

BEFORE THE
SUPREME COURT OF TEXAS
BOARD OF DISCIPLINARY APPEALS

FILED
By: _____
MAR 09 2012
Board of Disciplinary Appeals appointed by the Supreme Court of Texas

COMMISSION FOR LAWYER DISCIPLINE, §
Petitioner §

V. §
PAIGE HORELICA, §
STATE BAR NUMBER 24010112 §
Respondent §

CASE NO. 46203 46280

PETITION FOR REINSTATEMENT AFTER DISABILITY SUSPENSION

COMES NOW, Paige Horelica (hereinafter "Horelica" or "Respondent"), and files this Petition for Reinstatement after Disability Suspension and would respectfully show this Board as follows:

I.
PARTIES

Respondent is a 39 year old woman, Paige Horelica, currently residing at 22126 Legendre Road, Richmond, Texas 77407.

Petitioner, The Commission For Lawyer Discipline, is an administrative agency of the State Bar of Texas and can be served with process via certified mail return receipt requested pursuant to Texas R. Disciplinary Procedure 11.04 to Linda Acevedo, Chief Disciplinary Counsel, The Chief Disciplinary Counsel's Office, 1414 Colorado Street, Austin, TX 78701. A copy of the petition is also served via certified mail return receipt requested to Assistant Disciplinary Counsel, Timothy R. Bersch, Suite 1000, 600 Jefferson, Houston, Texas 77002.

II.
JURISDICTION AND VENUE

This motion is brought pursuant to Tex. R. Discpl. Proc. 12.06: Reinstatement After Disability. Respondent resides in Fort Bend County; therefore, and agrees and stipulates that venue and jurisdiction are proper in Harris County before the Commission.

III. BACKGROUND

On March 9, 2010, it was concluded that Respondent was suffering from a disability as defined by Rule 1.06-I of the Texas Rules of Disciplinary Procedure (TRCP). Respondent agreed with the decision made by the Commission for Lawyer Discipline ("Commission") and executed a stipulation which supported that finding (See Attached Exhibit A). At that time, Respondent was suspended from the practice of law in Texas and was prohibited from practicing law in Texas in any representative capacity. Respondent was also ordered to notify each of her clients in writing of the suspension and to file an affidavit stating so within thirty days. She was ordered to return all monies, files, papers, and other property belonging to former clients. Respondent was to surrender her Texas law license and permanent State Bar Card to the Office of Chief Disciplinary Counsel. Respondent performed all the tasks as requested by the Commission.

A. Respondent's Current Condition

During this suspension, Respondent has taken the necessary time to take care of her disability issues. In May 2010, Respondent was referred to Paula Haymond, Ed.D. by the Department of Assistive and Rehabilitative Services (DARS) following a traumatic brain injury. This brain injury caused multiple issues affecting Respondent, including depression and physical debilitation. According to an affidavit by Respondent's psychologist and health care provider, Dr. Haymond, Respondent has fully

recovered from her depression, physical infirmities, and is able to be a benefit to the legal field (See Exhibit B). Respondent has also worked with a neurologist to insure that she is ready to go back into the legal field with a clear mind. His affidavit will be furnished.

Dr. Haymond's affidavit shows and provides that a "mental health care provider as to the Respondent's current condition" should be considered. Dr. Haymond is a mental health care provider whose practice consists of counseling for those who suffer traumatic brain injury as with the case of the Respondent. Dr. Haymond first saw Horelica in May 2010 for brain damage and major depression. Several sessions followed as detailed in the health care provider's affidavit. A course of treatment was prescribed that included: "97532 Development of cognitive skills to improve attention, memory, problem solving (including compensatory training), and direct (one on one) patient contact."

Dr. Haymond's services and course of treatment for mental health care improvement for the Respondent were approved. The Texas Department of Assistive and Rehabilitation Services (DARS) in June of 2010 approved 144 units of one on one direct training sessions. Horelica attended all these sessions, and did weekly homework assignments. It is interesting to note that early in this rehabilitative process Horelica's legal and ethical obligations became part of her treatment. As Dr. Haymond explained: "Within several sessions the focus of training move to the more practical application of skill recovery to sorting out Paige's legal obligations, client grievances, and seeking reinstatement of her license to practice law in the State of Texas. To those ends, work began in sorting out the papers from her practice which was hastily close in 2008 including the four cases which resulted in grievances filed against her for failure to meet her obligations as a representative attorney. "

It is clear from Health Care Provider Dr. Haymond that the Respondent has made major strides in her recovery of her cognitive skills, and her issues with depression have lifted. Dr. Haymond has referenced in the attached affidavit how she has found support and understanding from her pastor, Dr. Johnny Teague (see Exhibit C), and others, including Attorney Derick Smith (see Exhibit D), Attorney Lewis K. Harley (see Exhibit E), Sienna Home Health Care Administrator and Masters Prepared Nurse Jan Walston (see Exhibit F), Doug Bietz, B&W Consulting Services (see Exhibit G), Albert Horelica (see Exhibit H), Rev. Eddie Carter (see Exhibit I), Francis Miles (see Exhibit J), John Wallace and Michelle Ashton (see Exhibit K). Dr. Haymond recognized that the Respondent has tried to make amends for her past mistakes and is currently seeking to make whole all those she wronged. It is noted that the Respondent has given numerous hours performing community service for others, in a variety of ways.

In 2012, Dr. Haymond has seen Horelica several times and states that the Respondent appears to be symptom free of depression and has made improvements in all other areas of her life as well. Dr. Haymond recommends that Horelica be allowed to be reinstated as an attorney.

B. Activities Since Suspension.

1. Affidavit of Jan Walston

Administrator Walston is the mother of the Respondent. She is aware of the difficulties that the head trauma and depression caused. She knew that her daughter lost her law license. She also observed that over time with the help of weekly therapy sessions with Dr. Haymond, weekly depression support groups, and working at a health care company remarkable progress has been made. Walston has observed that Horelica commenced

taking care of her financial obligations. Mother and daughter work at the same company where Horelica has Human Resources duties and is the Staff Coordinator. Once she completed her cognitive skills therapy and weekly counseling with her health care provider, her duties increased to include Case Management according to Walston's affidavit. At the present time, Mrs. Walston observes how Horelica functions: "All three areas – Human Resources, Staffing, and Case Management – require extensive attention to detail, concentration, flexibility, organization skills, and constant follow-up, just as the role and function of an attorney would. I am pleased to report that in all these areas, Paige is doing remarkably well, and I advocate for her reinstatement to the Texas Bar, as I feel she can function appropriately in that capacity."

