

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA

CASE NO.: 4:25-cv-00383-SEH-SH

PLAINTIFF: O. Gene Bicknell

DEFENDANTS: Richard M. Silanskas Jr., Pro Se; Larry K. Wilhite; Stephen D. Hedrick

NOTICE TO THE COURT OF FILING OF ETHICS COMPLAINT AGAINST PLAINTIFF'S COUNSEL  
COMES NOW the Defendant, Richard M. Silanskas Jr., Pro Se only, and respectfully notifies this  
Court as follows:

1. On or about **December 1, 2025**, Defendant Richard M. Silanskas Jr. filed a formal complaint with the **District of Columbia Bar Disciplinary Board Office of Disciplinary Counsel District of Columbia Court of Appeals 515 5th Street NW Building A Suite 117 Washington, DC 20001** regarding alleged ethical violations by Plaintiff's counsel, **Michael S. Nadel, Esq.**, of McDermott, Will & Schulte, Washington, D.C.
2. The complaint was filed based on conduct observed during the course of this litigation, including actions that Defendant believes **may be inconsistent with the rules of professional conduct governing attorney behavior** in the District of Columbia.
3. Defendant submits this Notice to ensure the Court is aware that **formal concerns regarding counsel's professional conduct** have been raised with the appropriate disciplinary authority. While Defendant does not seek to substitute this filing for evidence in the merits of this case, the complaint is relevant insofar as it may impact ongoing **discovery disputes and procedural fairness**.
4. **Attached hereto as Exhibit A** is a true and correct copy of the complaint filed with the District of Columbia Bar Disciplinary Board.
1. Based upon the incidents and behavior of Mr. Nadel as described, I **seriously question the motivation and validity of all motions and subpoenas issued or pursued by Mr. Nadel to date in this case**. His pattern of hostility, misrepresentation, and targeted behavior toward me raises substantial concerns about whether his litigation actions are being conducted ethically, lawfully, or in good faith.
1. Defendant respectfully requests that this Notice be **filed and made part of the official record** in this case, for transparency and so the Court may consider the existence of the complaint in the context of counsel's conduct, if relevant to future proceedings.

WHEREFORE, Defendant Richard M. Silanskas Jr., Pro Se only, respectfully submits this Notice to the Court

Respectfully submitted,

  
\_\_\_\_\_  
/s/ Richard M. Silanskas Jr.

Richard M. Silanskas Jr., Pro Se

1338 Peace in Valley Road

Blue Eye, Missouri 65611

Phone: (352) 205-5131

Email: ricksilanskas@gmail.com

Amelia A. Fogleman, OBA No. 16221

Joseph W. Lang, OBA No. 33019

GABLE

GOTWALS

110 N. Elgin Avenue, Suite 200

Tulsa, Oklahoma 74120

J. Christopher Davis

Crowe and Dunlevy PC

222 N Detroit Ave

Suite 600

Tulsa, Oklahoma 74120

Lysbeth George

Liz George and Associates

8101 South Walker

Suite F

Oklahoma City, Oklahoma 73139

**Richard M. Silanskas Jr.**

Defendant, Pro Se

Case No. 4:25-cv-00383-SEH-SH

United States District Court

Northern District of Oklahoma

December 1, 2025

**Office of Disciplinary Counsel**

District of Columbia Court of Appeals

515 5th Street NW

Building A, Suite 117

Washington, DC 20001

**Re: Formal Ethics Complaint Against Attorney Michael S. Nadel**

McDermott, Will & Schulte

500 North Capitol Street NW

Washington, DC 20001-1531

Dear Office of Disciplinary Counsel:

I, **Richard M. Silanskas Jr.**, Defendant Pro Se in federal civil case **4:25-cv-00383-SEH-SH**, United States District Court for the Northern District of Oklahoma, respectfully submit this formal complaint concerning the conduct of **Mr. Michael S. Nadel**, counsel for Plaintiff **Mr. O. Gene Bicknell**.

As one of three defendants in this matter, and as an unrepresented litigant, I have experienced a sustained pattern of misrepresentation, disrespectful communication, obstruction of discovery, and conduct inconsistent with the candor and honesty required of members of the District of Columbia Bar. I consider Mr. Nadel's behavior to reflect a targeted attack on me as a Pro Se litigant, with his behavior escalating and inducing intense fear, concern for my safety, and concern for my ability to achieve justice. I believe Mr. Nadel has a specific agenda detrimental to my well-being. The conduct described below forms the basis for this complaint.

