin until he files the verified statement of compliance required by Enforcement Rule 217(e)(1), and if the order of disbarment contains a provision that makes the disbarment retroactive to an earlier date, then the waiting period will be deemed to have begun on that earlier date.

It is understood that the statements made herein are subject to the penalties of 18 Pa.C.S.A., Section 4904 (relating to unsworn falsification to authorities).

Signed this 13<sup>th</sup> day of July, 2022.

  
\_\_\_\_\_  
Nicolas Urick

WITNESS: \_\_\_\_\_

BEFORE THE DISCIPLINARY BOARD OF THE  
SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL, :

Petitioner :

No.<sup>30</sup> DB 2022

v. :

NICHOLAS URICK, :

Attorney Registration No. 307225

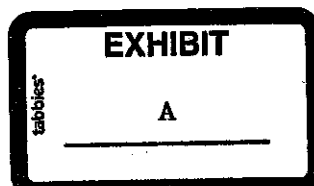
Respondent :

(Beaver County)

PETITION FOR DISCIPLINE

Petitioner, Office of Disciplinary Counsel, by Thomas J. Farrell, Chief Disciplinary Counsel, and LaTammie D. Bivins, Disciplinary Counsel, files the within Petition for Discipline, and charges Respondent Nicholas Urick with professional misconduct in violation of the Rules of Professional Conduct and the Pennsylvania Rules of Disciplinary Enforcement as follows:

1. Petitioner, whose principal office is located at Pennsylvania Judicial Center, Suite 2700, 601 Commonwealth Avenue, P.O. Box 62485, Harrisburg,



FILED  
03/02/2022  
The Disciplinary Board of the  
Supreme Court of Pennsylvania

PA 17106-2485, is invested, pursuant to Rule 207 of the Pennsylvania Rules of Disciplinary Enforcement (hereafter "Pa.R.D.E."), with the power and the duty to investigate all matters involving alleged misconduct of an attorney admitted to practice law in the Commonwealth of Pennsylvania and to prosecute all disciplinary proceedings brought in accordance with the various provisions of the aforesaid Rules.

2. Respondent, Nicholas Urick, was born in 1984. He was admitted to practice law in the Commonwealth of Pennsylvania on November 4, 2009. Respondent's attorney registration mailing address is 150 Pleasant Drive, Suite 105, Aliquippa, PA 15001.

3. Respondent is subject to the disciplinary jurisdiction of the Disciplinary Board of the Supreme Court of Pennsylvania.

4. On December 23, 2021, by certified mail, return receipt requested, Petitioner served on Respondent a DB-7 Request for Statement of Respondent's Position averring the facts set forth *infra*.

CHARGE I: THE DANYA SOLTIS MATTER

5. On August 14, 2020, Respondent initiated a civil action by the filing of a Praecipe for Writ of Summons on behalf of Danya Soltis (hereinafter "Ms. Soltis") for the case of *Danya Soltis v. Brandi Burns* in the Court of Common Pleas of Beaver County at docket number 2020-10835. This civil action stemmed from personal injuries sustained by Ms. Soltis in a motor vehicle accident in Beaver County, Pennsylvania.

6. On December 11, 2020, Respondent filed a Complaint in Civil action at docket number 2020-10835 on behalf of Ms. Soltis.

7. Defendant was served with the complaint and defense counsel entered his appearance.

8. By letter dated December 4, 2020, defense counsel sent Respondent Interrogatories and a Request for Production of Documents.

9. On December 20, 2020, Respondent sent Ms. Soltis an email requesting that she respond to the questions contained in the Interrogatories and Request for Production of Documents.

10. Ms. Soltis promptly responded to the questions and forwarded the answers to Respondent.

11. Respondent did not provide Ms. Soltis' responses to defense counsel.

12. On January 19, 2021, defense counsel filed an Answer and New Matter on behalf of his client.

13. On or about February 4, 2021, after Respondent failed to submit responses to the Interrogatories and Request for Production of Documents, defense counsel filed and presented a Motion to Compel.

14. By Order of Court dated February 4, 2021, the Honorable Laura J. Tocci (hereinafter "Judge Tocci") directed Respondent to answer the defendant's Interrogatories and Request for Production of Documents within 20 days of the date of the court order or suffer further sanctions.

15. Respondent received a copy of the February 4, 2021 Order of Court.

16. Respondent did not advise Ms. Soltis of the February 4, 2021 court order.

17. By letter dated March 8, 2021, defense counsel copied Respondent on a Motion for Sanctions that he intended to present to the presiding judge on Thursday, March 11, 2021, as a result of Respondent's failure to submit the discovery responses by the deadline set forth in the February 4, 2021, Order of Court.

18. Respondent did not advise Ms. Soltis of the Motion for Sanctions.

19. On March 11, 2021, Judge Tocci heard defense counsel's motion. By Order of Court dated March 11, 2021, Judge Tocci imposed a deadline of March 25, 2021, for Respondent to complete and submit verified responses to defendant's discovery requests. Ms. Soltis was also barred from offering into evidence at the time of trial any evidence or testimony concerning the matters addressed in the defendant's Interrogatories and Request for Production of Documents.

20. Respondent received a copy of Judge Tocci's March 11, 2021, Order of Court.

21. Respondent did not advise Ms. Soltis of the March 11, 2021 Order of Court.

22. On April 12, 2021, defense counsel filed an Affidavit of Noncompliance with Court-ordered Discovery because Respondent failed to submit the discovery in compliance with the March 11, 2021, order.

23. Respondent did not advise Ms. Soltis of the Affidavit of Noncompliance with Court-ordered Discovery.

24. On May 17, 2021, defense counsel filed a Motion for Summary Judgment, a brief in support of the Motion for Summary Judgment, and a Praecipe for Argument.

25. A hearing on the summary judgment motion was scheduled for June 16, 2021.

26. Respondent received the Motion for Summary Judgment, brief in support of the Motion for Summary Judgment and Praecipe for Argument.

27. Respondent received notice of the hearing on the Motion for Summary Judgment.

28. Respondent did not file a response to the Motion for Summary Judgment.

29. Respondent did not advise Ms. Soltis of the filing of the Motion for Summary Judgment, nor that a hearing had been scheduled.