2. Attorney's Affidavits.

The Commission may find it helpful to be informed from members of the State Bar of Texas as to why the reasons for suspension no longer exist and that there would be no danger to the public or profession or future clients if the Respondent is reinstated. Attorney Lewis K. Harley (see Ex. E) has been licensed for 26 years and has known Horelica since she was first licensed in 1999. He knows of her background; depression and loss of her license have been fully disclosed. Over the last year, Attorney Harley has observed the progress Horelica has made and opines that she is now progressed to the point she can do legal research and paralegal duties. She assisted Attorney Harley on a project under his direction that required her to do legal research without compensation for him and to collect and assemble relevant documents. He states: "Based on my observations from May, 2011 to the present, Paige Horelica exhibited excellent moral character, has the ability to make sound and rational decisions and has demonstrated her

ability to be able to abide by the rules of professional conduct and conduct herself ethically." The second attorney who has come forward to support Horelica is Attorney Derick Smith (see Ex. D) who has observed her progress and would like to use her on future legal projects.

3. Community Activities

Ministers Dr. Johnny Teague and Rev. Eddie Carter (see Ex. C & I) provide the Commission with evidence of Horelica's involvement with community construction, helping with a community garden, and the Garret Grove Food Pantry. Rev. Carter states: "She has not only contributed products to the food bank, but has given of her time and provided "Labor of Love" to pack many boxes and deliver, at her own expense, to those known homebound residents who otherwise would be unable to benefit from this community resource." Certainly both ministers have observed that the public has been benefited by her community activities.

4. Members of the Public would like to hire Horelica as their Attorney.

Horelica has not practiced law since she surrendered her law license. She has not attempted to in any way solicit legal business; however, that does not stop members of the public from approaching her and asking her to represent them. The affidavits of Frances Mills (see Ex. J) and John Wallace (see Ex. K) are representative of several members of the community who are aware of Horelica's history but would hire her as their attorney, if she was reinstated. The Affidavits of Doug Bietz (see Ex. G) and Albert Horelica (see Ex. H), as well as Michele Aston (see Ex. K), are also attached to show how others view this Application for Reinstatement. This information is provided so that

the Commission will recognize that Horelica is not in any way a threat or a danger to potential clients or to the community.

C. Status of Bankruptcy.

At the time of Respondent's suspension, the following grievances were pending against her:

HO100725529 TINA WASHINGTON

H0010825915 KATHELEEN KAMINER

H0050826816 DAISY LEA JAMES

H0040928676 BRANDY JONES


Due to the Respondent's financial condition, it was necessary to file for bankruptcy, all debts and obligations were listed with the bankruptcy court and are listed under Case Name: Paige Horelica, and under Case Number: 09-3425.

**IV.
PRAYER**

WHEREFORE, PREMISES CONSIDERED, Respondent, Paige Horelica, respectfully requests that this Commission enter an order declaring that Respondent is of good moral character; possesses the mental and emotional fitness to practice law; that the reasons for suspension no longer exist and that termination of the suspension would be without danger to the public and the profession, and that Respondent has lived a life of exemplary conduct in the two years immediately preceding the filing of this Petition, thereby entitling her to be reinstated and for further relief as is just and equitable.


Respectfully submitted,

BOB BENNETT AND ASSOCIATES PLLC

By: 
Robert S. Bennett
SBOT: 02150500
Bob Bennett and Associates PLLC
515 Louisiana, Suite 200
Houston, Texas 77002
(713) 225-6000
(713) 225-6001 (fax)
ATTORNEYS FOR Respondent

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing Motion has been served upon Timothy Bersch, Assistant Disciplinary Counsel, Office of the Chief Disciplinary Counsel, 600 Jefferson Street, Suite 1000 Houston, TX 77002 by facsimile at (713) 758-8292 and CMRRR (Article Number: 7011 2970 0003 5210 6664) and upon Linda Acevedo, Chief Disciplinary Counsel, 1414 Colorado Street, Austin, Texas 78701 by facsimile at (512) 427-4130 and CMRRR (Article Number 7011 2970 0003 5210 6688) on this 9th day of March, 2012.


Robert (Bob) S. Bennett

VERIFICATION

Before me, the undersigned notary public, on this day appeared Paige Horelica, who being duly sworn by me deposed and said:

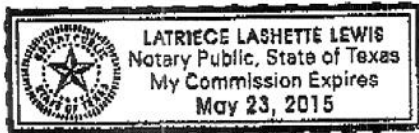
"My name is Paige Horelica. I am the Petitioner in this case. I am over the age of 21 and competent to make this verification. I have read the Motion for Reinstatement After Disability Suspension and I verify that the substantive facts stated therein are within my personal knowledge and are true and correct."

Paige Horelica
Paige Horelica

SUBSCRIBED AND SWORN TO BEFORE ME on March 8, 2012 to certify which witness my hand and official seal.

L. Lewis

Notary Public in and for Texas



CHAIR
W. CLARK LEA

VICE CHAIR
JOAL CANNON SHERIDAN

MEMBERS
ALICE A. BROWN
DAVID A. CHAUMETTE
JACK H. CREWS
GARY R. GURWITZ
MARVIN W. JONES
KATHY J. OWEN
DEBORAH J. RACE
BEN SELMAN
CHARLES I. SMITH
THOMAS J. WILLIAMS



EXECUTIVE DIRECTOR & GENERAL COUNSEL
CHRISTINE E. MCKEEMAN

DEPUTY DIRECTOR/COUNSEL
GAYLE RILLY VICKERS

EXECUTIVE ASSISTANT
JACQUEE L. TRUITT

THE BOARD OF DISCIPLINARY APPEALS
APPOINTED BY THE SUPREME COURT OF TEXAS

March 11, 2010

Robert S. Bennett
Lancaster Center
515 Louisiana, Suite 200
Houston, TX 77002

Timothy Bersch
Assistant Disciplinary Counsel
Office of the Chief Disciplinary Counsel
State Bar of Texas
600 Jefferson, Suite 1000
Houston, TX 77002

RE: *In the Matter of Paige Horelica*
BODA Case No. 46203
Agreed Indefinite Disability Suspension

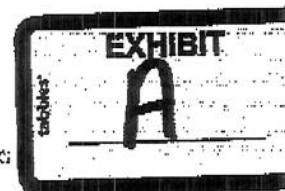
Dear Mr. Bennett and Mr. Bersch:

Enclosed is a copy of the signed **Agreed Judgment of Disability Suspension** in the above-referenced matter. Note that the Board has deleted the requirement that Ms. Horelica file the original affidavits with the Board of Disciplinary Appeals. Instead, the original affidavits should be filed with the Office of Chief Disciplinary Counsel. Compliance with the Agreed Judgment of Disability is monitored by the Office of Chief Disciplinary Counsel and there is no need to file the affidavit with the Board of Disciplinary Appeals.

