

STATE OF VERMONT
PROFESSIONAL RESPONSIBILITY PROGRAM

In re: Norman E. Watts

PRB File Nos. 2019-102 and 2020-011

RESPONDENT'S MOTION FOR EXTENSION OF TIME TO SUBMIT REVISED
RESPONSES TO REQUESTS FOR PRODUCTION

Respondent moves the Panel for an extension of time to submit his revised responses to requests for production of documents from Special Counsel.

Respondent confirms that the Panel has been lenient with the schedule in this proceeding, which Respondent appreciates. He simply needs more time to work through all the documents already produced, sort them out per the 8/9/21 Panel's Order and prepare to meet with Special Counsel within the time frame the Panel ordered. The ten days that the Panel prescribed for the task is insufficient in the context of Respondent's other client duties and obligations and other responsibilities. The litigation clock continues to click despite the Panel's Order – for previously scheduled mediations and depositions.

Additionally, Respondent serves on the board of trustees of and is an officer of the Quechee Lakes Landowners Association (QLLA), an organization composed of 1,400 residents on 5,500 acres of land. During the 10-day period the Order set, there are also committee and board meetings to prepare for and address.

And, Respondent's neighborhood was recently attacked by a weather phenomenon known as a "microburst" that destroyed hundreds of trees, including many on his property. The conditions are dangerous because many trees were disturbed but not fallen, threatening neighborhood properties. Respondent has been dealing with managers of the cleanup project and QLLA members to accomplish a safe remediation.

Amidst these complicating factors, Respondent has attempted, again, to work through the extraordinary amount of documentation to comply with the Panel's Order. He has been unable to complete the task.

Accordingly, he moves the Panel for an additional week to finalize his review of existing documents and revise his responses to the requests for production.

Under the Order, Respondent must produce his revisions today, 8/19/21. With a pre-deposition conference and a QLLA board meeting scheduled today as well as pre-mediation conferences and, it is virtually impossible to achieve the deadline. Another week – to 8/26/21 (in reality only 2 additional days because of scheduled depositions and a mediation), Respondent can achieve the task.

If the Panel agrees, then, the obligation to meet with Special Counsel for the “meet
-and-review session would occur no later than 8/30/21.

Respectfully Submitted on August 18, 2021.

Respondent,

/S/ N.E. Watts

Norman E. Watts