

**STATE OF VERMONT
PROFESSIONAL RESPONSIBILITY PROGRAM**

**IN RE: Carolyn Adams
PRB File No. 2020-064**

RESPONDENT'S MOTION TO ENLARGE

NOW COMES the Respondent, Carolyn Adams, and hereby moves to enlarge, by fourteen (14) days, the time for filing (1) a witness list; and (2) a list identifying each exhibit the party anticipates presenting at the merits hearing.

Respondent strived, by early May, to have a motion for relief filed on related judgments and have a motion heard to delay consideration the pending counts here. Due in part to the limited availability of *pro bono* counsel, those motions were not filed until May 17, 2021, and the scheduling motion for a consolidation or stay has not been decided. Attorney Durell has been assisting in a limited capacity but has had limited availability while on vacation out of state through the end of May. The matter would greatly benefit from his assistance with these deadlines. Attorney Durell has been confirming witnesses this week, and he has provided disciplinary counsel with a preliminary list of exhibits. Respondent is also reviewing Attorney Katz's exhibits with counsel in order to timely respond on admissibility stipulations. Respondent does also intend to reply on the objections recently filed by Attorney Katz within the reply deadline. An enlargement of fourteen (14) days would allow an adequate timeframe for the Respondent to consult with counsel and ensure that her filings that are complete to the point. Attorney Katz has stated that she does not object to a fourteen (14) day extension.

WHEREFORE, Respondent respectfully requests a motion to enlarge be granted for the reasons set forth herein.

DATED at South Ryegate, Vermont this **31st** day of **May 2021**.

/s/ Carolyn Adams
PO Box 151
South Ryegate, VT 05069

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CERTIFICATE OF SERVICE

I, Carolyn Adams, hereby certify that on the **31st** day of **May 2021**, I served **Respondent's Motion to Enlarge** via e-mail to the following attorney of record:

Sarah Katz, Esq.
Sarah.Katz@vermont.gov

DATED at **South Ryegate**, Vermont this **31st** day of **May 2021**.

/s/ Carolyn Adams
PO Box 151
South Ryegate, VT 05069
carri757@gmail.com