Sincerely,

Gayle Vickers
Deputy Director/Counsel

Enclosure



BEFORE THE
SUPREME COURT OF TEXAS
BOARD OF DISCIPLINARY APPEALS

COMMISSION FOR LAWYER DISCIPLINE §

V. §

PAIGE HORELICA §
STATE BAR NUMBER 24010112 §

CASE NO. 46280

AGREED JUDGMENT OF INDEFINITE DISABILITY SUSPENSION

The Chief Disciplinary Counsel has sought and received authorization and direction from the Commission for Lawyer Discipline to seek a finding that Respondent, Paige Horelica, State Bar Number 24010112, is suffering from a disability as defined by Rule 1.06I of the Texas Rules of Disciplinary Procedure (TRDP). Respondent, by and through her counsel, Robert S. Bennett, agrees and stipulates that she is suffering from a disability, and she has executed a stipulation which supports a finding that Respondent, Paige Horelica, is suffering from a disability as defined by TRDP Rule 1.06I.

The Board of Disciplinary Appeals finds that Respondent, Paige Horelica:

1. has stipulated to the existence of a disability as defined by Rule 1.06I of the TRDP;
2. has waived the following rights found in Part XII of the TRDP:
 - a. the right to have a separate disability complaint filed against her;
 - b. the right to have a District Disability Committee appointed by the Board of Disciplinary Appeals; and
 - c. the right to a *de novo* hearing before the District Disability Committee to determine whether she is suffering from a disability as defined in Rule 1.06I of the TRDP; and
3. understands the effect of this judgment and has agreed to it freely and voluntarily.

It is, therefore, ORDERED, ADJUDGED, AND DECREED, pursuant to Part XII of the Texas Rules of Disciplinary Procedure, that Respondent, Paige Horelica, State Bar Card No. 24010112, is hereby SUSPENDED from the practice of law in the State of Texas immediately upon entry of this judgment and continuing thereafter until reinstated by this Board or by a court of competent jurisdiction.

It is further ORDERED that during said suspension Respondent, Paige Horelica, is prohibited from practicing law in Texas, holding herself out as an attorney at law, performing any legal services for others, accepting any fee directly or indirectly for legal services, appearing as counsel or in any representative capacity in any proceeding in any Texas or Federal court or before any administrative body, or holding herself out to others or using her name, in any manner, in conjunction with the words "attorney at law," "attorney," "counselor at law," or "lawyer."

It is further ORDERED that Respondent, Paige Horelica, within thirty (30) days from the date of this Judgment, shall notify in writing each of Respondent's current clients of this suspension. It is further ORDERED that, within the same period, Respondent shall return any and all files, papers, unearned monies, and other property belonging to current or former clients to the clients or to another attorney at the client's request.

It is further ORDERED that Respondent, Paige Horelica, within thirty (30) days from the date of this Judgment, shall file with the *Office of Chief Disciplinary Counsel, State Bar of Texas* *WV* ~~Board of Disciplinary Appeals~~, P.O. Box ~~12426~~ *2487*, Austin, Texas 78711, an affidavit stating that all current clients have been notified in writing of Respondent's suspension and that all files, papers, unearned monies, and other property belonging to all current or former clients have been returned as ordered herein. If Respondent should be unable to return any files, papers, unearned monies, or other property to any client or

former client, Respondent's affidavit shall state with particularity the efforts made by Respondent with respect to each particular client and the cause of her inability to return to said client the items in question. Respondent is also ORDERED to mail a copy of ~~said affidavit and~~ ^{all} all notification letters to clients to the Office of the Chief Disciplinary Counsel, State Bar of Texas, P.O. Box 12487, Austin, Texas 78711-2487 (1414 Colorado Street, Austin, Texas 78701).


It is further ORDERED that Respondent, Paige Horelica, within thirty (30) days from the date of this Judgment, shall notify in writing each and every justice of the peace, judge, magistrate, administrative judge or officer, and chief justice of each and every court or tribunal in which Respondent has any legal matter pending, if any, of this suspension, the style and cause number of the pending matter(s), and the name, address, and telephone number of the client(s) Respondent is representing in that court.

It is further ORDERED that Respondent, Paige Horelica, within thirty (30) days from the date of this Judgment, shall file with the ^{Office of Chief Disciplinary Counsel, State Bar of Texas} ~~Board of Disciplinary Appeals~~, P.O. Box ¹²⁴²⁶ ~~12426~~, Austin, Texas 78711-²⁴⁸⁷ ~~2487~~, an affidavit stating that Respondent has notified in writing each and every justice of the peace, judge, magistrate, administrative judge or officer, and chief justice of each and every court or tribunal in which Respondent has any matter pending of this suspension, the style and cause number of the pending matter(s), and the name, address, and telephone number of the client(s) Respondent is representing in that court. Respondent is also ORDERED to mail ~~a copy of said affidavit and~~ ^{all} all notification letters to the Office of the Chief Disciplinary Counsel, State ^{Bar} ~~Bar~~ of Texas, P.O. Box 12487, Austin, Texas 78711-2487 (1414 Colorado Street, Austin, Texas 78701).

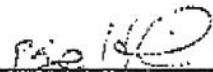
It is further ORDERED that Respondent, Paige Horelica, within thirty (30) days from the date of this Judgment, shall surrender her Texas law license and permanent State Bar Card to the

Office of the Chief Disciplinary Counsel, State Bar of Texas, P.O. Box 12487, Austin, Texas
78711-2487 (1414 Colorado Street, Austin, Texas 78701).

