

STATE OF VERMONT
PROFESSIONAL RESPONSIBILITY PROGRAM

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

CONSENTED-TO MOTION TO SUBSTITUTE EXPERT

Specially Assigned Disciplinary Counsel (“Special Disciplinary Counsel”) moves the Hearing Panel for permission to substitute the expert previously identified on June 4, 2021. In support, Special Disciplinary Counsel states as follows:

On June 4, 2021, Special Disciplinary Counsel identified Herbert Ogden, Esq. as an expert in this matter. After Mr. Ogden was identified, Special Disciplinary Counsel learned that he had a conflict of interest in this matter. Special Disciplinary Counsel promptly sought a replacement expert, and has retained Alison Bell, Esq. to replace Mr. Ogden.

Mr. Watts consents to the requested relief. In addition, because no party has deposed any expert, and no substantive material related to Mr. Ogden was disclosed, there will be no prejudice to Mr. Watts and the substitution will not delay the proceeding.

Based on the foregoing, Special Disciplinary Counsel seeks an order approving a substitution of experts in this matter, and affirming that Ms. Bell will be permitted to testify as an expert.

Dated: Burlington, Vermont
July 9, 2021

/s/ Navah C. Spero

Navah C. Spero, Esq.
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Specially Appointed Counsel

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CERTIFICATE OF SERVICE

I, Navah C. Spero, Esq., certify that, on July 9, 2021, I caused to be served a Consented-

To Motion to Substitute Expert as follows:

Via E-mail

Norman Watts, Esq.
Watts Law Firm, PC
P.O. Box 270
Quechee, VT 05059
nwatts@wattslawvt.com

Dated: Burlington, Vermont
July 9, 2021

/s/ Navah C. Spero

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