

3.

The Attorney/Client relationship between Mr. Weightman and the office of GRABILL & SEELYE, P.L.L.C. has degraded to the point that Counsel believes that there is no longer a functioning Attorney/Client relationship.

4.

Mr. Weightman has failed to comply with the terms of the engagement letter regarding payment of outstanding legal fees.

5.

Mr. Weightman has left two threatening voicemails on the Your Petitioner's voicemail since he began representing him.

6.

Mr. Weightman has also caused a scene in Your Petitioner's office, screaming so loud that Attorney Grabill believed that Mr. Weightman was assaulting our Petitioner.

7.

Mr. Weightman's conduct disrupted the entire office, including other clients.

8.

The last time that Mr. Weightman answered a phone call from Your Petitioner was on Monday, February 13, 2017.

9.

During that phone contact, Mr. Weightman refused to speak to Your Petitioner; however, Mr. Weightman believed he had hung up the phone and was heard by Your Petitioner telling an unknown third party that he intended to "punch [Your Petitioner] in the face;" to

“knock [Your Petitioner] on his fat-ass;” and that he “did not care what [Your Petitioner] had to say.

10.

Prior to that phone conference, Mr. Weightman refused to answer any phone contact from Your Petitioner and to return any messages from February 6, 2017 until February 13, 2017.

11.

Since that phone conference on February 13, 2017, Mr. Weightman will not answer or return any phone contact from Your Petitioner.

12.

Your Petitioner has also sent him several pieces of correspondence regarding the importance of this matter and of finalizing the Agreement reached between the Parties and placed on the record on January, 6, 2017.

13.

That counsel for the Defendant, Margaret Morris, Esquire, does not object to the motion to withdrawal as counsel.

14.

The Plaintiff continues to engage in above-described conduct that interferes with Counsel’s ability to represent him.

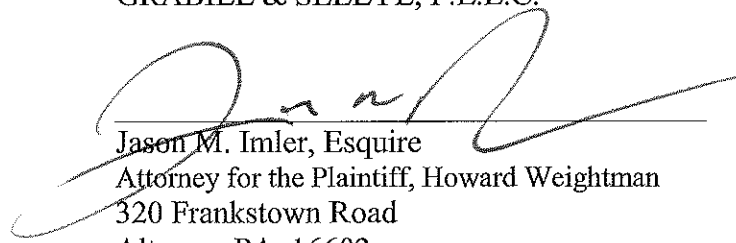
15.

Based upon the above-described conduct, Your Petitioner believes that no Attorney/Client relationship can continue to exist.

WHEREFORE, your Petitioner, JASON M. IMLER, ESQUIRE, GRABILL & SEELYE, P.L.L.C., respectfully requests this Honorable Court to enter an Order permitting the withdrawal of Jason M. Imler, of Grabill & Seelye, P.L.L.C., as counsel of record in the above referenced matter.

Respectfully submitted,

GRABILL & SEELYE, P.L.L.C.

A handwritten signature in black ink, appearing to read "J. Imler", is written over a horizontal line. The signature is fluid and cursive.

Jason M. Imler, Esquire
Attorney for the Plaintiff, Howard Weightman
320 Frankstown Road
Altoona, PA 16602
(814) 944-5090
PA I.D. #: 208540

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Howard E. Weightman

:
:
:
:
:
:
:

C-2016-2565520

v.

Pennsylvania Electric Company

CERTIFICATE OF SERVICE

I hereby certify that this 22nd day of February, 2017, that I served a copy of the Petition to Withdraw as Counsel upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via Fax

The Honorable Mary D. Long
Administrative Law Judge
Pennsylvania Public Utility Commission
Piatt Place
Suite 220
301 5th Avenue
Pittsburgh, PA 15222

Via Email

Margaret Morris, Esquire
REGER, RIZZO, DARNALL, LLP
Cira Centre, 13th Floor
2929 Arch Street
Philadelphia, PA 19104

GRABILL & SEELYE, P.L.L.C.

BY: 

Jason M. Imler, Esquire
PA I.D. #208540
Attorney for Defendant, Howard Weightman
320 Frankstown Road
Altoona, PA 16602
(814) 944-5090
jason@grabillandseelye.com