IN THE SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL, : No. 2973 Disciplinary Docket No. 3

:

Petitioner

No. 65 DB 2023

٧.

Attorney Registration No. 312448

JONATHAN WARREN CHASE,

:

Respondent : (Philadelphia)

<u>ORDER</u>

PER CURIAM

AND NOW, this 15th day of May, 2023, upon consideration of the Recommendation of the Three-Member Panel of the Disciplinary Board, the Joint Petition in Support of Discipline on Consent is granted, and Jonathan Warren Chase is suspended on consent from the Bar of this Commonwealth for a period of one year. Respondent shall comply with the provisions of Pa.R.D.E. 217 and pay costs to the Disciplinary Board. See Pa.R.D.E. 208(g).

A True Copy Nicole Traini As Of 05/15/2023

Chief Clerk
Supreme Court of Pennsylvania

BEFORE THE DISCIPLINARY BOARD OF THE SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL, :

Petitioner

: ODC File No. C1-21-803

v.

: Atty. Reg. No. 312448

JONATHAN WARREN CHASE,

Respondent : (Philadelphia County)

JOINT PETITION IN SUPPORT OF DISCIPLINE ON CONSENT PURSUANT TO Pa.R.D.E. 215(d)

Petitioner, the Office of Disciplinary Counsel ("ODC"), by Thomas J. Farrell, Chief Disciplinary Counsel and Michael D. Gottsch, Disciplinary Counsel, and Respondent, Jonathan Warren Chase, Esquire ("Respondent"), respectfully petition the Disciplinary Board in support of discipline on consent, pursuant to Pennsylvania Rule of Disciplinary Enforcement ("Pa.R.D.E.") 215(d), and in support thereof state:

PARTIES TO DISCIPLINE ON CONSENT

1. Pursuant to Pa.R.D.E. 207, ODC, whose principal office is situated at Office of Chief Disciplinary Counsel, Pennsylvania Judicial Center, Suite 2700, 601 Commonwealth Avenue, P.O. Box 62485, Harrisburg, Pennsylvania, 17106, is invested with the power and 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

FILED

04/11/2023

The Disciplinary Board of the Supreme Court of Pennsylvania

in accordance with the provisions of the Enforcement Rules.

- 2. Respondent was born on January 27, 1985, is currently 38 years old, and was admitted to the Bar of the Commonwealth of Pennsylvania on October 25, 2011. Respondent is on active status in Pennsylvania, and his last registered address is 1515 Market Street, Suite 1200, Philadelphia, PA 19102.
- 3. Respondent is subject to the disciplinary jurisdiction of the Disciplinary Board of the Supreme Court.
 - 4. Respondent has no prior record of discipline.

SPECIFIC FACTUAL ALLEGATIONS ADMITTED

- 5. Respondent's affidavit stating, inter alia, his consent to the recommended discipline is attached as Exhibit A.
- 6. Keith Regan retained the law firm of Kraemer, Manes & Associates LLC ("the Kraemer firm") to represent him with respect to claims under, inter alia, the Americans With Disabilities Act, against Temple University, his former employer.
- 7. Regan entered into a contingent fee agreement with the Kraemer firm and Respondent was the lawyer at that firm who was assigned to handle Regan's case.
- 8. On August 19, 2019, Respondent filed a complaint in the United States District Court for the Eastern District of Pennsylvania asserting claims under the Americans With

Disabilities Act on behalf of Regan. The complaint was styled Regan v. Temple University, No. 2:19-cv-03742.

- 9. Subsequently, the Kraemer firm evolved into a firm named Ruppert Manes Narahari LLC ("the Ruppert Manes firm"). In March 2020, Respondent left the Ruppert Manes firm and started his own law practice, taking Regan's case with him.
- 10. By email to Regan dated May 21, 2020, Respondent informed him that a tentative trial date of June 2021 had been set and stated that "[b]etween now and then, we will continue with the discovery process."
- 11. Although Respondent had served interrogatories and requests for production of documents to which Temple University responded in December 2019, Respondent did not serve further discovery. Nor did he take any depositions in the case.
- 12. On or about February 11, 2021, Temple University filed a Motion for Summary Judgment against Regan ("Motion").
- 13. By email to Regan dated February 26, 2021, Respondent informed him of the Motion and suggested that Respondent and he "can get together for a call to talk things over early next week."