30. On May 25, 2021, a notice for pretrial conference was filed. The conference was scheduled for June 23, 2021, before the Honorable James J. Ross (hereinafter "Judge Ross").

31. On June 11, 2021, defense counsel filed a pretrial statement.

32. On June 16, 2021, following argument on the Motion for Summary Judgment, Judge Ross entered an Order of Court granting defendant's Motion for Summary Judgment.

33. Respondent received a copy of the June 16, 2021, Order of Court granting the Motion for Summary Judgment.

34. Respondent did not advise Ms. Soltis of the June 16<sup>th</sup> court order dismissing her cause of action.

35. Respondent did not conduct any discovery in support of Ms. Soltis' case.

36. By his conduct as alleged in Paragraphs 5 through 35 above, Respondent violated the following Rules of Professional Conduct: and

(a) Rule of Professional Conduct 1.1 – A lawyer shall provide competent representation to a client.

(b) Rule of Professional Conduct 1.3 – A lawyer shall act with reasonable diligence and promptness in representing a client.

(c) Rule of Professional Conduct 1.4(a)(2) – A lawyer shall reasonably consult with a client about the means by which the client's objectives are to be accomplished.

(d) Rule of Professional Conduct 1.4(a)(3) – A lawyer shall keep the client reasonably informed about the status of the matter.

(e) Rule of Professional Conduct 1.4(b) - A lawyer shall explain a matter to the extent reasonably necessary to permit the client to make informed decisions regarding the representation.

(f) Rule of Professional Conduct 3.2 - A lawyer shall make reasonable efforts to expedite litigation consistent with the interests of the client.

(g) Rule of Professional Conduct 8.4(d) – It is professional misconduct for a lawyer to engage in conduct that is prejudicial to the administration of justice.

#### CHARGE II: THE JAMES CECCARELLI MATTER

37. Respondent was retained to represent James Ceccarelli (hereinafter “Mr. Ceccarelli”) in connection with a civil claim stemming from personal injuries he sustained in an automobile accident in Beaver County, Pennsylvania.

38. Respondent had not previously represented Mr. Ceccarelli.

39. Respondent did not provide Mr. Ceccarelli any writing setting forth the basis or rate of his fee, either before or within a reasonable period of time after his representation began.

40. Respondent did not provide Mr. Ceccarelli a written contingent fee agreement stating the method by which the fee was to be determined, including the percentage or percentages that shall accrue to the lawyer in the event of settlement, trial or appeal, litigation, and other expenses to be deducted from the recovery, and whether such expenses were to be deducted before or after the contingent fee is calculated.

41. On December 2, 2020, Respondent initiated a civil action on behalf of Mr. Ceccarelli by filing a Praecipe for Writ of Summons for the case of *James Ceccarelli v. Nicole Nadzam* in the Court of Common Pleas of Beaver County, at docket number 2020-11327.

42. The defendant was served with the Writ of Summons on December 4, 2020. Defense counsel entered his appearance on March 18, 2021.

43. By Order of Court dated March 23, 2021, Judge Tocci established a case management schedule that set a deadline of April 12, 2021, for the

filing of a complaint. The Order of Court further imposed a discovery deadline of July 20, 2021.

44. Respondent received the March 23, 2021 Order of Court.

45. Respondent did not advise Mr. Ceccarelli of the March 23 2021 Order of Court.

46. Respondent failed to file a complaint by the April 12, 2021, deadline.

47. On or about March 22, 2021, defense counsel served Respondent with Interrogatories and Request for Production of Documents.

48. Respondent did not provide responses to the Interrogatories and Request for Production of Documents.

49. On June 10, 2021, defense counsel filed a Motion to Compel after Respondent failed to comply with the March 22, 2021, Order of Court.

50. By Order of Court dated June 10, 2021, Judge Ross granted defense counsel's Motion to Compel and ordered Respondent to respond to

the Interrogatories and Request for Production of Documents within 10 days of the Court's order or suffer further sanctions by the Court.

51. Respondent received a copy of the June 10, 2021 Order of Court.

52. Respondent did not advise Mr. Ceccarelli of the June 10, 2021 Order of Court.

53. Respondent did not comply with the June 10, 2021 Order of Court.

54. By Order of Court dated August 2, 2021, Judge Ross, upon his own motion, ordered Respondent to appear in civil motions court on Thursday, August 12, 2021, to show cause why Mr. Ceccarelli's case should not be dismissed for failure to comply with the Court Order of March 23, 2021, directing him to file a Complaint and engage in, or respond to, any discovery. It was further ordered that counsel's failure to appear would result in the dismissal of Mr. Ceccarelli's case.

55. Respondent received a copy of the August 2, 2021, Order of Court.

56. Respondent did not advise Mr. Ceccarelli of the August 2, 2021, Order of Court.

57. Respondent appeared before Judge Ross on August 12, 2021. By Order of Court dated August 12, 2021, Judge Ross denied defense counsel's request to dismiss the case. However, Judge Ross ordered Respondent to file the complaint and fully respond to the defendant's discovery requests by August 27, 2021, with notice that Respondent's failure to do so would result in dismissal of the case.

58. Respondent did not advise Mr. Ceccarelli of the August 12, 2021 Order of Court.

59. Respondent filed a complaint in civil action on August 27, 2021.

60. Respondent failed to conduct discovery in support of Mr. Ceccarelli's case.

61. On September 9, 2021, defense counsel filed and presented a Motion to Dismiss alleging, *inter alia*, that Plaintiff filed a complaint that was unverified; and, Plaintiff did not respond to any of the discovery requests by August 27, 2021. Defense counsel requested that the case be dismissed for Respondent's failure to comply with the August 12, 2021, Order of Court.

