

STATE OF VERMONT
PROFESSIONAL RESPONSIBILITY BOARD

In re: Carolyn Adams
PRB File No. 2020-064

Disciplinary Counsel's Proposed Scheduling Order

Having been unable to reach agreement with Respondent on proposed dates, disciplinary counsel respectfully requests that the Hearing Panel issue a scheduling order as follows:

1. Requests for production of documents shall be served by February 15, 2021 and responses shall be served by March 1, 2021.
2. The parties shall exchange the names and addresses of all persons having knowledge of relevant facts and/or of witnesses by February 1, 2021.
3. The parties shall disclose any expert witnesses by March 1, 2021.
4. The parties shall disclose any rebuttal expert witnesses by April 1, 2021.
5. All depositions shall be completed by May 1, 2021.
6. All discovery, including all discovery relating to the issue of sanctions, shall be completed by May 1, 2021.
7. Any motion to amend the petition of misconduct shall be filed by May 15, 2021, together with a memorandum setting forth the grounds for the motion.
8. Any pre-hearing motions and supporting memoranda, including any motions in limine, shall be filed by May 15, 2021.
9. On or before June 1, 2021, each party shall file: (a) a witness list identifying each witness the party anticipates calling to testify during the merits hearing, along with a brief summary of the witness's anticipated testimony, and an estimate of the amount of time that will be needed for direct examination; and (b) a list identifying each exhibit the party anticipates presenting at the merits hearing, together with a representation as to whether or not the opposing party stipulates to either authenticity or admissibility of the exhibit or both.

10. Any objection by a party to the hearing panel conducting the merits hearing in this matter remotely by video conferencing, together with a legal memorandum setting forth the grounds for the objection, shall be filed by June 1, 2021.

11. The parties' estimate of the length of time needed for the merits hearing: 1 day.

Dated: January 22, 2021



Disciplinary Counsel