

STATE OF VERMONT
PROFESSIONAL RESPONSIBILITY BOARD

In Re: Glenn Robinson, Esq.
PRP File No. 2013- 172

Motion in Limine

Disciplinary Counsel asks the Panel to rule that the exhibits identified below are inadmissible for the reasons set out below. The description of the exhibits is taken from Respondent's exhibit list. The copies of the exhibits are those provided by Respondent.

Respondent has not provided Disciplinary Counsel with some of the exhibits on the witness. The exhibits which have not been provided are designated by a "check mark" next to the exhibit. (DC-1) I reserve the right to challenge the admissibility of these documents once I receive them.

Mead

Respondent's I – Docket sheet and affidavit re: Ms. Mead's 1994 conviction for simple assault - (DC-2)- This exhibit is not relevant to the "Mead Count" in the Petition. The conviction, itself, cannot be used to impeach Ms. Mead. Vermont Rule of Evidence (VRE) 609.

Binette

Respondent's AA – "Audio and transcript of a call from Binette to Respondent on July 20, 2017.

- Disciplinary Counsel has not been provided with either the "audio" or the "transcript."
- The AA Disciplinary Counsel has received is an email from Respondent to Atty. McGee and Atty. M. Jerome Diamond on July 20, 2017. (DC-3) This email is inadmissible hearsay. It is also not relevant to the "Binette Counts" in the Petition.

Respondent's BB - "Text exchange between Respondent and Binette October 4, 2014 re apology" (DC-3) – The header information indicates this alleged apology was sent to Atty. McGee by Respondent on October 4, 2014. Ms. Binette has denied writing the text attributed to her. Until Respondent provides copies of the original text with header information identifying Ms. Binette as the author of the apology, the probative value of this document (as authenticated by Respondent) will be "substantially outweighed by the danger of unfair prejudice." VRE 403

Dated at Burlington, Vermont on October 24, 2017

Robert V. Simpson, Jr.
Disciplinary Counsel