

A PROFESSIONAL CORPORATION

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December 3, 2021

E-MAIL

Hearing Panel c/o Merrick Grutchfield, Program Administrator Office of the Court Administrator 109 State Street Montpelier, VT 05609-0701

Re: <u>PRB File Nos. 2019-102 and 2020-011</u>

Dear Panel Members:

Enclosed for filing please find:

- 1. Witness List.
- 2. Exhibit List.
- 3. Special Disciplinary Counsel's Motion *in Limine* to Exclude Testimony About G.A.'s Alleged Behavior Toward Respondent's Paralegal.
- 4. Special Disciplinary Counsel's Motion to Extend the Time for Filing an Amendment to the Petition of Misconduct.

In its April 14, 2021 Scheduling Order, the Panel asked the parties to come up with three mutually agreeable dates for a hearing date in October, to be filed at the same time as their exhibit list and witness list. Since it is unclear exactly which month the hearing will occur under the present schedule, Special Disciplinary Counsel and Respondent have conferred regarding dates in late January and early February and can convey that they and their witnesses are available in February except on February 18 and 22. Special Disciplinary Counsel and Respondent agree the parties will need 4 days for trial. February 1-4, 2022 were dates that worked well for all involved.

In addition, the parties may need to supplement their exhibit lists and ask the Hearing Panel for an addition week, to December 10, 2021 to do so. Special Disciplinary Counsel prepared a supplemental discovery production, but due to an internal miscommunication, the documents were not produced to Mr. Watts until this morning. Neither Special Disciplinary Counsel nor Mr. Watts



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has included documents from this supplemental production in its current exhibit list. The parties ask the panel to provide one additional week to review these documents and provide each other with an updated exhibit list next week. Each party will then provide an amended exhibit list, if appropriate, with these new exhibits added on.

Thank you.

Very truly yours,

GRAVEL & SHEA PC

Navah C. Spero

NCS:lbb

Enclosures

cc: Norman E. Watts, Esq. (e-mail)