

STATE OF VERMONT
PROFESSIONAL RESPONSIBILITY PROGRAM

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

SPECIAL DISCIPLINARY COUNSEL'S
MOTION TO EXTEND THE TIME FOR FILING HER
SUPPLEMENTAL MEMORANDUM OF LAW ON DISCOVERY SANCTIONS

Navah C. Spero, Esq., Specially Assigned Disciplinary Counsel ("Special Disciplinary Counsel") in this matter, moves to extend the time for filing her Supplemental Memorandum of Law on Discovery Sanctions until on or before October 15, 2021. In support, Special Disciplinary Counsel states as follows:

1. On September 28, 2021, the Hearing Panel issued an order providing Special Disciplinary Counsel with fourteen days to supplement her request for sanctions.
2. Special Disciplinary Counsel wishes to provide such a supplement, but is unable to meet the fourteen day deadline due to a family health issue that arose in the last fourteen days and Special Disciplinary Counsel's work schedule.
3. Special Disciplinary Counsel expects this supplemental filing to be significant and address a broad spectrum of the factual and legal issues that will arise in the case. If the relief requested is granted, this filing has the potential to significantly reduce the scope of the final hearing. As a result, the supplemental filing is also requiring a significant amount of time to prepare.

Conclusion

Based on the foregoing, Special Disciplinary Counsel seeks and extension of time to on or before October 15, 2021 to file her Supplemental Memorandum of Law on Discovery Sanctions.

Dated: Burlington, Vermont
October 12, 2021

/s/ Navah C. Spero

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