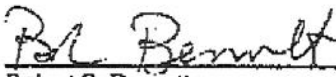
Signed this 9th day of March, 2010.


W. CLARK LEA
CHAIRMAN
TEXAS BOARD OF DISCIPLINARY APPEALS

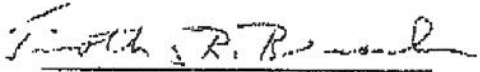
AGREED AS TO BOTH FORM AND SUBSTANCE:


Patric Horolica
State Bar No. 24010112
Respondent

Date: 3/4/10


Robert S. Bennett
State Bar No. 02150500
Attorney for Respondent

Date: 3/4/10


Timothy R. Bersch
Assistant Disciplinary Counsel
State Bar No. 02254500
Attorney for Petitioner

Date: 3-4-10

By: <u>FILED</u>
Mar 09 2010
Board of Disciplinary Appeals appointed by the Supreme Court of Texas

BEFORE THE
SUPREME COURT OF TEXAS
BOARD OF DISCIPLINARY APPEALS

COMMISSION FOR LAWYER DISCIPLINE §

V. §

PAIGE HORELICA §
STATE BAR NUMBER 24010112 §

CASE NO. 4608

RESPONDENT'S STIPULATION AND WAIVER

COMES the Respondent, Paige Horelica, and for her Stipulation and Waiver docs state:

1. I stipulate that I suffer from a mental and emotional condition that results in my inability to practice law, provide client services, complete contracts of employment, or otherwise carry out my professional responsibilities to clients, courts, the profession, and the public.

2. I waive the following rights found in Part XII of the Texas Rules of Disciplinary Procedure:

- a. the right to have a separate disability complaint filed against me;
- b. the right to have a District Disability Committee appointed by the Board of Disciplinary Appeals; and
- c. the right to a hearing before the District Disability Committee to determine whether I am suffering from a disability as defined in Rule 1.06J of the Texas Rules of Disciplinary Procedure.

3. I further stipulate that I understand the effect of the Agreed Judgment of Indefinite Disability Suspension signed by me and in support of which I am providing this Stipulation and Waiver, and that I have signed this Stipulation and Waiver and agreed to said Judgment freely and voluntarily.



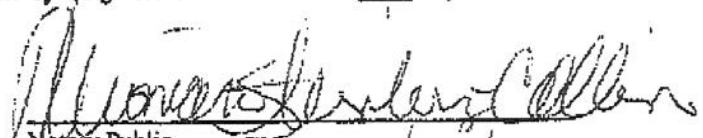
PAIGE HORELICA

STATE OF TEXAS


§
§
§

COUNTY OF HARRIS

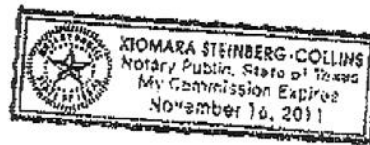
Subscribed and sworn to before me by Paige Horelica on this the 4 day of March,
2010.


Notary Public
My Commission Expires: 11/14/2011

WITNESSED AND APPROVED:


Robert S. Bennett
State Bar No. 02150500
Attorney for Respondent

Date: March 4, 2010



PENDING GRIEVANCES INVOLVING PAIGE HORELICA

HO100725529 Tina Winningham

H0010825915 Kathleen Kaminer

H0050826816 Daisy Lea James

H0040928676 Brandy Jones

02/28/2012 TUE 2:48 FAX 281 693 5809 Haymond & Rappaport

002/003



**Haymond, Rappaport,
& Associates, P.C.**

310 South Main Road, Suite 309 • Katy, Texas 77450 • Phone: (281) 693- 6800 • Facsimile: (281) 693- 6809

February 28, 2012

State Bar of Texas

RE: Paige Horelica

Affidavit of Paula J. Haymond, Ed.D. Licensed Psychologist #23545

Paula J. Haymond, Ed.D. appeared in person before me and stated under oath:

"My name is Paula J. Haymond, Ed.D. Licensed Psychologist in the State of Texas. The facts stated within this document are within my professional and clinical knowledge and are true and correct."

"My name is Paula J. Haymond, Ed.D. I maintain a private practice as a vocational rehabilitation psychologist in the state of Texas. Paige Horelica was referred to me initially for individual counseling in May 2010 following her traumatic brain injury and as part of her rehabilitation program through the Texas Department of Assistive and Rehabilitative Services (DARS). Paige was referred as a part of her program of rehabilitation services to address her symptoms of major depression associated with her TBI of August 23, 2008."

"Following an initial session to collect relevant personal, social, occupational, medical and educational history, Paige was seen for two additional individual counseling sessions to determine the appropriate course of treatment. A strong recommendation was conveyed to her DARS counselor, that Paige should receive the following services: 97532 Development of cognitive skills to improve attention, memory, problem solving (including compensatory training), direct (one on one) patient contact by the provider."

"My request for these services was granted on June 2010. The services consisted of 144 units of one on one direct training sessions with Paige. Over the course of these sessions cognitive skill development initially focused on the use of the Wayne State University structured exercises for outpatient cognitive recovery from closed head injuries developed by Susan Burbank. During the sessions and through weekly homework assignments, Paige diligently worked through exercise aimed at improving the following cognitive areas: attention and concentration, immediate and delayed visual memory, verbal comprehension, executive functioning and problem solving, as well as organization and planning."

"Within several sessions the focus of training moved to the more practical application of skill recovery to sorting out Paige's legal obligations, client grievances and seeking reinstatement of her license to practice law in the State of Texas. To those ends, work began in sorting out the papers from her practice which was hastily closed in 2008 including the four cases which resulted in grievances filed against her for failure to meet her obligations as a representative attorney."

"As Paige has worked to improve her cognitive skill recovery, her symptoms of major depression have slowly lifted. She no longer views her traumatic brain injury from the standpoint of being victimized by her fall. She has been able to seek guidance from her pastor as well as from fellow patients to find meaning in her experiences which both benefits her own recovery as well as those of others in similar circumstances around her."