62. Respondent received a copy of the Motion to Dismiss.
63. Respondent did not advise Mr. Ceccarelli of the Motion to Dismiss.
64. Respondent failed to appear and oppose the Motion to Dismiss.
65. By Order of Court dated September 9, 2021, Judge Ross granted defense counsel's motion and dismissed Mr. Ceccarelli's case with prejudice.
66. Respondent received a copy of the September 9, 2021, Order of Court.
67. Respondent did not advise Mr. Ceccarelli of the September 9, 2021 Order of Court dismissing his civil complaint.
68. On October 12, 2021, Respondent filed a Notice of Appeal to the Superior Court of Pennsylvania, at docket number 1221 WDA 2021, on Mr. Ceccarelli's case.
69. Respondent did not advise Mr. Ceccarelli that he filed an appeal on his behalf.

70. By Order of Court dated October 21, 2021, Respondent was directed to file a Concise Statement of Errors Complained of on Appeal in accordance with Pa.R.A.P. 1925(b) within twenty-one (21) days, or on or before November 12, 2021.

71. Respondent received a copy of the October 21, 2021, Order of Court.

72. Respondent did not advise Mr. Ceccarelli of the October 21, 2021 Order of Court.

73. Respondent failed to file the Concise Statement of Errors Complained of on Appeal.

74. By Order of Court dated November 18, 2021, Judge Ross determined that Mr. Ceccarelli's appellate rights were waived for failure to timely file the Concise Statement of Errors Complained of on Appeal.

75. Respondent received a copy of the November 18, 2021, Order of Court.

76. Respondent did not advise Mr. Ceccarelli of the November 18, 2021, Order of Court.

77. Mr. Ceccarelli contacted Respondent in late November 2021 to inquire about the status of his case.

78. Respondent informed Mr. Ceccarelli that there had been an issue with the discovery in his case, but that he did not believe that he was required to provide the information to opposing counsel.

79. Respondent did not, at that time, or any time thereafter, inform Mr. Ceccarelli that his civil case had been dismissed with prejudice, but instead implied the case was still active.

80. By Order of Court dated January 10, 2022, the Superior Court of Pennsylvania dismissed Mr. Ceccarelli's appeal for failure to comply with Pa.R.A.P. 3517.

81. Respondent received the January 10, 2022, Order of Court.

82. Respondent did not advise Mr. Ceccarelli of the dismissal of his appeal.

83. By his conduct as alleged in Paragraphs 37 through 82 above, Respondent violated the following Rules of Professional Conduct:

(a) Rule of Professional Conduct 1.1 – A lawyer shall provide competent representation to a client.

(b) Rule of Professional Conduct 1.3 – A lawyer shall act with reasonable diligence and promptness in representing a client.

(c) Rule of Professional Conduct 1.4(a)(2) – A lawyer shall reasonably consult with a client about the means by which the client's objectives are to be accomplished.

(d) Rule of Professional Conduct 1.4(a)(3) – A lawyer shall keep the client reasonably informed about the status of the matter.

(e) Rule of Professional Conduct 1.4(b) - A lawyer shall explain a matter to the extent reasonably necessary to permit the client to make informed decisions regarding the representation.

(f) Rule of Professional Conduct 1.5(b) - When a lawyer has not regularly represented the client, the basis or rate of the fee

---

shall be communicated to the client, in writing, before or within a reasonable time after commencing the representation.

(g) Rule of Professional Conduct 1.5(c) – A contingent fee agreement shall be in writing and shall state the method by which the fee is to be determined, including the percentage or percentages that shall accrue to the lawyer in the event of settlement, trial or appeal, litigation and other expenses to be deducted from the recovery, and whether such expenses are to be deducted before or after the contingent fee is calculated.

(h) Rule of Professional Conduct 3.2 - A lawyer shall make reasonable efforts to expedite litigation consistent with the interests of the client.

(i) Rule of Professional Conduct 8.4(c) – It is professional misconduct for a lawyer to engage in conduct involving dishonesty, fraud, deceit, or misrepresentation.

(j) Rule of Professional Conduct 8.4(d) – It is professional misconduct for a lawyer to engage in conduct that is prejudicial to the administration of justice.

**CHARGE III: THE DEAN AND MICHELLE WESTON MATTER**

84. In early September of 2020, Respondent was retained by Dean and Michelle Weston (hereinafter “the Westons”) to represent them in connection with an Enforcement Notice from Hanover Township dated September 2, 2020, regarding their trucking business.

85. On October 2, 2020, Respondent filed an appeal of the Enforcement Notice. A hearing was held before the Hanover Township Zoning Hearing Board (hereinafter “the Board”) on October 26, 2020. Respondent represented the Westons at the October 26, 2020, hearing.

86. Following the hearing, the Board found that the operation of the Westons’ trucking business at the subject property violated the Hanover Township Zoning Ordinance.

87. By check dated October 28, 2020, the Westons paid Respondent a retainer of \$1,750 to file an appeal of the Board's decision against them.

88. On December 15, 2020, a second hearing was held before the Board at which time the Board publicly voted to deny the Westons' requested relief.

89. Respondent represented the Westons at the December 15, 2020, hearing.

90. The Westons had thirty (30) days to appeal the December 15, 2020, decision to the Court of Common Pleas.

91. On January 15, 2021, Respondent filed a Notice of Appeal of the December 15, 2020, decision of the Board to the Court of Common Pleas of Beaver County at docket number 2021-10060.

92. The Notice of Appeal was filed after the appeal period had expired.

93. On February 11, 2021, Respondent filed a Praecipe for Appearance on behalf of the Westons.

---

94. On March 26, 2021, an initial case management conference was scheduled for Monday, April 26, 2021, before Judge Ross.

95. On April 20, 2021, Hanover Township filed a Case Management Statement.

96. By Order of Court dated April 26, 2021, Judge Ross ordered the Plaintiffs to file their brief in support of the appeal on or before June 4, 2021.

97. Respondent received a copy of the April 26, 2021, Order of Court.

98. On June 4, 2021, Respondent filed a brief on behalf of the Westons.

99. On August 30, 2021, Judge Ross issued a Memorandum Opinion and Order of Court wherein he found that the Westons had not timely filed their appeal to the Court of Common Pleas and affirmed the decision of the Board. Judge Ross concluded that even if the appeal had been timely filed, the Westons would not have prevailed on the merits of the case.