**I. INITIAL DECEPTION REGARDING PLAINTIFF'S MEDICAL CONDITION**

From the outset of litigation, Mr. Nadel's communications revealed a concerning disregard for accuracy, transparency, and professional honesty. On October 17, 2025, when defendants

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attempted to schedule the deposition of Plaintiff Mr. O. Scott Bicknell, Mr. Nadel responded by sending a letter claiming:

- Mr. Bicknell suffered a severe medical event on October 7, 2025;
- He was hospitalized and diagnosed with encephalopathy;
- He was discharged into "HOME HOSPICE" on or about October 12, 2025; and
- He could not sit for deposition and his recovery prospects were "uncertain."

The term hospice is universally understood to refer to end-of-life care for a patient whose death is expected within a short time period. It indicates a condition consistent with being medically fragile, bedridden, and in decline—not a person capable of performing normal physical activities or travel. Defendants, alarmed at the severity of these statements, requested medical documentation to substantiate the hospice claim.

## II. MEDICAL DOCUMENTATION CONTRADICTED HIS CLAIMS

On October 22, 2025, Mr. Nadel provided a letter from:

**Dr. Mindi S. Garner, DO, FACP**

127 West 5th Street

Pittsburg, Kansas 66762

Dr. Garner's letter referenced:

- A stroke
- Episodic encephalopathy
- Residual symptoms

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However, the letter made no reference whatsoever to Mr. Bicknell being placed on hospice care, nor did it mention any hospitalization around October 7 or October 12. It also contained no description of any condition approaching end-of-life status.

It is not more than interesting that the letter provided by Mr. Nadel indicated Mr. Bicknell could not stand for deposition and was homebound, yet within weeks the subsequent events reveal a starkly different reality.

### III. SHOCKING CONTRADICTION: BOWLING ALLEY APPEARANCE NOVEMBER 12, 2025

On November 12, 2025—barely weeks after being told Mr. Bicknell was in “home hospice”—Holiday Lanes Bowling Alley in Pittsburg, Kansas publicly posted multiple photographs of Mr. O. Gene Bicknell:

- smiling, upright in his wheelchair
- socially engaging with family
- actively bowling

It was more than disturbing that this revelation of Mr. Bicknell at a bowling alley followed very shortly after both the letter from Mr. Nadel and the letter from Dr. Garner, thus suggesting significant questions regarding the veracity of Mr. Nadel’s and Dr. Garner’s statements. For a man allegedly receiving hospice care—a status incompatible with bowling, social outings, or physical activity—these images were wholly irreconcilable with the narrative advanced by Mr. Nadel. The only reasonable conclusion is that material misrepresentations were made for the purpose of preventing defendants from obtaining a lawful and necessary deposition.

### IV. SUDDEN TRIP TO FLORIDA

After defendants confronted the inconsistency between hospice status and the bowling alley

photographs, they again attempted to schedule Mr. Bicknell's deposition.

In response, defendants were abruptly informed that Mr. Bicknell had suddenly taken his private jet to his home in Englewood, Florida, on the beach, rendering him unavailable.

A deposition was eventually agreed to—scheduled at Mr. Bicknell's Florida residence on December 8, 2025. **It remains to be seen if this deposition will actually occur.**

This sequence of events reflects a deliberate pattern of avoidance, misdirection, and obstruction.

## **V. MR. NADEL'S IMPROPER, HOSTILE, AND UNETHICAL ATTACKS ON ME AS A PRO SE LITIGANT**

In addition to the misrepresentations regarding Plaintiff's health, Mr. Nadel has engaged in a pattern of aggressive, intimidating, and threatening behavior aimed at me, Richard M. Silanskas Jr., a Pro Se defendant. These actions are documented in my Motion for Protective Order and include:

### **Intimidating communications regarding discovery**

When I initially provided over 1,000 digital files representing my work for Mansion, Mr. Nadel immediately demanded a phone conference. During the conference, he insisted the files were irrelevant, spoke in a threatening and condescending manner. Though I expressed that I believed the files were relevant, I felt intimidated and agreed to continue searching for additional responsive information.