 Over the next several days Respondent and Regan exchanged emails and agreed to speak on Wednesday, March 3, 2021.
- 14. On March 2, 2021, without Regan's knowledge or consent, Respondent signed and filed a Joint Stipulation and Order of

Dismissal with Prejudice ("Stipulation of Dismissal" or "Stipulation"). The Stipulation provides that "the Parties hereby jointly stipulate, through their respective counsel, to dismiss this matter with prejudice ...," thus impliedly misrepresenting to the court that Respondent had Regan's authorization to stipulate to the dismissal.

- 15. That same day, Magistrate Judge Timothy Rice signed the Stipulation, ordering that the case be dismissed with prejudice.
- 16. Prior to filing the Stipulation of Dismissal, Respondent did not discuss with Regan the prospect or advisability of dismissing Regan's case.
- 17. After Respondent had filed the Stipulation and the case had been dismissed, Respondent did not inform Regan of these events.
- 18. Following the dismissal of Regan's case, of which Regan remained unaware, Respondent proceeded, for nearly six months, in emails and phone calls, to make false statements to Regan, misleading Regan to believe that his case was progressing and that Respondent would be seeking additional discovery and responding to Temple University's motion for summary judgment.
- 19. On March 4, 2021, Respondent spoke with Regan and discussed responding to the Motion, but Respondent failed to inform

Regan that he had filed the Stipulation and that based on the Stipulation the court had dismissed his case.

20. On the same day, following the call, Regan emailed Respondent asking:

I'm wondering if we can access the transcript from [my] unemployment hearing? I believe they incriminated themselves and that I had heard from the initial partner I spoke with at your old firm that we may be able to use what they said in the unemployment hearing against them possibly for this case? ... I feel like we have a good amount of evidence to counter their arguments.

- 21. Respondent never obtained the transcript of the unemployment hearing.
- 22. Regan spent significant amounts of time collecting information and providing input to assist Respondent in preparing the response to the Motion.
- 23. By email to Respondent dated March 8, 2021, Regan asked whether he could "take a look at a copy of their motion?" Respondent replied, "Sure. I will send you a copy of their motion. Let me know when you are available to chat later this week and we can schedule a call."
- 24. By emails to Respondent dated March 14 and March 16, 2021, Regan asked what the deadline was for responding to the Motion. In his March 16, 2021 reply email, Respondent falsely told Regan that "I have a couple more weeks to get the response

- in." Regan then replied, "I think we should also get a copy of the unemployment hearing transcript because I think they may have incriminated themselves."
- 25. By email to Respondent dated March 28, 2021, Regan requested information about the Court deadline to respond to the Motion. When Respondent failed to respond, Regan sent Respondent three follow-up emails between April 5, 2021, and April 7, 2021, requesting a response to his inquiry.
- 26. On April 8, 2021, Regan sent Respondent a final follow-up email stating, "I'm concerned that you have become unresponsive. Please do not file any response to the motion for summary judgment on my behalf at this time until we can speak."
- 27. By reply email on the same date, Respondent falsely informed Regan that "I have asked the court for an extension of time to file a response and it will most likely be granted."
- 28. Regan again emailed Respondent on May 6, 2021 and May 11, 2021, asking whether the Court had set a deadline for the response to the Motion. Respondent replied, falsely: "[w]e have until 5/28."
- 29. By email dated May 26, 2021, Regan asked Respondent whether, if Respondent couldn't get more time, Respondent would be able to submit the response to the Motion by May 28, 2021.

Respondent replied on May 27, 2021, falsely telling Regan "Yes, I should be good to go."

- 30. By email to Respondent dated May 29, 2021, Regain requested an update on whether the Court accepted the extension request before the "May 28, 2021 deadline". When Respondent failed to respond, Regan followed up with additional emails to Respondent on June 2, 2021 and June 3, 2021, again asking whether the extension had been granted. Respondent replied on June 4, 2021, falsely telling Regan that the Court had granted an extension through June 18, 2021.
- 31. On or about June 15, 2021, Respondent spoke with Regan and discussed the response to the Motion.
- 32. By email to Respondent dated August 4, 2021, Regan requested a copy of the response to the Motion. When Respondent failed to respond to his request, Regan emailed Respondent three times between August 9, 2021, and August 20, 2021, each time again requesting a copy of the response to the Motion.
- 33. By email to Regan dated August 23, 2021, Respondent told him that Respondent had been away on vacation with limited access to email because of a poor signal. Respondent replied, "Please bear with me for a few days. I will circle back with you once I have had the chance to sort through everything that got backed up during my absence."

