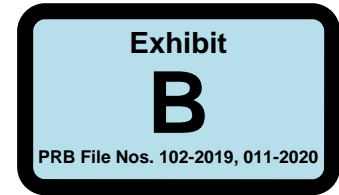


Dalene Sacco

From: Kaveh Shahi
Sent: Tuesday, May 23, 2023 4:39 PM
To: Alexander, Jon
Cc: Navah C. Spero; Dalene Sacco; charlotte dennett
Subject: RE: Alibozek v. Watts



Thanks Jon. We'll consider service accepted and look for the response. I will check with Norm on your previous representation. Just to orient me, when did you become disciplinary counsel (and congrats)?

From: Alexander, Jon <Jon.Alexander@vermont.gov>
Sent: Tuesday, May 23, 2023 4:35 PM
To: Kaveh Shahi <kss@clearyshahi.com>
Cc: Navah C. Spero <nspero@gravelshea.com>; Dalene Sacco <das@clearyshahi.com>; charlotte dennett <chardennettlaw@gmail.com>
Subject: RE: Alibozek v. Watts

Hi Kaveh-

Navah is correct that I would be willing to accept service of the subpoena on her in her capacity as Special Disciplinary Counsel (SDC) only, without waiver of any grounds to quash, modify or seek a protective order. It is my understanding that any documents potentially responsive to the subpoena would have been generated/received in Navah's SDC capacity.

I should note that, while in private practice, I represented your client (along with my then-colleague Jim Cooley) in another matter, Lewis v Watts, 21 CV-02625, which was pending in Windham Civil Division and was dismissed with prejudice in 2/23. I don't believe that this former representation would conflict me from involvement in this one because the two matters do not appear to be substantially related. Of course, if you or Mr. Watts believe otherwise, please let me know right away.

Thanks, Jon



Jon T. Alexander
Disciplinary Counsel, Professional Responsibility Program
Costello Courthouse, 32 Cherry Street, Suite 213
Burlington, VT 05401
(802) 859-3001

From: Navah C. Spero <nspero@gravelshea.com>
Sent: Tuesday, May 23, 2023 3:54 PM
To: Kaveh Shahi <kss@clearyshahi.com>; Dalene Sacco <das@clearyshahi.com>
Cc: charlotte dennett <chardennettlaw@gmail.com>; Alexander, Jon <Jon.Alexander@vermont.gov>
Subject: RE: Alibozek v. Watts

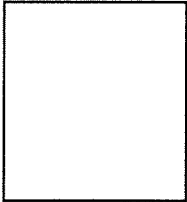
EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Hi Kaveh,

You should hear from Jon Alexander, Disciplinary Counsel, soon. I don't think I'm the right party to serve since I'm acting on behalf of his office on a specially appointed basis.

I've copied him here.

Best,
Navah



Navah C. Spero (she/her) | Shareholder
Gravel & Shea PC

76 St. Paul Street, 7th Floor | P.O. Box 369 | Burlington, VT 05401
T: 802-658-0220 | F: 802-658-1456 | Direct: 802-264-3207
nspero@gravelshea.com | www.gravelshea.com
Biography | Download vCard

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From: Kaveh Shahi <kss@clearyshahi.com>
Sent: Tuesday, May 23, 2023 3:49 PM
To: Navah C. Spero <nspero@gravelshea.com>; Dalene Sacco <das@clearyshahi.com>
Cc: chardennettlaw@gmail.com
Subject: RE: Alibozek v. Watts

Navah,

I have not heard from you re acceptance of service of the subpoena. We'll send it out to the Sheriff for service.

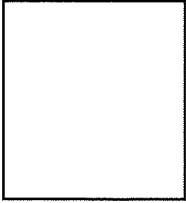
From: Navah C. Spero <nspero@gravelshea.com>
Sent: Friday, May 19, 2023 1:10 PM
To: Dalene Sacco <das@clearyshahi.com>
Cc: Kaveh Shahi <kss@clearyshahi.com>; chardennettlaw@gmail.com
Subject: RE: Alibozek v. Watts

Hi Kaveh,

If permitted to do so, I will accept service of the subpoena subject to preserving all bases to quash or object to it. But, it is not my decision because I am working for Professional Responsibility Program. I contacted disciplinary counsel (Jon Alexander) to get his thoughts but haven't heard back yet. I likely won't have an answer by 3pm because I will be in a meeting starting at 2pm. I hope to have an answer by Monday.

I'm having an issue with my outgoing emails so can you or Dalene please confirm to me that you received this email.

Best,
Navah



Navah C. Spero (she/her) | Shareholder
Gravel & Shea PC

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From: Dalene Sacco <das@clearyshahi.com>
Sent: Thursday, May 18, 2023 3:55 PM
To: Navah C. Spero <nspero@gravelshea.com>
Cc: Kaveh Shahi <kss@clearyshahi.com>; chardennettlaw@gmail.com
Subject: Alibozek v. Watts

Dear Atty Spero,

Attached is a subpoena that Kaveh requests you voluntarily accept, form attached. If we have not received the acceptance by 3 p.m. tomorrow, we will assume you have declined.

Thank you.
Dalene

Dalene A. Sacco
Cleary Shahi & Aicher, P.C.
110 Merchants Row, Ste. 3
Rutland, VT 05701
(802) 775-8800, Ext. 217 ~ phone
(802) 459-1617 ~ Direct Dial
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das@clearyshahi.com

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