STATE OF VERMONT PROFESSIONAL RESPONSIBILITY PROGRAM

In Re: Norman Watts
PRB File Nos. 2019-102 and 2020-011

RESPONDENT'S REPLY TO COUNSEL'S OPPOSITION TO HIS MOTION TO COMPEL A DEPOSITION OF COUNSEL'S SUBSTITUTE EXPERT

EXHIBIT 2:

List of Supplemental Document Production to Counsel, 3/8/22

STATE OF VERMONT PROFESSIONAL RESPONSIBILITY PROGRAM

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RESPONDENT'S LIST OF SUPPLEMENTAL DOCUMENT PRODUCTIONS

Documents Related to Client G.A.

- 1. Deposition Notices
- 2. Deposition Transcripts
- 3. Emails relating to the scheduling of depositions and witnesses
- 4. Emails relating to phone calls with client G.A.

Documents Related to Client J.H.

- 1. Deposition Notices
- 2. Emails and notes relating to the scheduling of depositions
- 3. Witness list and related discussion

WATTS LAW FIRM

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March 8, 2022

VIA EMAIL ONLY

Navah C. Spero, Esq. Special Disciplinary Counsel Gravel & Shea nspero@gravelshea.com

Re: PRB File Nos. 2019-102 and 2020-011

Dear Navah:

I am supplementing my previous document productions alongside this letter. Due to an internal miscommunication, the documents were not produced to you pursuant to your earlier discovery requests.

Please find enclosed documents for clients G.A. and J.H.:

- Documents related to J.H. witness list (2 items)
- Documents related to depositions in the J.H. case, including deposition notices, scheduling emails, and notes (18 items)
- Emails related to phone calls with client G.A. (6 items)
- Documents related to depositions in the G.A. case, including <u>all</u> deposition notices and transcripts, and emails related to the scheduling of witnesses/depositions (35 items)

My paralegal Margaux is sending the productions in four separate batches to limit confusion, but please be in touch if you have any questions.

Thank you.

Sincerely,

/s/Norman E. Watts

Norman E. Watts, Esq.

NW:mr

Enclosures