- 34. By email to Respondent dated August 30, 2021, Regan stated, "Sorry if I seem aggravated it just seemed communication between us has not been efficient since Temple filed their motion and I was concerned . . ." Within one week of sending that email, Regan learned that Respondent had agreed to dismiss his case without his knowledge or consent and that Respondent had misled him.
- 35. On September 7, 2021, Regan emailed Respondent, stating, "It's been brought to my attention that you had the case dismissed without my permission on 3/2/21 . . . and that you have been intentionally misleading me as outlined in the email thread."
- 36. The following day, September 8, 2021, Respondent replied, asking whether he could call Regan on September 9, 2021 at 9:30 a.m., and telling him "I'll explain everything then."
- 37. When Respondent spoke to Regan and addressed why Respondent had filed the Stipulation dismissing his case, Respondent told him that Respondent was worried that Regan would lose the case and possibly be liable for fees or costs, but Respondent offered no reason why he had not consulted Regan about dismissing his case. Respondent stated, "sorry, I apologize."
- 38. Respondent added that to compensate Regan, "down the road" Respondent would give him free legal advice.

- 39. On December 21, 2021, based upon a motion filed on Regan's behalf by another lawyer, the court vacated the Stipulation and Order of dismissal due to Respondent's having filed the Stipulation without Regan's knowledge or consent. Following the vacating of the Stipulation and Order of Dismissal, the new lawyer for Regan filed a Response to the Motion for Summary Judgment on Regan's behalf and the Motion for Summary Judgment was thereafter granted against Regan.
- 40. Respondent now accepts full responsibility for his misconduct, as described above.
- 41. If this matter were to proceed to a hearing, Respondent would testify that he believed he was protecting Regan by dismissing Regan's case without his knowledge, because Respondent did not want to see Regan become liable for Temple's attorney's fees and costs under the fee-shifting statutory provisions available to the prevailing party in the case. Respondent would further testify that, however misguided he may have been, he misled Regan about the case because he felt trapped and did not know how to advise Regan to dismiss the case, as Regan might not have agreed to the dismissal. After Respondent had dismissed the case, he didn't know how to inform Regan of that fact since Regan wanted to oppose Temple's motion for summary judgment. Respondent regrets his behavior and recognizes that it was unethical.

42. Respondent fully understands that he should have obtained Regan's express consent before terminating his lawsuit and is remorseful that he did not do so. Respondent also understands that he should not have made false representations to his client concerning the status of the case, and he is remorseful that he did so. Respondent understands that his actions caused harm to the public's trust and perception of the legal profession.

VIOLATIONS OF THE RULES OF PROFESSIONAL CONDUCT

- 43. By his conduct as set forth in paragraphs 6 through 42 above, Respondent acknowledges he violated the following Rules of Professional Conduct:
 - a. RPC 1.1, which provides: "A lawyer shall provide competent representation to a client. Competent representation requires the legal knowledge, skill, thoroughness and preparation reasonably necessary for the representation."
 - b. RPC 1.2(a), which provides in pertinent part: "[A] lawyer shall abide by a client's decisions concerning the objectives of representation and, as required by Rule 1.4, shall consult with the client as to the means by which they are to be pursued. A lawyer may take such action on behalf of the client

- as is impliedly authorized to carry out the representation."
- c. RPC 1.3, which provides that "A lawyer shall act with reasonable diligence and promptness in representing a client."
- d. RPC 1.4(a), which provides that "A lawyer shall:
 - (1) promptly inform the client of any decision or circumstance with respect to which the client's informed consent, as defined in Rule 1.0(e), is required by these Rules;
 - (2) reasonably consult with the client about the means by which the client's objectives are to be accomplished;
 - (3) keep the client reasonably informed about the status of the matter;
 - (4) promptly comply with reasonable requests for information."
- e. RPC 1.4(b), which provides that "A lawyer shall explain a matter to the extent reasonably necessary to permit the client to make informed decisions regarding the representation."
- f. RPC 3.3(a)(1), which provides that a lawyer shall not knowingly "make a false statement of material