100. Respondent received a copy of the August 30, 2021, Memorandum Order of Court.

101. Respondent advised the Westons of the August 30, 2021, denial of their appeal to the Court of Common Pleas.

102. On September 29, 2021, Respondent filed a Notice of Appeal to the Commonwealth Court of Pennsylvania on behalf of the Westons.

103. Respondent informed the Westons that he had filed an appeal to Commonwealth Court.

104. By Order of Court dated October 7, 2021, Judge Ross ordered the Westons to file a Concise Statement of Errors Complained of on Appeal in accordance with Pa.R.A.P. 1925(b) within twenty-one (21) days, or on or before October 25, 2021.

105. Respondent received a copy of the October 7, 2021, Order of Court.

106. Respondent did not advise the Westons of the October 7, 2021, Order of Court.

107. Respondent did not file a Concise Statement of Errors Complained of on Appeal in compliance with Judge Ross' October 7, 2021, Order of Court.

108. On October 7, 2021, Respondent sent the Westons an invoice in the amount of \$2,750 for the Commonwealth Court appeal.

109. By check dated October 19, 2021, the Westons paid Respondent's requested fee.

110. Respondent performed no other work on the Westons' case after receiving payment for the Commonwealth Court appeal.

111. By Order of Court dated November 3, 2021, Judge Ross determined that the Westons' appellate rights were waived for failure to timely file a Concise Statement of Errors Complained of on Appeal in accordance with the Court's Order of October 7, 2021.

112. Respondent received the November 3, 2021 Order of Court.

113. Respondent did not advise the Westons of the November 3, 2021, Order of Court determining that their appellate rights had been waived.

114. Respondent took no further action to preserve the Westons' appellate rights.

115. For the duration of Respondent's representation of the Westons, he did not timely return phone calls or respond to requests for information.

116. By email dated January 17, 2022, Ms. Weston terminated Respondent's services.

117. As a result of Respondent's failure to respond to their requests for information, the Westons retained new counsel to represent them in their Commonwealth Court Appeal.

118. By his conduct as alleged in Paragraphs 84 through 117 above, Respondent violated the following Rules of Professional Conduct:

(a) Rule of Professional Conduct 1.1 – A lawyer shall provide competent representation to a client.

(b) Rule of Professional Conduct 1.3 – A lawyer shall act with reasonable diligence and promptness in representing a client.

(c) Rule of Professional Conduct 1.4(a)(2) – A lawyer shall reasonably consult with a client about the means by which the client's objectives are to be accomplished.

(d) Rule of Professional Conduct 1.4(a)(3) – A lawyer shall keep the client reasonably informed about the status of the matter.

(e) Rule of Professional Conduct 1.4(a)(4) – A lawyer shall promptly comply with reasonable requests for information.

(f) Rule of Professional Conduct 1.4(b) - A lawyer shall explain a matter to the extent reasonably necessary to permit the client to make informed decisions regarding the representation.

(g) Rule of Professional Conduct 3.2 - A lawyer shall make reasonable efforts to expedite litigation consistent with the interests of the client.

(h) Rule of Professional Conduct 8.4(d) – It is professional misconduct for a lawyer to engage in conduct that is prejudicial to the administration of justice.

#### CHARGE IV: THE BARB AND JOHN PLUTKO MATTER

119. On or about November 28, 2018, Respondent was retained by Barb and John Plutko in connection with a civil claim against Home Depot arising from personal injuries sustained by Ms. Plutko on or about November 12, 2018.

120. On November 12, 2020, Respondent filed a Praecipe for Writ of Summons to initiate the civil case of *Barb Plutko and her husband, John Pluto, v. The Home Depot, Home Depot Group USA, Inc. t/d/b/a The Home Depot*, in the Court of Common Pleas of Beaver County at docket number 11232 of 2020. The defendant was served with the Writ of Summons on December 9, 2020.

121. On January 28, 2021, Judge Tocci, the presiding judge, scheduled a case management conference for February 22, 2021.

122. On February 22, 2021, Respondent filed a civil case summary on behalf of his clients.

123. On March 24, 2021, defense counsel entered his appearance on behalf of the defendant and filed a Praecipe for Rule to File a Complaint.

124. On April 16, 2021, Respondent filed a Complaint in Civil Action on behalf of his clients.

125. On May 7, 2021, Respondent was served with Defendant's Interrogatories and Request for Production of Documents.

126. Respondent did not initially advise the Plutkos of the discovery requests.

127. Respondent did not conduct discovery in support of the Plutkos' case.

128. By Order of Court dated May 25, 2021, Judge Ross approved defense counsel's motion to extend the case management deadlines and ordered pleadings to close on June 30, 2021, and the completion of discovery on or before September 1, 2021.

129. Respondent received the May 25, 2021, Order of Court.

130. On June 4, 2021, defense counsel filed an Answer and New Matter to the Complaint in Civil Action.

131. Respondent received a copy of the Answer and New Matter.

132. Respondent did not reply to the New Matter.

133. Respondent did not advise the Plutkos of the Answer and New Matter he received from Defendant's counsel.

134. In or about July 2021, Ms. Plutko met with Respondent to discuss the defendant's discovery request. The meeting lasted approximately fifteen (15) minutes. Ms. Plutko answered very few questions before Respondent abruptly ended the meeting by advising her that he would provide the remaining answers in his own words.

135. Respondent did not provide the discovery responses to defense counsel.

136. By text message on August 13, 2021, Ms. Plutko asked Respondent if he had forwarded a report to Home Depot. She also asked

Respondent how long before this would be resolved. Respondent did not reply to Ms. Plutko on August 13, 2021.

137. By text message dated August 14, 2021, Ms. Plutko asked Respondent why he never answers his phone, email or text messages and requested a status update on her case.

138. By text message dated August 16, 2021, Respondent advised Ms. Plutko that if he is busy, he would get back to her as soon as possible and stated that he had provided materials to the attorney and was awaiting his response.

