

STATE OF VERMONT
PROFESSIONAL RESPONSIBILITY PROGRAM

In re: Norman E. Watts

PRB File Nos. 2019-102 and 2020-011

RESPONDENT'S REPLY TO COUNSEL'S PARTIAL OPPOSITION TO RESPONDENTS
MOTION FOR EXTENSION OF TIME TO FILE ANSWER

RESPONDENT files this Reply to Disciplinary's Partial Opposition to his Motion for Extension of Time to File Answer, as follows:

Respondent respectfully notes that the net effect of Counsel's partial opposition is to provide him with no additional time to prepare a comprehensive answer to Counsel's seven-count, 90-charge petition – given his litigation schedule, without postponing scheduled depositions.

Respondent believes he has a duty to provide the panel with a comprehensive reply. To do so takes time to respond to the lengthy petition. As noted previously, there are over 500 emails to comb through – in addition to the clients' litigation files.

Respondent has depositions, deposition preparation, hearings or mediations on every day from today until the Counsel-proposed deadline, May 7, 2021. Contrary to Counsel's allegation, respondent did not have a two-week advance time to prepare his answer because most of the schedule was filled with similarly crowded litigation events. Rather, respondent had only part of two weekends to prepare his answer.

Absent postponement of client-related depositions, respondent will have no days except part of the weekends and the pre-planned time allocated for visiting disabled relatives.

Counsel implied that respondent purposefully delayed her preliminary investigation. To the contrary, respondent had no such intention; rather, his litigation schedule was crowded in the same manner as his current prospective calendar.

Respondent renews his request for an answer deadline of May 28, 2021 with the note that even that schedule will provide only four additional days for preparation of his answer.

Respectfully submitted on this 7th day of April, 2021.

Respondent,
/s/ N.E.Watts
Norman E. Watts