- fact or law to a tribunal or fail to correct a false statement of material fact or law previously made to the tribunal by the lawyer[.]"
- g. RPC 4.1(a), which provides that "In the course of representing a client a lawyer shall not knowingly make a false statement of material fact or law to a third person."
- h. RPC 8.4(c), which provides that it is professional misconduct for a lawyer to engage in conduct involving dishonesty, fraud, deceit or misrepresentation.
- i. RPC 8.4(d), which provides that it is professional misconduct for a lawyer to engage in conduct that is prejudicial to the administration of justice.

JOINT RECOMMENDATION FOR DISCIPLINE

- 44. Petitioner and Respondent jointly recommend that the appropriate discipline for Respondent's misconduct is a one-year suspension.
- 45. Respondent hereby consents to the discipline being imposed upon him by the Disciplinary Board of the Supreme Court of Pennsylvania. Attached to this Petition as Exhibit A is Respondent's executed Affidavit as required by Pa.R.D.E. 215(d)(1) through (4).

- 46. In support of the Joint Petition, the parties respectfully submit that the following mitigating circumstances are present:
 - a. Respondent accepts full responsibility for his misconduct and is remorseful;
 - b. Respondent has cooperated with Disciplinary Counsel in jointly agreeing to discipline on consent;
 - c. Respondent understands discipline is necessary and appropriate, and has expressed a willingness to accept discipline in the form of a one-year suspension; and
 - d. Respondent has no history of discipline in 11 years of practice.
 - e. Respondent did not receive undue pecuniary gain to the detriment of his client as a result of his conduct;
 - f. Regan's case (the judgment based on the Dismissal filed by Respondent) was ultimately opened, a Response to the Motion for Summary Judgment was filed, and the Motion was subsequently adjudicated against Regan.
 - g. Respondent ultimately acknowledged his wrongdoing to his client Regan and apologized to him for his actions.
- 47. In Pennsylvania, there is no per se discipline for a particular type of misconduct; instead, each case is reviewed individually while being mindful of precedent and the need for

consistency. Office of Disciplinary Counsel v. Lucarini, 472 A.2d 186, 190 (Pa. 1983).

- 48. The parties believe, and therefore aver, that their recommendation for a one-year suspension is consistent with other matters involving making false statements to courts, and false statements to clients to cover up wrongdoing, specifically:
- Office of Disciplinary Counsel v. Angela E.M. Montgomery-Budd, No. 29 DB 2021 (S.Ct. Order 4/9/2021) (Joint Petition in Support of Discipline on Consent 3/8/2021). respondent consented to a one-year suspension. She had undertaken to represent clients in an adoption proceeding but neglected to move the matter forward for fourteen months, along the way misrepresenting the status of the matter to the clients, misleading them into believing that she was actively pursuing the She repeatedly claimed to have filed adoption petitions with the court, telling the clients she was waiting for the court to set a hearing date, when in fact she had not filed any adoption petitions. When the respondent eventually filed a petition for termination of parental rights and a petition for adoption, she submitted accompanying verifications bearing signatures of her clients that she knew or should have known were forged. When the respondent's misconduct came to light and ODC sent her a DB-7 letter, she admitted the facts alleged in the letter, accepted

responsibility for her misconduct, and expressed remorse for her behavior. She admitted that she should have been honest with her clients but stated that she was embarrassed. In mitigation, the respondent's misconduct did not cause her clients to lose legal rights or to be deprived of a remedy, she refunded her attorney's fee in full, and she had no history of discipline in 21 years of law practice.