139. On September 7, 2021, defense counsel filed a Motion to Compel Plaintiff's discovery responses.

140. Respondent received a copy of defense counsel's Motion to Compel Plaintiff's discovery responses.

141. Respondent did not advise the Plutkos of the Motion to Compel Plaintiff's discovery responses.

142. By Order of Court dated September 7, 2021, Judge Ross scheduled a case management conference for September 28, 2021, to address the delay in the case and to set a new schedule. Judge Ross also ordered Plaintiffs to provide full and complete Answers to Interrogatories and Responses to Requests for Production of Documents within ten (10) days.

143. Respondent received the September 7, 2021, Order of Court.

144. Respondent did not advise the Plutkos of the September 7, 2021 Order of Court.

145. Respondent did not attend the September 28, 2021, case management conference.

146. By Order of Court dated September 28, 2021, Judge Tocci, sua-sponte, found that Respondent failed to appear; that his conduct was dilatory, obdurate, and vexatious; and imposed, pursuant to 42 Pa.C.S.A. § 2503, and ordered counsel fees in the amount of \$400 to be paid to defense counsel. Judge Tocci further ordered that Respondent's failure to pay the counsel fees would result in further sanctions and that she would consider, upon appropriate motion by the defense, further sanctions for Respondent's failure

to provide full and complete answers to interrogatories and responses to requests for production of documents as ordered to be provided within 10 days of September 7, 2021.

147. Respondent received a copy of the September 28, 2021 Order of Court.

148. Respondent did not advise the Plutkos of the September 28, 2021, Order of Court.

149. By text message on October 8, 2021, Ms. Plutko asked Respondent whether he needed a copy of a medical bill she had received. Respondent failed to respond to Ms. Plutko's text message.

150. By Order of Court dated October 8, 2021, Judge Tocci issued a Rule to Show Cause directed to Respondent.

151. Respondent received a copy of the Rule to Show Cause.

152. Respondent did not advise the Plutkos of the October 8, 2021, Rule to Show Cause.

153. By text message on October 12, 2021, Ms. Plutko, again, asked Respondent if he needed a copy of a medical bill and asked about the status of her case.

154. By text message on October 13, 2021, Respondent replied to Ms. Plutko's text message with "Yes I will need that eventually." He did not provide a status update on her case.

155. On October 15, 2021, Respondent filed an Answer to the Rule to Show Cause stating that he had provided responses to defense counsel's discovery requests on October 6, 2021.

156. Respondent's October 6, 2021, response to the defendant's discovery request was not in compliance with the September 7, 2021, Order of Court directing that Respondent provide responses within ten (10) days.

157. Respondent did not advise the Plutkos of his Answer to the Rule to Show Cause.

158. On October 15, 2021, defense counsel presented a Motion to Dismiss Plaintiff's Complaint as a Sanction for Failure to Comply with the Order of Court of September 7, 2021.

159. Respondent received a copy of the Motion to Dismiss.

160. Respondent did not advise the Plutkos of the Motion to Dismiss.

161. By Order of Court dated October 15, 2021, Judge Tocci denied the Motion to Dismiss but prohibited plaintiff from any further discovery in the case. Judge Tocci also found the continued conduct of Respondent to be obdurate, vexatious, and dilatory. Judge Tocci imposed sanctions for "failure to provide the completed Answer to Interrogatories and Responses to Request for Production of Documents in a timely manner, for failure to appear at the September 28, 2021, status conference and for the attendance required by the Defendant at the Motion to Dismiss and Rule". Judge Tocci ordered Plaintiff to pay \$1,000 in counsel fees to Chartwell Law within fifteen days of the court order. The Order also prohibited Plaintiff from any other discovery in the matter.

162. Respondent did not advise the Plutkos of the Court's October 15, 2021 Order of Court.

163. Respondent did not pay the \$1000 counsel fees imposed in the October 15, 2021 court order.

164. By correspondence dated November 1, 2021, defense counsel advised Respondent that a deposition of Ms. Plutko was scheduled for November 17, 2021, at 10:00 a.m. via Zoom.

165. Respondent did not advise Ms. Plutko that her deposition had been scheduled.

166. By email dated November 16, 2021, Respondent requested that defense counsel reschedule Ms. Plutko's deposition.

167. By correspondence dated November 16, 2021, defense counsel advised Respondent that Ms. Plutko's deposition was rescheduled for December 2, 2021.

168. Respondent did not advise Ms. Plutko that her deposition had been scheduled for December 2, 2021.

169. On November 29, 2021, defense counsel's office attempted to reach Respondent to confirm Ms. Plutko's appearance at the December 2, 2021, deposition.

170. Respondent did not respond to defense counsel's messages.

171. On December 1, 2021, defense counsel's office left another voicemail message and sent an email to Respondent to confirm Mr. Plutko's appearance at the December 2, 2021, deposition.

172. On December 1, 2021, Respondent contacted defense counsel's office and cancelled Mr. Plutko's deposition.

173. On December 6, 2021, defense counsel filed a Second Motion to Dismiss the Plutkos' case.

174. By Order of Court dated December 6, 2021, Judge Ross issued a Rule to Show Cause upon Plaintiffs as to why the case should not be dismissed with prejudice. The rule was returnable on Thursday, December 9, 2021. A hearing was scheduled for Monday, December 13, 2021.

175. Respondent received the Rule to Show Cause.

176. Respondent did not inform the Plutkos of the Rule to Show Cause.

177. Respondent did not reply to the Rule to Show Cause.

178. Respondent did not inform Ms. Plutko of any of the court hearings related to his failure to provide the discovery responses.

179. In late October 2021, Ms. Plutko learned that Respondent had not been diligent in his representation of her and her husband in their civil action when she pulled her case file from the Prothonotary and reviewed it.

180. Ms. Plutko began seeking new counsel after discovering Respondent's failure to perform the necessary work on her case

181. Prior to reviewing her case file, Ms. Plutko was not aware that Respondent had not provided discovery documents to opposing counsel.

182. In December 2021, the Plutkos hired new counsel in an effort to prevent dismissal of their case.

183. The Plutkos' new counsel entered his appearance and appeared at the December 13, 2020, Rule to Show Cause hearing on their behalf.