02/28/2012 TUE 2:48 FAX 281 693 5809 Haymond & Rappaport

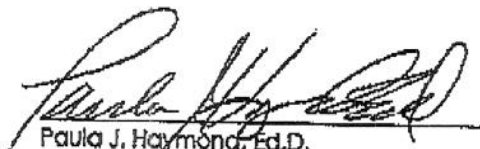
003/003

2 Paige
Horelica,

"Beyond the sessions authorized by DARS, Paige has continued her own work to rise to her professional responsibilities by recognizing and acting upon guidance from her attorney, pastor, doctors and family to offer amends to those in her past dealings. She has worked tirelessly to give back to her community through numerous volunteer hours in community service."

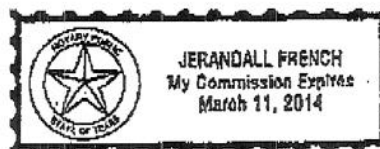
"Paige has been seen by me several times in the last month for follow-up sessions. I find her to be free of symptoms of major depression. She has improved significantly in her personal, social, occupational, medical and spiritual life. She has been successful in her recovery process which she has maintained commitment to over the last two years."

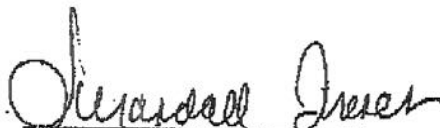
"It is my professional opinion reinstating Paige Horelica's license to practice law would be of benefit to the State of Texas and the community in which she lives."


Paula J. Haymond, Ed.D.
Licensed Psychologist
Texas 23543

STATE OF TEXAS

COUNTY OF Harris
SIGNED under oath before me
On February 28, 2012




Notary Public, State of Texas

View profileYou are searching in **Psychologists**. To change this selection, go back to the [basic search](#).**Licensee profile:**

License number:	23545
License Status:	Active
Name:	PAULA J. HAYMOND ED.D
Accessibility:	Fully Accessible
Health Service Provider Certification:	No
Link to facility web site:	
No. (Number) of years practiced as licensee holder:	23
Year licensed in Texas:	1988
Language translation services:	English Only
Insurance information:	Insurance not accepted
Address:	<div>Business name: Haymond, Rappaport, & Associates, P.C.</div> <div>Primary practice address: Yes</div> <div>Street address: 810 South Mason Road, # 309</div> <div>City: Katy</div> <div>State: TX</div> <div>ZIP: 77450</div> <div>Country/Province:</div> <div>Telephone: 281-693-5800</div> <div>Fax (Facsimile): 281-693-5809</div>
Formal education:	<div>Year of graduation: 1982</div> <div>Degree received: Ed.D.</div> <div>University/Institution: Indiana University, Bloomington, IN</div>
Hospital affiliation(s):	
Specialty certification(s):	<div>Title: Comprehensive Vocational Evaluation System: Blind & Visual</div> <div>Issuing authority/body: Jack Dial, Ph.D.</div>

Church at the Cross

3835 S. Dairy Ashford, Houston, Texas 77064

February 25, 2012

To the State Bar of Texas,

My name is Dr. Johnny Teague, Senior Pastor of Church at the Cross in Houston, Texas. I am competent to make this affidavit. The facts stated in this affidavit are true and correct within the view and scope of my personal exposure to Ms. Paige Horelica.

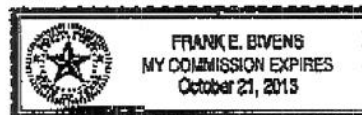
I was introduced to Paige through her step-mother Martha Horelica who was a great member of my two churches – Calvary Baptist Church in Weimar, Texas, and now Church at the Cross. Martha had a great love and concern for Paige and longed for me to meet her and to have her attend our church. Martha had told me about the head injury that Paige had sustained and how she longed for her to be healthy again and able to practice law. During my pastorate at Church at the Cross, I got to meet Paige, worship with Paige, and know Paige personally as my family and I shared a few meals together with her. I also had the privilege to work alongside Paige during the construction of our new church building and through our community garden initiative which we planted in coordination with the local Boy Scout troop. The time span for our relationship began in 2009 and extends to this day.

I feel Paige, through her diligence with doctors and therapy, has made incredible progress and is now ready to resume her practice in law. It is a great testimony to her endurance and dedication that she has come through such a tragic accident and now is able to function fully in the work that she has been gifted to do. She has always shown herself to be honest, trustworthy, and capable fulfilling the standard required for an attorney at law in our state. I support her application for reinstatement.

Should you have any questions, or would like to inquire further, please do not hesitate to call me at 281-924-4460. If you prefer, you may email me at johnnyteague@sbcglobal.net.

Sincerely,


Dr. Johnny Teague



State of Texas

County of HARRIS

SIGNED under oath before me on February 25, 2012.


Notary Public, State of Texas

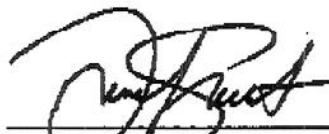


**AFFIDAVIT FOR REINSTATEMENT
RECOMMENDATION FOR PAIGE HORELICA**

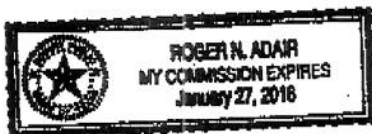
BEFORE ME, the undersigned authority, personally appeared DERICK SMITH, who, after being by me duly sworn stated the following under oath:

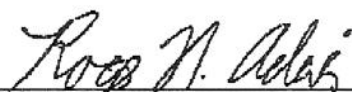
"My name is DERICK SMITH. I am a Lawyer licensed to practice law in the State of Texas. The statements contained herein are true and correct.

"I was excited to learn that Paige Horelica was applying for reinstatement of her Law License. I was familiar with Paige's work as a Lawyer. Originally, I would more often be the one to give her advice early in her practice. She was careful to ask the right questions. Later, I found myself asking her questions as it became clear that she had developed great skills as a Lawyer. I felt confident in referring her cases. I was aware of her brain injury and subsequent depression. I tried to encourage her to accept some light work with me in Fort Bend County, but she knew her limits and respectfully declined. It was troubling for me to learn that she ultimately surrendered her Law License. However, it has been extremely encouraging to learn of the success of her Cognitive Therapy and Skill Development with the help of a Psychologist. I have recently had conversations with Paige and feel confident she will again function well as a Lawyer and certainly has the fitness for practicing Law. I will be happy to have her assistance on any matters I know she can assist with, including research and drafting review the next time I am asked to speak at a continuing legal education seminar. I look forward to seeing Paige reinstated to practice Law in Texas."