Office of Disciplinary Counsel v. Daniel Michael b. Dixon, No. 174 DB 2020 (D.Bd. Rpt. 12/8/2021) (S.Ct. Order 3/4/2022). Following a disciplinary hearing, the respondent, who had no prior discipline, was suspended for one year and one day for his misconduct in neglecting to timely file an appeal of a tax assessment on behalf of a corporate client, then concealing neglect for a year by making numerous, continuing client, misrepresentations the making multiple to. misrepresentations to others, and filing two false affidavits with the Board of Finance and Revenue. The Board noted that Dixon his acknowledged dishonest conduct and expressed contrition, and also that he did not try to excuse his actions but explained that he feared he would be fired from his employment over his neglect. Bd. Rpt. at 36. The Board concluded that "[Dixon]'s serious misconduct requires his removal from the practice of law and a reinstatement process to determine his

fitness to resume practice at a future date. Imposition of this discipline will ensure that the integrity of the courts is preserved while protecting the public and deterring future misconduct of a similar nature." Id. at 43.

- Office of Disciplinary Counsel v. Jamie Ray-Leonetti, No. 182 DB 2017 (S.Ct. Order 3/19/2018). The Court granted a Joint Petition in Support of Discipline on Consent and suspended the respondent for one year and one day based on the respondent's neglect and repeated misrepresentations to clients and third parties regarding a case. The respondent failed to file a complaint in a lawsuit, misrepresented to her clients that an arbitration hearing was postponed, failed to appear with her clients at the arbitration, misrepresented to them that the case had settled (and eventually admitted that it had not settled), failed to advise her clients that the case had in fact been dismissed, and sent emails to third parties containing The respondent had had one prior private misrepresentations. reprimand (with one year probation) for similar misconduct. mitigation, the respondent expressed remorse, cooperated with Disciplinary Counsel, and demonstrated Braun evidence.
- d. In re Anonymous (Eric Solomon), No. 58 DB 1995 (D.Bd. Rpt. 7/2/1996) (S.Ct. Order 9/9/1996). Following a disciplinary hearing, the respondent was suspended for one year

where, unbeknownst to his client, the respondent accepted a settlement offer of \$21,500 that the client had specifically rejected. The respondent kept this a secret from the client and delayed informing the client while attempting to settle a different client's case, hoping to use his fee from that case to fund a larger settlement for the first client. The respondent subsequently falsely informed the client (and Disciplinary Counsel) that he had settled the client's case for \$150,000-the amount the client had demanded. When the respondent's misconduct was discovered, he admitted his wrongdoing and cooperated with Disciplinary Counsel. He stated that he had accepted the \$21,500 settlement offer in spite of the client's rejection of the offer, because his senior partner demanded that he either convince the client to accept the offer or get fired. The respondent had received two prior informal admonitions, neither involving dishonesty. He expressed remorse. The Disciplinary Board noted that Respondent's misconduct was limited to one client matter. The Board characterized the respondent's conduct as "aberrational" and recommended a public censure, but the Supreme Court suspended him for a year.

49. Like Respondent in the instant matter, Ms. Montgomery-Budd, discussed above, had no record of discipline. Similar to Respondent, she misled her clients with false statements as to the

progress of the proceeding. While Respondent did not file any forged documents with the court as did Montgomery-Budd, he filed a Stipulation of Dismissal with Prejudice that he knew his client was unaware of and had not authorized. *Montgomery-Budd* supports the appropriateness of a one-year suspension on consent for Respondent.

- 50. Both Ray-Leonetti and Solomon, above, had prior records of discipline that were factored into their discipline of one year and one day, whereas Respondent has no record of discipline.
- 51. Dixon, like Respondent, had no record of discipline when he was suspended for one year and one day. And while the two matters are similar, the respondent in **Dixon**, in addition to misleading his client for a year, not only filed two false affidavits in court, adding to his transgressions of the rules, but also did not consent to discipline as Respondent is doing; Dixon was disciplined only after a full disciplinary hearing.
- 52. The parties respectfully suggest that Respondent's lack of prior discipline, admission of wrongdoing, expression of remorse, and cooperation with Disciplinary Counsel in consenting to discipline make a one-year suspension the appropriate discipline for Respondent.
- 53. Based on the totality of the circumstances presented as more fully described and set forth above, the parties submit that

discipline in the form of a one-year suspension will adequately address Respondent's misconduct and allow for him to reflect upon his behavior and maintain the integrity of the legal profession, while also taking into consideration Respondent's mitigating factors.

WHEREFORE, Petitioner and Respondent respectfully request, pursuant to Pennsylvania Rules of Disciplinary Enforcement 215(e), 215(g), and 215(i), that a three-member panel of the Disciplinary Board review and approve the Joint Petition in Support of Discipline on Consent and file a recommendation with the Supreme Court of Pennsylvania that Respondent receive a one-year suspension on consent.

