

STATE OF VERMONT  
PROFESSIONAL RESPONSIBILITY PROGRAM

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

MOTION TO EXTEND RESPONSE TIME  
TO MOTION FOR DISMISSAL OR ALTERNATIVELY FOR A NEW HEARING

Navah C. Spero, Esq., Special Assigned Disciplinary Counsel (“Special Disciplinary Counsel”), respectfully requests to extend the response time to reply to Respondent’s Motion for Dismissal or Alternatively for a New Hearing (“Motion to Dismiss or New Hearing”), filed July 24, 2023. In support, Special Disciplinary Counsel advises as follows:

Special Disciplinary Counsel seeks an eleven day extension of time to respond to the Motion to Dismiss or New Hearing. Respondent does not cite to any rules authorizing the filing, and therefore it is not clear precisely what the response deadline is. However, Special Disciplinary Counsel has assumed the 14-day deadline in V.R.C.P. 7 applies, making the response deadline August 7. As a result of her schedule, Special Disciplinary Counsel has limited time to effectively respond by the August 7 deadline. Between July 24 and August 7, Special Disciplinary Counsel’s schedule includes taking several party depositions and an all-day, on-site inspection. Also, Special Disciplinary Counsel must prepare for two additional out-of-state party depositions scheduled for August 10 and August 11. As a result of Special Disciplinary Counsel’s commitments, she needs additional time to respond up to and including August 18.

WHEREFORE, Special Disciplinary Counsel respectfully requests the Panel grant her request to extend the time to respond to Respondent's Motion to Dismiss or New Hearing.

Dated: August 2, 2023

/s/ Navah C. Spero

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Specially Assigned Disciplinary Counsel

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CERTIFICATE OF SERVICE

I, Navah C. Spero, certify that, on August 2, 2023, I caused to be served Specially Assigned Disciplinary Counsel's Motion to Extend Response Time to Motion to Dismissal or Alternatively for a New Trial as follows:

Via E-mail

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

Dated: August 2, 2023

/s/ Navah C. Spero

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