DERICK SMITH, Affiant

SWORN and SUBSCRIBED before me, the undersigned authority, on this 24th day of February, 2012.




Notary Public, State of Texas



STATE OF TEXAS

COUNTY OF HARRIS

**AFFIDAVIT OF LEWIS K. HARLEY IN SUPPORT OF PAIGE HORELICA'S
APPLICATION FOR REINSTATEMENT TO PRACTICE LAW IN TEXAS**

Lewis K. Harley, being first duly sworn, deposes and says:

1. "I am admitted to practice in the State of Texas since 1986. I submit this affidavit in support of Paige Horelica's application for reinstatement to practice law in the State of Texas;
2. I have known Paige Horelica from the time she was admitted to the Bar and familiar with her mental competency at that time;
3. I am also aware that Paige Horelica suffered an accident that resulted in brain injury, memory lost, depression, what appeared to be isolation or withdrawal, as a result of the injuries she sustained;
4. Further, following her injuries I was made aware that Paige Horelica was not physically and mentally competent to practicing law in this state and that her license to practice law in the State of Texas was suspended based on that disability;
5. Based on conversations with Ms. Horelica, her family, friends and professional colleagues I was made aware that Paige Horelica was undergoing treatment for her mental and physical injuries. I therefore had knowledge that her medical care included treatment by a psychologist; that she received cognitive therapy and other forms treatments or care for which I was not privy;
6. During the period of her treatment I have personally observed Ms. Horelica's progress and response to the care she was receiving and although I am not trained as a medical professional I observed great and sustained improvements over a period of time;
7. I observed that Paige Horelica's progress and response to treatment was significant enough that I felt confident that she was competent to assist me in doing legal research and other paralegal type functions. She did this work on a voluntary basis and without any form of compensation;
8. On or about May 16, 2011 Ms. Horelica assisted me in gathering background information for a pro bono case for a civic group in Calvert Texas involving an ADA matter;



9. On or about May 26, 2011 and July 7, 2011 Ms. Horelica assisted me at meetings with members of the civic group mentioned in item 8 above by collecting and assembling relevant documentation. She also successfully performed legal research for this matter;

10. In my opinion based on my observations over an extended period Paige Horelica has the present ability to function as an attorney;

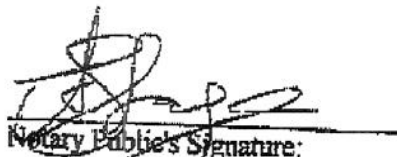
11. Based on my observations from May, 2011 to the present Paige Horelica exhibited excellent moral character, has the ability to make sound and rational decisions and has demonstrated her ability to be able to abide by the rules of professional conduct and conduct herself ethically.

12. Based on the foregoing I unequivocally support the reinstatement of Paige Horelica to the practice law in the State of Texas."


Lewis K Harley
Affiant's Signature

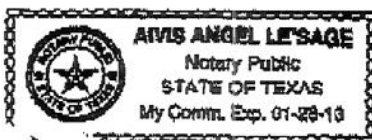
Affiant on oath swears that the statements are true and correct based on his or her personal knowledge and affiant has:

SWORN TO AND SUBSCRIBED BEFORE ME on February 23rd 2012 by Lewis K. Harley.


Notary Public's Signature:

NOTARY PUBLIC FOR THE STATE OF TEXAS

(Seal) My commission expires: 1-28-13



02/23/2012 08:25 2815150223

SIENNA HOME HEALTH

PAGE 03/03



SIENNA HOME HEALTH CARE

TO STATE BAR OF TEXAS
RE: PAIGE MORELICA

AFFIDAVIT OF JAN WALSTON, MSN/RN

JAN WALSTON appeared in person before me today and stated under oath:

"My name is JAN WALSTON. I am competent to make this affidavit. The facts stated with this affidavit are within my personal knowledge and are true and correct."

"My name is JAN WALSTON, MSN/RN. I am Paige's mother. I am a Masters Prepared Nurse and am aware of Paige's traumatic brain injury (TBI) and the resultant one-year period of major depression, isolation, and solitude following the incident. Further, during that time, I had a Power of Attorney to handle Paige's financial affairs. Sometime towards the end of the first year after the accident, Paige started taking care of her own debts and obligations, and continues to do so today."

"Two years ago, Paige surrendered her license."

"Three years ago, she started working part-time in Human Resources for a company in which I was her supervisor. During this period of employment, she engaged in extensive therapy at TIRR Memorial Hermann Hospital working on her cognition and skills. To address her depression at this time, she attended the 20th Annual Lawyers Concerned for Lawyers Convention, as well as some depression support groups through the Texas Lawyers Assistance Program and a local group The Houston Lawyers Concerned for Lawyers. Later the next year, she added weekly therapy sessions with a licensed psychologist, Paula Haymand. Paige was committed to those counseling sessions and attended regularly from early 2010 through the end of that year."

"After a year, we both moved to a new company; and as I had seen considerable progress and improvement in her work ability, Staffing Coordinator was added to her Human Resources duties. After she had completed her cognitive skills development and the weekly counseling with her psychologist, Paige was better able to manage her emotions and critical thinking. Accordingly, her work abilities have increased, and Case Management has recently been incorporated into her area of responsibilities."

"All three of these areas - Human Resources, Staffing, and Case Management - require extensive attention to detail, concentration, flexibility, organizational skills, and constant follow-up, just as the role and function of an attorney would. I am pleased to report that in all these areas, Paige is doing remarkably well, and I advocate for her reinstatement to the Texas Bar, as I feel she can function appropriately in that capacity."

Jan Walston
JAN WALSTON, MSN/RN
Administrator
Sienna Home Health Care

State of Texas
County of Robertson

SIGNED under oath before me
on February 23, 2012

Corinda Carol Jackson
Notary Public, State of Texas

14011 Park Drive #218, Tomball, TX 77377-6292 - Phone 281-516-0255 - Fax 281-516-0233



CORINDA CAROL JACKSON
Notary Public, State of Texas
My Commission Expires
FEBRUARY 28, 2013



B & W CONSULTING SERVICES

TO WHOM IT MAY CONCERN
RE: PAIGE HORELICA

I AM AWARE OF PAIGE'S HEAD INJURY AND HER SUBSEQUENT DISABILITY AND SURRENDERING OF HER LICENSE TWO YEARS AGO.