184. After the Rule to Show Cause hearing, upon advice of counsel, Ms. Plutko paid \$1000 in counsel fees for Chartwell Law to comply with the October 15, 2021 Order of Court.

185. Respondent has not reimbursed Ms. Plutko for the counsel fees she paid to Chartwell Law.

186. Despite Ms. Plutko's repeated requests, Respondent has failed to return the medical records provided to him by Ms. Plutko.

187. By his conduct as alleged in Paragraphs 119 and 186 above, Respondent violated the following Rules of Professional Conduct:

(a) Rule of Professional Conduct 1.1 – A lawyer shall provide competent representation to a client.

(b) Rule of Professional Conduct 1.3 – A lawyer shall act with reasonable diligence and promptness in representing a client.

(c) Rule of Professional Conduct 1.4(a)(2) – A lawyer shall reasonably consult with a client about the means by which the client's objectives are to be accomplished.

(d) Rule of Professional Conduct 1.4(a)(3) – A lawyer shall keep the client reasonably informed about the status of the matter.

(e) Rule of Professional Conduct 1.4(a)(4) – A lawyer shall promptly comply with reasonable requests for information.

(f) Rule of Professional Conduct 1.4(b) - A lawyer shall explain a matter to the extent reasonably necessary to permit the client to make informed decisions regarding the representation.

(g) Rule of Professional Conduct 1.16(d) - Upon termination of representation, a lawyer shall take steps to the extent reasonably practicable to protect a client's interests, such as giving reasonable notice to the client, allowing time for employment of other counsel, surrendering papers and property to which the client is entitled and refunding any advance payment of fee or expense that has not been earned or incurred.

(h) Rule of Professional Conduct 3.2 - A lawyer shall make reasonable efforts to expedite litigation consistent with the interests of the client.

(i) Rule of Professional Conduct 8.4(c) – It is professional misconduct for a lawyer to engage in conduct involving dishonesty, fraud, deceit, or misrepresentation.

(j) Rule of Professional Conduct 8.4(d) – It is professional misconduct for a lawyer to engage in conduct that is prejudicial to the administration of justice.

CHARGE V: ODC

188. The Office of Disciplinary Counsel issued a Request for Statement of Respondent's Position (DB-7) dated December 20, 2021, that encompassed each of the within client matters, and which was sent to Respondent via regular and certified mail, return receipt requested to both his business and home addresses.

189. Respondent received the DB-7 by certified mail on December 23, 2021, as evidenced by a signed return receipt card.

190. As authorized by Disciplinary Board Rule 87.7(b)(2), and approved by Chief Disciplinary Counsel, Respondent was given ten (10) days from the date of the letter to respond to the DB-7.

191. Respondent did not answer the DB7 or contact ODC to address the matter.

192. Respondent has failed to offer any cause for his failure to respond to the DB-7.

193. By his conduct as alleged in Paragraphs 188 through 192 above, Respondent violated the following Pennsylvania Rule of Disciplinary Enforcement:

Rule of Disciplinary Enforcement 203(b)(7) - Failure by a respondent-attorney without good cause to respond to Disciplinary Counsel's request or supplemental request under Disciplinary Board Rules, § 87.7(b) for a statement of the respondent-attorney's position shall be grounds for discipline.

WHEREFORE, Petitioner prays that your Honorable Board appoint, pursuant to Rule 205, Pa.R.D.E., a Hearing Committee to hear testimony and receive evidence in support of the foregoing charges and upon completion of said hearing to make such findings of fact, conclusions of law, and recommendations for disciplinary action as it may deem appropriate.

Respectfully submitted,

OFFICE OF DISCIPLINARY COUNSEL

THOMAS J. FARRELL  
CHIEF DISCIPLINARY COUNSEL



By \_\_\_\_\_

LaTammie D. Bivins  
Disciplinary Counsel  
Attorney Registration No. 79599  
The Disciplinary Board of the  
Supreme Court of Pennsylvania  
Suite 1300, Frick Building  
437 Grant Street  
Pittsburgh, PA 15219  
Telephone: (412) 565-3173

BEFORE THE DISCIPLINARY BOARD OF THE  
SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL, :

Petitioner :

: No. DB 2022

v. :

NICHOLAS URICK, :

: Attorney Registration No. 307225

Respondent :

: (Beaver County)

VERIFICATION

The statements contained in the foregoing Petition for Discipline are true and correct to the best of my knowledge or information and belief and are made subject to the penalties of 18 Pa.C.S. §4904, relating to unsworn falsification to authorities.

March 2, 2022

Date



\_\_\_\_\_  
LaTammie D. Bivins  
Disciplinary Counsel

**CERTIFICATE OF COMPLIANCE**

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: LaTammie D. Bivins

Signature: 

Name: LaTammie D. Bivins

Attorney No. (if applicable): 79599

Thomas J. Farrell  
Chief Disciplinary Counsel

Raymond S. Wierciszewski  
Deputy Chief Disciplinary Counsel

James M. Fox  
Disciplinary Counsel-in-Charge

THE DISCIPLINARY BOARD  
OF THE  
SUPREME COURT OF PENNSYLVANIA

District IV Office  
Frick Building, Suite 1300  
437 Grant Street  
Pittsburgh, PA 15219  
(412) 565-3173  
(412) 565-7620 (fax)  
Email: [DBoard.D4@pacourts.us](mailto:DBoard.D4@pacourts.us)



Disciplinary Counsel  
Cory John Cirelli  
Susan N. Dobbins  
David M. Lame  
Samuel F. Napoli  
Daniel S. White  
LaTammie D. Bivins

OFFICE OF DISCIPLINARY COUNSEL  
[www.padisdisciplinaryboard.org](http://www.padisdisciplinaryboard.org)

March 7, 2022

**PERSONAL AND CONFIDENTIAL**

Nicholas Urick, Esquire  
150 Pleasant Drive, Suite 105  
Aliquippa, PA 15001

Re: Complaint of Michelle Szell  
File No. C4-22-33  
**DB-7 REQUEST FOR STATEMENT OF RESPONDENT'S POSITION**

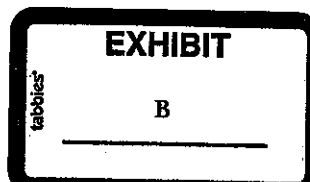
Dear Mr. Urick:

Please be advised that this office has received and is currently considering a complaint against you from Michelle Szell, 135 Fern Hollow Road, #1002, Coraopolis, PA 15108. It is important for you to understand that issuance of this letter means that the complaint against you has survived this office's initial screening process and that, based upon the information currently available to us, it appears that your alleged conduct may have violated the Pennsylvania Rules of Professional Conduct.