### **Excessive and threatening follow-up**

After I complied and sent over 200 additional files and written responses on November 19, 2025, Mr. Nadel immediately requested another conference on November 20, 2025. He was abrupt. This behavior caused significant emotional distress and a sense of fear for personal repercussions in the litigation.

### **Exploitation of personal circumstances**

On November 20, 2025, I notified all counsel that my availability would be limited due to the sudden and unexpected death of my wife's brother. Mr. Nadel failed to acknowledge this serious personal circumstance and did not respond.

### **Threatening implications regarding Motion filing and deadlines**

On November 25, 2025, I filed a Motion with an impending deadline. Shortly thereafter, at 3:00 PM Central Time, Mr. Nadel sent me an email expressing "surprise" that I had filed the Motion. In his email, Mr. Nadel asserted that I had lied about the sudden and unexpected death of my wife's brother and stated he regarded my conduct as "a refusal to meet and confer" and that he would "proceed accordingly." **I considered these statements extremely threatening and felt in great danger as a Pro-Se litigant.**

Mr. Nadel further asserted that there was an error in my Motion, specifically that I had incorrectly stated that Plaintiff had not provided notice of the subpoena in advance. This error occurred because I had misread an email, due to my limited legal knowledge as a Pro Se litigant.

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Mr. Nadel demanded that I "withdraw" the Motion, giving me a deadline of less than 24 hours to comply.

I immediately prepared an Amended Motion, removing the inaccurate statement entirely and re-filing with the Court in accordance with instructions provided by the Clerk's Office.

It was very disturbing that Mr. Nadel was so concerned with having me "withdraw" the Motion, rather than "Amend" the Motion. The motion.

## **VI. WRITTEN COMMUNICATION REQUEST**

I have formally requested written-only communication from Mr. Nadel to protect myself from intimidation, document all interactions, and ensure accuracy.

## **VII. ATTACHED EVIDENCE**

- Mr. Nadel's letters and emails
- Dr. Garner's medical letter
- My Motion for Protective Order
  
- Bowling-alley photographs of Mr. Bicknell

These documents demonstrate misrepresentation, intimidation, and obstruction.

## **VIII. FORMAL REQUEST FOR INVESTIGATION**

I respectfully request a full investigation into whether Mr. Nadel violated:

- Rule 4.1(a) – truthfulness in statements to others
- Rule 4.4(a) – prohibiting intimidation or undue burden
- Rule 8.4(c) – dishonesty, fraud, deceit, or misrepresentation
- Rule 8.4(d) – conduct prejudicial to justice
- Rule 3.2(a) – prohibiting needless delay

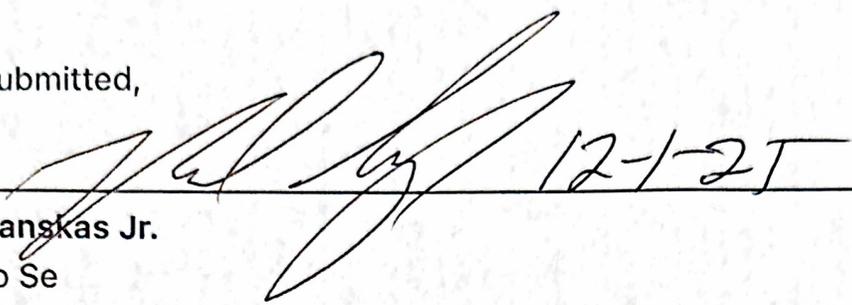
## **IX. SERIOUS QUESTIONS REGARDING ALL MOTIONS AND SUBPOENAS**

Based on the incidents and behavior described, I seriously question the motivation and validity of all motions and subpoenas issued or pursued by Mr. Nadel to date. His conduct suggests a pattern inconsistent with ethical or good-faith litigation practice.

**X. CONCLUSION**

No attorney—regardless of seniority or law-firm prestige—should be permitted to engage in harassment, intimidation, and misrepresentation, especially toward unrepresented litigants. I respectfully request a full investigation and appropriate disciplinary action.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'R. Silanskas Jr.', is written over a horizontal line. To the right of the signature, the date '12-1-25' is handwritten.

**Richard M. Silanskas Jr.**  
Defendant, Pro Se  
1338 Peace In Valley Road  
Blue Eye, Missouri 65611  
(352) 205-5131  
[ricksilanskas@gmail.com](mailto:ricksilanskas@gmail.com)

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Northern District of Oklahoma