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May 4, 2021

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**BY EMAIL:** [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: C. Robert Manby, Jr., Respondent**  
**PRB Docket No. 2019-089**

Dear Merrick:

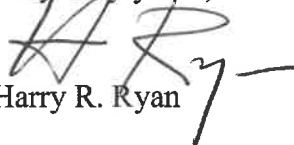
In accordance with the panel's Scheduling Order, Respondent did not provide a witness list in addition to those witnesses listed by Disciplinary Counsel.

With regard to the exhibit list, Respondent has no exhibits at this time. Attached hereto is Disciplinary Counsel's exhibit list which counsel for Respondent has indicated agreement or disagreement with the authenticity and admissibility of each of Disciplinary Counsel's twenty-five proposed exhibits.

Because Dr. Gunther's medical records were produced today, Respondent will request the panel's permission to depose Dr. Gunther. I will be on vacation the last two weeks in May and will not have a chance to review Dr. Gunther's medical records before June.

If the panel allows Dr. Gunther's deposition, Respondent will identify those exhibits which are used in connection with that deposition.

Very truly yours,



Harry R. Ryan

HRR/aml

cc: Sarah Katz, Esq.  
By Email: [Sarah.Katz@vermont.gov](mailto:Sarah.Katz@vermont.gov)

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**Disciplinary Counsel's Exhibit List**  
**In re Manby, PRB File 2019-089**

| Number | Title  | Authenticity Y/N | Admissibility Y/N | Admitted Y/N |
|--------|--|------------------|-------------------|--------------|
|        | Deposition of C. Robert Manby for 33-1-17 Cnev (Nov. 28, 2017)         | YES              | NO                |              |
| DC-2   | Gunther Medical opinion letter for guardianship hrg 6/10/16            | NO               | NO                |              |
| DC-3   | Gunther treatment note 2/12/14   | NO               | NO                |              |
| DC-4   | Letter from C. Robert Manby to JJM dated 4/21/15                       | YES              | YES               |              |
| DC-5   | Deed dated 6/25/15 signed by EM  | YES              | YES               |              |
| DC-6   | Key Bank IRA distribution form dated 6/25/15                           | NO               | NO                |              |
|        | Declaration of Trust listing JJM as the sole beneficiary dated 6/25/15 | YES              | YES               |              |
| DC-8   | Deed dated 9/29/15 signed by EM  | YES              | YES               |              |
| DC-9   | Power of attorney dated 9/29/15 signed by EM                           | YES              | YES               |              |
| DC-10  | Advance health care directive dated 2/4/16 signed by EM                | YES              | YES               |              |
| DC-11  | Revocation of power of attorney for PS dated 3/30/16                   | YES              | YES               |              |
| DC-12  | psychological evaluation of EM 5/9/16                                  | NO               | NO                |              |
| DC-13  | APS investigative report   | NO               | NO                |              |
| DC-14  | 5/7/18 JJM resp to interrogatories                                     | YES              | YES               |              |
| DC-15  | court order revoking adv health care directive                         | NO               | NO                |              |
| DC-16  | email from Nash to Hughes 5/9/16                                       | NO               | NO                |              |
| DC-17  | temp RFA order 8/22/16   | NO               | NO                |              |
| DC-18  | temp guardianship order 4/27/16  | NO               | NO                |              |
| DC-19  | final guardianship order 6/14/16                                       | NO               | NO                |              |
| DC-20  | Decker CV  | NO               | NO                |              |
| DC-21  | Gunther to Hughes email 5/3/17   | NO               | NO                |              |
| DC-22  | JJM deposition 9/18/18   | NO               | NO                |              |
| DC-23  | transcript probate ct 6/14/16  | NO               | NO                |              |
| DC-24  | transcript probate ct 6/20/17  | NO               | NO                |              |
| DC-25  | Manby's EM complete file   | YES              | YES               |              |

STATE OF VERMONT  
PROFESSIONAL RESPONSIBILITY PROGRAM

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

**CERTIFICATE OF SERVICE**

I certify that on May 4, 2021 Disciplinary Counsels was served with C. Robert Manby, Jr.'s (Respondent) witness list and exhibit list at the following address:  
By email to Attorney for the State:

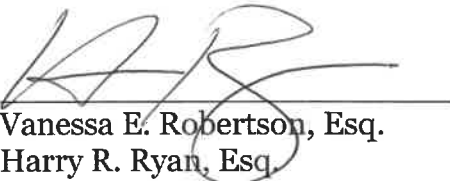
Sarah Katz  
*Disciplinary Counsel*  
Professional Responsibility Program  
(802) 859-3000  
[sarah.katz@vermont.gov](mailto:sarah.katz@vermont.gov)

in accordance with A.O. 9, Rule 14.A and Vermont Rules of Civil Procedure 5.

DATE: May 4, 2021

C. ROBERT MANBY JR.  
Respondent

By:

  
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