It is also important for you to understand that it is the obligation of our office to develop all information relevant to a complaint, including that information, which may justify or exonerate the alleged actions of the respondent-attorney or mitigate the seriousness of any violations that may have occurred. Since this complaint has survived our initial screening process, you should retain or consult with counsel before submitting a statement of your position.

The alleged facts presently under consideration are as follows:

1. On or about September 3, 2020, Michelle Szell retained you to represent her in a divorce action.



2. You required a retainer of \$1,750 from Ms. Szell to begin the representation.
  3. Ms. Szell paid you \$1,750.00.
  4. You had never before represented Ms. Szell.
  5. You did not provide Ms. Szell with any writing setting forth the basis or rate of your fee, either before or within a reasonable period of time after your representation of her in her divorce action commenced.
  6. On September 14, 2020, you filed a Complaint in Divorce in the Court of Common Pleas of Beaver County at docket number 2020-20289 on behalf of Ms. Szell against Jonathan Stickel.
  7. On March 8, 2021, Renee Colbert, Esquire entered her appearance on behalf of Mr. Stickel and filed an Answer, Counterclaim and New Matter on behalf of her client.
  8. You did not reply to the Counterclaim and New matter.
  9. You participated in the sale of the marital home, which occurred in March 2021, on behalf of Ms. Szell.
  10. Following the completion of the sale, you did not have any other communication with Ms. Szell until August of 2021.
  11. By email dated August 16, 2021, you sent Ms. Szell a letter dated August 16, 2021, in which you informed Ms. Szell, *inter alia*, that:
    - (a) You were going to proceed with heading toward litigation;
    - (b) She deserved to have her case moved forward and at this junction, Jonathan and his attorney were slowing this down;
    - (c) You had attempted to resolve this numerous times, as she was aware;
    - (d) She would be scheduled to go to court in the near future and you would need to do preparation for her case in excess of what you anticipated; and,
    - (e) You needed her to replenish her retainer in the amount of \$1,750.
- (A copy of your letter is attached hereto as Exhibit 1)
12. By check dated August 17, 2021, in the amount of \$1,750.00, made payable to you, and annotated "retainer", Ms. Szell paid you the additional fees that you requested from her. (A copy of the negotiated check is attached hereto as Exhibit 2.)

13. You negotiated the \$1,750.00 check that Ms. Szell issued to you.

14. You did not deposit the \$1,750.00 into an IOLTA or escrow account or any other account for the deposit of entrusted funds.

15. On various occasions in September and October 2021, Ms. Szell called and left messages for you to call her with an update on the status of her divorce matter.

16. You did not respond to Ms. Szell's messages.

17. By email dated November 5, 2021, you informed Ms. Szell that you would be taking in a motion the following week in an effort to move {the case} along as fast as possible. (A copy of your email is attached hereto as Exhibit 3.)

18. You did not file a motion or take any other action on behalf of Ms. Szell in her divorce matter.

19. On various occasions in November and December of 2021, Ms. Szell called you and left messages for you to return her call about the status of her divorce matter.

20. You did not respond to any of her inquiries.

21. Ms. Szell also sent you emails in December of 2021 and the beginning of January 2022, but you did not respond to any of her inquiries.

22. On January 6, 2022, Ms. Szell called your office, but your phone number was out of service.

23. By letter dated January 22, 2022, Ms. Szell set forth her concerns with your lack of communication and performance regarding her case, despite her payment of an additional \$1,750 requested by you and addressed the following issues:

(a) She requested an accounting and return of any unearned fees so that she could retain new counsel;

(b) She has asked multiple times for copies of all documents she gave you and other correspondence related to her case; and,

(c) Please respond to this letter within (5) business days.

(A copy of that letter is attached hereto as Exhibit 4.)

24. As of the date of this letter of inquiry, you have not responded to Ms. Szell's letter dated January 22, 2022.

25. You also have not provided an accounting to Ms. Szell nor refunded to her any portion of the funds that she paid you to represent her in her divorce case.

If the above allegations are true, we are concerned that you may have violated the following Rules of Professional Conduct:

1.3, 1.4(a)(3); 1.4(a)(4); 1.5(b); 1.15(b); 1.15(i), 1.16(d), and 3.2.

**The Office of Disciplinary Counsel will make no recommendation for the disposition of this complaint until you have been afforded an opportunity to state your position with respect thereto within thirty (30) days of the date of this letter. Please note that failure to respond to this request for your statement of position without good cause is an independent ground for discipline pursuant to Rule 203(b)(7) of the Pennsylvania Rules of Disciplinary Enforcement. THE OFFICE OF DISCIPLINARY COUNSEL WILL ONLY AGREE TO A LIMITED EXTENSION OF THE THIRTY (30) DAY DEADLINE WHEN THE REQUEST IS MADE FOR SPECIFIC REASONS CONSTITUTING GOOD CAUSE. If you do not respond or provide good cause for failing to respond within thirty (30) days, the Office of Disciplinary Counsel may seek to impose discipline for your violation of Pa.R.D.E. 203(b)(7).**

Please be assured that we are not prejudging the alleged facts and charges nor are we an advocate on behalf of the complainant. Rather, we are conducting an impartial and unbiased investigation with regard to this complaint. In that regard, we will attempt to verify the statements in your answer just as we do with the statements made to us by the complainant. For this reason, and because a lawyer can be subject to discipline for making a materially false statement or deliberately failing to disclose a material fact in connection with a disciplinary matter, you should be careful to be accurate in your factual statements. Additionally, as previously stated, you may wish to consult with counsel before replying to the allegations.

