

Shannon A. Bertrand  
David R. Cooper  
Heather Z. Cooper<sup>♦</sup>  
John A. Facey, III  
James P.W. Goss  
Rodney E. McPhee  
Harry R. Ryan



**FACEY GOSS & McPHEE P.C.**  
ATTORNEYS AT LAW

John C. Newman (1950-2020)

Antonietta A. Girardi  
Victoria M. Hone\*\*  
Kylie J. Peterson

Paul S. Kulig, Of Counsel

<sup>♦</sup>Also admitted in MA  
\*\* Admitted in MA, NY

Karen E. Nora, Paralegal  
Holly Webb, Paralegal

**Harry R. Ryan, Esq.**

[hryan@fgmvt.com](mailto:hryan@fgmvt.com)

Direct (802) 665-2700

Cell (802) 236-2129

December 14, 2020

**By E-mail Only to [Merrick.Grutchfield@vermont.gov](mailto:Merrick.Grutchfield@vermont.gov)**

Merrick Grutchfield, Program Administrator  
Professional Responsibility Program  
c/o Court Administrator's Office  
109 State Street  
Montpelier, VT 05609-0703

**Re: In re C. Robert Manby, Jr.  
PRB File No. 2019-089**

Dear Ms. Grutchfield:

Please find attached Respondent's Proposed Scheduling Order, together with Certificate of Service in the above-referenced matter.

A ruling on Respondent motion would be helpful to the parties. If Hearing Panel 2 grants the motion, the only remaining allegation for hearing will be that Respondent failed to maintain a normal client-lawyer relationship with EM in violation of V.R.Pr.C. 1.14(a). Identifying what persons might have relevant facts and the need of experts would be more focused following a ruling.

Very truly yours,



Harry R. Ryan

HRR/egs

Enclosures

cc: Sarah Katz, Esq.