

STATE OF VERMONT
PROFESSIONAL RESPONSIBILITY PROGRAM

In re: Norman E. Watts

PRP File Nos. 2019-102 & 2020-011

RESPONDENT'S MEMORANDUM IN SUPPORT
OF MOTION FOR CONTINUANCE

RESPONDENT submits Memorandum in Support of Motion for a Continuance of the Final Hearing submitted by Kaveh S. Shahi, Esq.

Attorney Shahi delineated his reasons for requesting a continuance of the Final Hearing. Respondent supports the Motion for the reasons he expressed – to provide time for him to prepare for the Final Hearing, given the number of claims, the many documents exchanged and the numerous proposed witnesses that he must become familiar with to effectively represent the Respondent.

The Disciplinary Counsel alleges that Attorney Shahi sought the continuance merely to delay the Final Hearing, that he did not need the additional time because his own schedule is flexible and the case is not complex. Attorney Shahi's responses to these allegations is comprehensive and do not need repeating here.

But Disciplinary Counsel also claimed that Respondent retained Attorney Shahi for the purpose of delaying the Final Hearing for his own advantage. She identified no such putative advantage.

There is no nefarious reason for Respondent's request for representation. After months of false accusations about his motivations and conduct, designed to create a negative impression to his disadvantage, Respondent concluded that he needed independent, objective advice and counsel from an attorney with more expertise in dealing with the claims, the evidence, the witnesses and, especially, for the final hearing presentation.

Respondent was frustrated with the continuous flow of false accusations that he purposely refused to produce evidence in discovery when he had produced everything the Disciplinary Counsel requested. (Please refer to the attached "List of Documents Transmitted to Disciplinary Counsel & Related Communications").^{i/}

As the D.C.'s accusations became more personal concerning his motivations for allegedly failing to produce documents, Respondent required a different perspective regarding the false accusations and the proceeding.

Respondent determined that Attorney Kaveh Shahi would provide the vital perspective, expertise and guidance to engage in the process.

As Respondent stressed at today's hearing, there is no benefit for delay – for anyone. But it is vital that he approach the hearing with the guidance and assistance of counsel. It is the only fair, just and reasonable manner to approach the proceeding.

Respondent urges the Panel to Grant Attorney Shahi's Motion for a Continuance.

DATED: May 24, 2023

s/s Norman E. Watts

Respondent

ⁱ / At the hearing, Respondent described his frustration with the technology required to produce hundreds of emails simultaneously.