In any reply which you make, please chronologically and specifically state your account of the events and include copies of any particularly pertinent documents to which you refer. Generally, it is most helpful if your response deals item-by-item with the allegations contained in the numbered paragraphs in this letter, as well as with the cited Rules.

Please be advised that §85.13 of the Disciplinary Board Rules requires that any response to this letter:

...that contains an averment of fact not appearing of record or a denial of fact shall include or be accompanied by a verified statement signed by the respondent-attorney that the averment or denial is true based upon knowledge or information and belief. The respondent-attorney need not aver the source of the information or expectation of ability to prove the averment or denial. The verified statement may be based upon personal knowledge as to a part and upon information and belief as to the remainder.

Nicholas Urick, Esquire  
March 7, 2022

Page 5

If we do not hear from you within thirty (30) days, we will assume that you do not desire to submit your position with respect to this complaint and can proceed to make our recommendation for an appropriate disposition on the basis of the information and material contained in our file, including your failure to respond in violation of Rule 203(b)(7), Pa.R.D.E. However, we would certainly prefer to have the benefit of your position before making our recommendation.

Keep in mind that we may provide the complainant with a copy of your statement of position or a summary of it for the express purpose of obtaining a replication, unless you request that the content of your answer, either in total or in part, not be revealed and state reasons therefore which represent good cause. If we do provide the complainant with a copy or summary of your position, we will remind the complainant of the confidentiality of our inquiry.

Please be advised that pursuant to Pa. Disciplinary Board Rule 93.101 this complaint remains confidential.

If you have any questions, you or your counsel should not hesitate to contact this office. Thank you for your anticipated cooperation and assistance in this important matter. We look forward to receiving your response.

Very truly yours,

OFFICE OF DISCIPLINARY COUNSEL

A handwritten signature in black ink, appearing to read "LaTammie D. Bivins".

LaTammie D. Bivins  
Disciplinary Counsel

LDB/dg

Enclosures

PERSONAL SERVICE

NICHOLAS URICK, LLC  
ATTORNEY AT LAW

150 PLEASANT DRIVE, SUITE 105  
ALIQUIPPA, PA 15001

EMAIL: [nurick@uricklaw.com](mailto:nurick@uricklaw.com)

PHONE: (724) 203-3110

FAX: (724) 203-3112

August 16, 2021

Ms. Michelle Szell  
230 Coraopolis Rd., #200  
Coraopolis PA 15108

*(via email only)*

**RE: Divorce**


Dear Michelle:

As you know we are going to proceed with heading towards litigation. You deserve to have your case moved forward and at this juncture Jonathan and his attorney are slowing this down. I have attempted to resolve this numerous times as you are aware.

In any event, we will be scheduled to go to Court in the near future and I will need to do preparation for your case in excess of what we anticipated. With that being said, I have tried to keep your cost low in handling this divorce matter, but in furtherance of your case I kindly request your retainer be replenished in the amount of \$1,750.00. As I mentioned, I have been as equitable as possible, and will consider making a claim for counsel fees in your divorce to hopefully recoup some of the cost you have had due to his lack of diligence.

Please let me know when you will be able to make the arrangements and we can set up a time to meet. Thank you in advance.

Very truly yours,



Nicholas Urick, Esq.



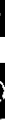


**6265**

150-17223-9

**Back to**

**PAY TO THE  
ORDER OF**

PAY TO THE ORDER OF Attorney Nicholas Urlik \$ 1,750.00  
One Thousand Seven Hundred Fifty DOLLARS 



# Stars and Stripes Forever

**CLEARVIEW.**  
FEDERAL CREDIT UNION

# ONE

464-23

0504992005 21252380372:1

5295  
*[Signature]*

**EXHIBIT**

2

**Labels**

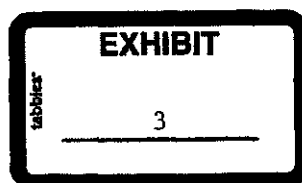


**From:** Nicholas Urick  
**To:** Michelle Szell  
**Subject:** Divorce  
**Date:** Friday, November 05, 2021 4:06:12 PM

---

I'll be taking in a motion next week to get a court date so we'll be moving along as fast as possible. Thanks. Hope all is well

Nicholas Urick, Esq.  
150 Pleasant Drive, Suite 105  
Aliquippa, Pa 15001  
(724) 203-3110 office  
(724) 203-3112 fax



VIA EMAIL,US MAIL AND CERTIFIED MAIL

Ms. Michelle Szell  
135 Fern Hollow Road Apt 1002  
Coraopolis, PA 15108

January 22, 2022

Mr. Nicholas Urick  
150 Pleasant Drive, Suite 105  
Aliquippa, PA 15001

Dear Mr. Urick,

I am writing this letter to bring to your attention that you have not responded to any contact I have taken to reach you in regards to my divorce case. After a payment of \$1,750.00 on August 17, 2021 of which was provided to continue my case, you told me on 11/5/2021 that you would take a motion to get a court date within the next week. It has now been two months and the motion has not been filed nor has there been any update on my divorce case for a court date or so forth. Because of this delay in the progress of my case, my health, wellness, and finances have been affected.

I would also like to mention that I have not been able to get in touch with you for the past two months to discuss moving forward with my case. Therefore, I would like an account of what expenses have been accrued and and the remaining portion of the money returned back to me so that I may seek further counsel.

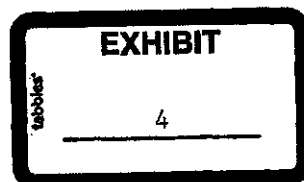
I require you to make this situation right by returning the payment on August 17, 2021 of \$1750.00 along with all the paperwork that was given to you about my case. I have asked multiple times for copies of all documents I gave you and other correspondence related to my case.

Please respond to this letter within (5) business days. I can be reached at 412-576-3414, email MichelleS@birdandbearsvcs.com and the address listed above.

Sincerely,

*Michelle Szell*

Michelle Szell



**CERTIFICATE OF COMPLIANCE**

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: LaTammie D. Bivins

Signature: 

Name: LaTammie D. Bivins

Attorney No. (if applicable): 79599