I AM THE FINANCIAL CONSULTANT FOR THE COMPANY IN WHICH PAIGE IS CURRENTLY EMPLOYED. THE DUTIES IN HER AREAS OF RESPONSIBILITY REQUIRE CRITICAL THINKING, ORGANIZATIONAL SKILLS, ACUTE ATTENTION TO DETAIL, CONCENTRATION, FLEXIBILITY, AND FREQUENT DAILY FOLLOW-UPS. OVER THE PAST TWO YEARS, I HAVE OBSERVED CONSIDERABLE PROGRESS AND IMPROVEMENT IN PAIGE'S ABILITY TO PERFORM QUITE WELL IN THAT ENVIRONMENT, MANAGE THE STRESS, AND MAINTAIN EMOTIONAL STABILITY.

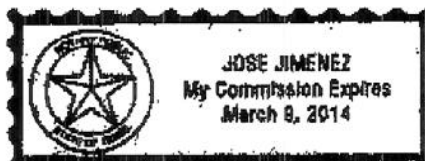
I WOULD RECOMMEND PAIGE'S REINSTATEMENT TO THE TEXAS BAR, AS I FEEL SHE HAS REGAINED THE ABILITY TO FUNCTION APPROPRIATELY IN THAT FIELD.

RESPECTFULLY,

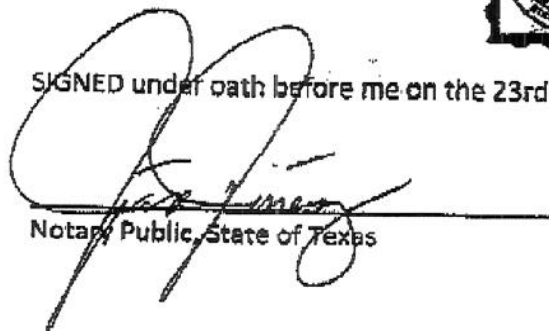


DOUG RIETZ
B&W CONSULTANTS SERVICES

STATE OF TEXAS §
COUNTY OF HARRIS §



SIGNED under oath before me on the 23rd day of February 2012.


Notary Public, State of Texas

13686 Garden Grove Court, Houston Texas 77082 Ph: 281-493-2996

713-252-9448



254-697-6469

line 1

12:24:10 p.m. 02-23-2012

2/2

STATE OF TEXAS

COUNTY OF MILAM

AFFIDAVIT OF ALBERT HORELICA

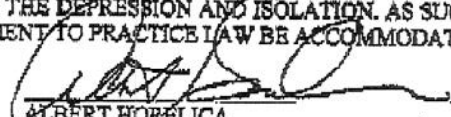
MY NAME IS ALBERT HORELICA, I AM PAIGE'S FATHER. I RESIDE IN CAMERON, TEXAS WITH MY MOTHER, WHO IS NOW 94 YEARS OLD. SHE SUFFERS FROM SEVERAL ILLNESSES, INCLUDING CONGESTIVE HEART FAILURE, HYPERTENSION, AND MORE SPECIFIC FOR THIS AFFIDAVIT, URINARY INCONTINENCE, SEVERE DEMENTIA, AND PROGRESSIVE DEBILITY.

DURING THE FIRST 4 WEEKS AFTER PAIGE WAS DISCHARGED FROM THE HOSPITAL, HER DOCTOR'S WERE CONCERNED SHE MAY HAVE A SEIZURE. THEREFORE, SHE ROTATED BETWEEN FAMILY MEMBERS WHO WOULD DRIVE FOR HER AND SUPERVISE HER, INCLUDING ME. DURING THIS TIME PAIGE RECOGNIZED HER GRANNY'S NEEDS. WHEN SHE WAS ABLE TO DRIVE BY HERSELF AGAIN AND FOR THE NEXT TWO AND A HALF YEARS SHE GAVE UP HER WEEKENDS TWICE A MONTH AND DROVE FROM RICHMOND, TX TO CAMERON, TX [this is a 263 mile round trip] TO ASSIST WITH MOTHER'S CARE AND PROVIDE RESPITE FOR ME. DURING THESE WEEKENDS, PAIGE GOT MY MOTHER UP IN THE MORNINGS, GAVE HER BATHS, HELPED HER GET DRESSED, PREPARED MEALS, WORKED WITH HER TO PERFORM THE EXERCISES RECOMMENDED BY THE PHYSICAL THERAPIST, AND PERFORMED MEMORY ENHANCEMENT AND REORIENTATION EXERCISES WITH HER AS RECOMMENDED BY THE NURSE. AT THE END OF EACH DAY, SHE HELPED HER PREPARE FOR THE NIGHT BY GIVING MOTHER MEDICATION REMINDERS AND ASSISTING HER TO GET COMFORTABLE IN BED.

PAIGE EXHIBITED EXTRAORDINARY PATIENCE, COMPASSION, AND EMOTIONAL CONTROL IN WHAT CAN ONLY BE DESCRIBED AS A VERY DIFFICULT AND PERSONALLY STRESSFUL SITUATION.

PAIGE HAS ALWAYS HAD A COMPASSION FOR OTHERS. NOT ONLY WAS THIS DEMONSTRATED THROUGH HER CARE OF MY MOTHER, BUT EVEN WHILE PAIGE WAS RECOVERING HERSELF PHYSICALLY/MENTALLY SHE CARED FOR/THOUGHT OF OTHERS. AS AN EXAMPLE, SHE HAS SHOWN A SENSITIVITY TOWARDS HUNGRY PEOPLE BY DONATING GOODS AND WORKING MANY TIMES WITHIN THE PAST 2 YEARS AT FOOD BANKS IN BOTH HOUSTON AND CALVERT, TEXAS. FURTHER, IN 2011 SHE DONATED 18 INCHES OF HAIR TO ST. JUDE'S FOR THE BENEFIT OF A CHILD WITH CANCER.

