

STATE OF VERMONT
PROFESSIONAL RESPONSIBILITY PROGRAM

In Re: Richard K. Bowen, Esq.
PRB File No. 2019-083, 088

Jointly Proposed Scheduling Order

The parties respectfully request that the Hearing Panel approve the following agreed-upon scheduling order:

1. The parties shall exchange the names and contact information of all persons having knowledge of relevant facts and/or of witnesses by August 12, 2019.
2. Requests for production of documents shall be served by August 23, 2019 and responses shall be served by September 23, 2019.
3. The parties shall disclose any expert witnesses by September 23, 2019.
4. The parties shall disclose any rebuttal expert witnesses by October 4, 2019.
5. Any motion requesting bifurcation of this proceeding shall be filed by October 18, 2019, together with a memorandum setting for the grounds for the request.
6. Depositions, if any shall be completed by November 1, 2019.
7. All discovery, including all discovery relating to the issue of sanctions, shall be completed by November 1, 2019.
8. All pre-hearing motions, including any motions in limine, shall be filed by November 15, 2019.
9. On or before November 8, 2019, each party shall file a witness list identifying each witness the party anticipates calling to testify during the merits hearing, along with a brief summary of each witness's anticipated testimony and an estimate of the amount of time

that will be needed for direct examination.

10. On or before November 8, 2019, the parties shall jointly file a consolidated list of all exhibits the parties anticipate offering into evidence at the merits hearing and indicating whether the parties will stipulation to the admission of any exhibit. At the merits hearing, the parties shall provide the panel with four copies of each exhibit that is admitted into evidence, in addition to the original admitted exhibit. The parties shall mark all exhibits they intend to offer into evidence at the hearing.

11. On or before November 8, 2019, the parties shall each file a list of dates between December 2, 2019, and January 10, 2020 on which Respondent and the parties' respective witnesses and counsel are available to attend the merits hearing in this matter.

12. Anticipated hearing length: 1 day


DATED: Aug. 2, 2019



Sarah Katz, Disciplinary Counsel



Richard K. Bowen, Respondent

SO ORDERED:  , Hearing Panel Chair

Dated:

9/26/19