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**VIA EMAIL**  
August 29, 2022

Professional Responsibility Board  
Hearing Panel  
Jennifer McDonald, Esq.  
Jonathan T. Rose, Esq.  
Patrick Burke  
*Via Merrick Grutchfield*  
Office of the Court Administrator  
109 State Street  
Montpelier, Vermont 05609-0701  
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Re: PRB-021-2022

Dear Hearing Panel,

The parties received the Scheduling Order issued in this matter on August 17, 2022. We respectfully submit this request on behalf of both parties for several modifications to the schedule. Note that some of the extensions are requested to accommodate the expected maternity leave of Ms. Waite, who is working on this matter with me. She is expected to be out from late October through early March for her leave.

We respectfully request the following amendments to the order:

- Extending the deadline to exchange names and contact information of all persons with knowledge from August 9, 2022 to September 15, 2022.
- Extending the deadline for depositions, if any, from September 18, 2022 to October 15, 2022.
- Adding a deadline of October 3, 2022 for expert witness disclosures by Special Disciplinary Counsel and October 31, 2022 for expert witness disclosures by Respondent.
- Moving up the deadline for witness disclosures and exhibit lists from December 1, 2022 to November 1, 2022, and adding an opportunity for the parties to amend these lists four weeks before the hearing date.
- Moving up the deadline to provide a list of dates for the hearing from December 1, 2022 to November 1, 2022.

- Extending the dates for the hearing to sometime between May 1, 2023 and June 1, 2023.
- Extending the dates for pre-hearing motions to April 15, 2023.

Additionally, Item No. 10 in the current scheduling order references a memorandum addressing “any and all pertinent case law and statutes and Medicaid laws and regulations relevant to Respondent’s assertion of oral trust as a defense.” We believe that language may have come from a different case and request that it be deleted.

I have attached hereto an amended scheduling order reflecting these changes, which have been approved by defense counsel. We sincerely appreciate your consideration of these modifications and are happy to discuss further with the panel, if needed.

Sincerely,

*/s/ Ian P. Carleton*

*/s/ Hannah C. Waite*

Ian P. Carleton  
Hannah C. Waite  
Sheehey Furlong & Behm P.C.

Enclosure