ACTIONS LIKE THIS NOT ONLY DEMONSTRATE HER MORAL FITNESS, BUT ALSO HELPED CONTRIBUTE TO PAIGE'S ADVANCEMENT OUT OF THE DEPRESSION AND ISOLATION. AS SUCH, I AM ASKING THAT PAIGE'S REQUEST FOR REINSTATEMENT TO PRACTICE LAW BE ACCOMMODATED.

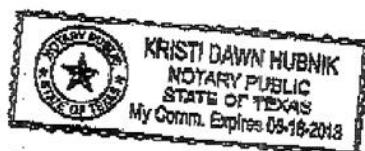

ALBERT HORELICA

SWORN TO AND SUBSCRIBED BEFORE ME on the 23rd day of February 2012 by ALBERT HORELICA.


Notary Public's Signature:

NOTARY PUBLIC FOR THE STATE OF TEXAS

(Seal) My commission expires: 02-16-2013



02/23/2012 08:25 2815160223

SIENNA HOME HEALTH

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TO WHOM IT MAY CONCERN:

Rev. EDDIE CARTER appeared in person before me today and stated under oath:

"My name is EDDIE CARTER, I am competent to make this affidavit. The facts stated within this affidavit are within my personal knowledge and are true and correct."

"I am the licensed proprietor of Garrett Grove Food Pantry in Calvert, Texas. I have had the pleasure of knowing and working with Paige since mid year of 2011. She brought to my attention several of our homebound residents who were not aware of, or enrolled in, this program; and made the effort to get the necessary paperwork to them; help them fill it out, and return the completed documents to me. She not only has contributed products to the food bank, but has given of her time and provided the "Labor of Love" to pack many boxes and deliver, at her own expense, to those known homebound residents who otherwise would be unable to benefit from this community resource."

"Paige impresses me as being a compassionate and hard-working young woman who is sensitive to the needs of others and wants to help where she can. I find Paige to be trustworthy and honest and on that basis would support her request to reinstate her law license that was surrendered after her head injury."

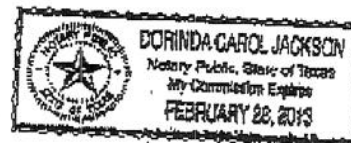
RESPECTFULLY,

Eddie Carter
Rev. EDDIE CARTER

STATE OF TEXAS
COUNTY OF Robinson

SIGNED under oath before me on the 23 day of February 2012.

Dorinda Carol Jackson
Notary Public, State of Texas



02/23/2012 08:25 2815168223

SIENNA HOME HEALTH

PAGE 02/03

TO THE STATE BAR OF TEXAS REGARDING PAIGE HORELICA:

MY NAME IS FRANCES MILES. I AM A RESIDENT OF ROCKDALE, TEXAS. I MET PAIGE IN MAY 2011. I AM AWARE THAT SHE FORMERLY PRACTICED LAW AND SURRENDERED HER LICENSE IN 2010 AFTER SHE FELL 8 FEET FROM A LADDER ONTO HER HEAD.

MY FATHER, ROOSEVELT ANDERSON, IS IN SERIOUS DECLINING HEALTH. MS. HORELICA HAS NOT SOLICITED MY BUSINESS, BUT I DID APPROACH HER TO ASSIST WITH MY FATHER'S ESTATE MATTERS. I HAVE EXPRESSED MY DESIRE TO HAVE MS. HORELICA FINALIZE HIS WILL AND ANY OTHER ANCILLARY MATTERS APPROPRIATE FOR ESTATE PLANNING.

AS I UNDERSTAND, MS. HORELICA IS MAKING APPLICATION TO REINSTATE HER LICENSE. I AM WILLING TO WAIT FOR THIS TO HAPPEN; AND, I WOULD ASK THAT THIS REQUEST BE GRANTED AND SHE BE RESTORED TO PRACTICE LAW IN TEXAS.

Frances Miles

FRANCES MILES

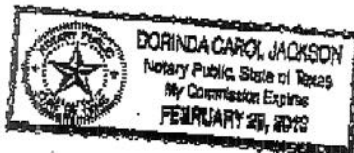
Affiant's Signature

SWORN TO AND SUBSCRIBED BEFORE ME on February 22, 2012 by FRANCES MILES.

Dorinda Carol Jackson
Notary Public's Signature:

NOTARY PUBLIC FOR THE STATE OF TEXAS

(Seal) My commission expires: 02-28-13



02/24/2012 10:37 2815160223
Feb/24/12 10:32a SIENNA HOME HEALTH

SIENNA HOME HEALTH

PAGE 02/02

02/23/2012 12:47 2815160223

SIENNA HOME HEALTH

PAGE 01/02

STATE OF TEXAS

COUNTY OF ROBERTSON

TO THE STATE BAR OF TEXAS:

"My name is JOHN WALLACE. I am a resident of Robertson County. I am the owner of Sandblast Specialties. My wife, MICHELE ASHTON, and I met Paige Horelica sometime last year. I am aware that Ms. Horelica had a bad accident that left her with some mental/health issues. I however, after having conversations with her, am comfortable and confident in her abilities to assist me in a contractual dispute that also involves a mechanic's lien. Ms. Horelica did not come to me asking for business. In fact, I approached her recently acknowledging that I would wait for her reinstatement and I advocate that on her behalf."

JOHN WALLACE

SWORN TO AND SUBSCRIBED BEFORE ME on the 14 day of February 2012 by JOHN WALLACE.

Dorinda Carol Jackson
Notary Public's Signature:



NOTARY PUBLIC FOR THE STATE OF TEXAS

(Seal) My commission expires:

"My name is MICHELE ASHTON. I am a resident of Robertson County. My husband, John Wallace, and I met Paige Horelica sometime last year. I know about Ms. Horelica's fall that left her with brain problems and depression. She has discussed with me the cognitive, behavioral and emotional therapy she underwent within the last 3 years. I am of the opinion Ms. Horelica is a trustworthy person who can effectively handle my estate planning needs for a Codicil. I support her application for reinstatement."

MICHELE ASHTON

SWORN TO AND SUBSCRIBED BEFORE ME on the 23 day of February 2012 by MICHELE ASHTON.

Dorinda Carol Jackson
Notary Public's Signature:

NOTARY PUBLIC FOR THE STATE OF TEXAS

(Seal) My commission expires: 02-28-13