Respectfully submitted,

Michael W Lottse

OFFICE OF DISCIPLINARY COUNSEL THOMAS J. FARRELL Attorney Registration Number 48976 Chief Disciplinary Counsel

4/11/23

DATE

Michael D. Gottsch Disciplinary Counsel

Attorney Registration Number 39421 Office of Disciplinary Counsel District I Office

1601 Market Street Philadelphia, PA 19103 (215) 560-6296

4/6/2023

DATE

Steven N. Cherry, Esquire - Affirms to Respondent
Mintzer Sarowitz Zeris Ledva & Meyers, LIP
1500 Market St. Ste. 4100
Philadelphia, Pennsylvania 19102-2128
(215) 735-7200

No. 74114

(215) 735-7200

Jonathan Warren Chase, Esquire

Respondent

Attorney Registration Number 312448

VERIFICATION

The statements contained in the foregoing Joint Petition In Support of Discipline on Consent 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.A. §4904, relating to unsworn falsification to authorities.

| 4/ | 11 | / | 2 | 3 | |
|------|----|---|---|---|--|
| DATE | | | | | |

Michael D. Gottsch, Esquire Disciplinary Counsel

4/6/2023

DATE

Jonathan Warren Chase, Esquire Respondent

EXHIBIT A

BEFORE THE DISCIPLINARY BOARD OF THE SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL, :

Petitioner

: ODC File No. C1-21-803

v.

: Atty. Reg. No. 312448

JONATHAN WARREN CHASE,

Respondent : (Philadelphia County)

AFFIDAVIT UNDER RULE 215(d), Pa.R.D.E.

Jonathan Warren Chase, being duly sworn according to law, deposes and submits this affidavit consenting to the recommendation of a one-year suspension in conformity with Pa.R.D.E. 215(d), and further states as follows:

- 1. He is an attorney admitted to the Bar of the Commonwealth of Pennsylvania on or about October 25, 2011.
- 2. He desires to submit a Joint Petition in Support of Discipline on Consent pursuant to Pa.R.D.E. 215(d).
- 3. His consent 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 affidavit.
- 4. He is aware that there is presently pending a proceeding regarding allegations that he has been guilty of misconduct as set forth in the Joint Petition in Support of Discipline on Consent Pursuant to Pa.R.D.E. 215(d) to which this affidavit is attached.
 - 5. He acknowledges that the material facts set forth in the

Joint Petition are true.

- 6. He submits this affidavit because he knows that if charges predicated upon the matter under investigation were filed, or continued to be prosecuted in the pending proceeding, he could not successfully defend against them.
- 7. He acknowledges that he is fully aware of his right to consult and employ counsel to represent him in the instant proceeding. He has retained, consulted, and acted upon the advice of Steven N. Cherry, Esquire in connection with his decision to execute the Joint Petition.

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

| Signed this 6th day of April | , 2023. |
|---------------------------------------|---|
| Jonathan Warren Ch | ase. Esquire |
| | abe, boquite |
| Before me on this day of April , 2023 | Commonwealth of Pennsylvania-Notary Seal John G Flanagan, Notery Public Bucks County My Commission Expires November 19, 2023 |
| Notary Public | Commission Number 1051004 |

BEFORE THE DISCIPLINARY BOARD OF THE SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL, :

Petitioner :

: ODC File No. C1-21-803

: Atty. Reg. No. 312448

v.

JONATHAN WARREN CHASE,

Respondent : (Philadelphia County)

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving the foregoing document upon all parties of record in this proceeding in accordance with the requirements of 204 Pa. Code §89.22 (relating to service by a participant).

First Class Mail and Email, as follows:

Steven N. Cherry, Esquire Mintzer Sarowitz Zeris Ledva & Meyers, LLP 1500 Market St. Ste. 4100 Philadelphia, Pennsylvania 19102-2128 scherry@defensecounsel.com

Dated: 4/11/23

Michael D. Gottsch Disciplinary Counsel

Office of Disciplinary Counsel

District I Office 1601 Market Street Philadelphia, PA 19103 (215) 560-6296