

STATE OF VERMONT
PROFESSIONAL RESPONSIBILITY PROGRAM

In re: Norman E. Watts

PRP File Nos. 2019-102 and 2020-011

RESPONDENT'S REQUEST FOR ORDER PERMITTING DEPOSITION OF DISCIPLINARY
COUNSEL'S EXPERT WITNESS

Respondent requests that the Panel permit him to take the deposition of the Disciplinary Counsel's expert witness.

By order the Panel previously agreed that Respondent may take the DC's expert's deposition. The DC has designated Allison Bell, Esq., as her expert witness. Because of serious impending deadlines confronting him during the week of the scheduled deposition, Respondent could not take the deposition by the designated date. (3/3/23 email attached).

Respondent notified the DC of his scheduling complications in a timely manner and requested an additional deposition date. By the time Respondent's scheduling complications presented, an alternative date for the deposition was beyond the Panel's deadline. When the Panel announced that the hearing date would be established later in the year. As there was ample additional time for the deposition ahead of the hearing, Respondent's request for a new deposition date was reasonable.

Rather than cooperate with Respondent for a new expert deposition date, given the new hearing schedule, the DC rejected his request expressing a necessity to adhere to the deadline established for the deposition when the hearing was probable in March or April 2023.

In the interests of fairness, Respondent respectfully requests that the Panel permit him to take the expert's deposition prior to the end of April.

DATED: April 10, 2023.

NORMAN E. WATTS

Respondent

/s/ Norman E. Watts

c: Navah Spero, Esq.



Norman Watts <nwatts@wattslawvt.com>

PRB CASE

2 messages

Norman Watts <nwatts@wattslawvt.com>
To: "Navah C. Spero" <nspero@gravelshea.com>

Fri, Mar 3, 2023 at 1:30 PM

Navah - Given that the panel will not hear these cases until late May at the earliest, I am postponing the attorney Bell's deposition, now scheduled for 3/10. I have several deadlines to meet next week and they will distract from my preparation for Ms. Bell's deposition. She deserves my full attention,
Best Regards,
NWatts

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Navah C. Spero <nspero@gravelshea.com>
To: Norman Watts <nwatts@wattslawvt.com>

Fri, Mar 3, 2023 at 2:29 PM

Norman,

I'm on vacation right now but wanted to let you know I don't agree to an indefinite extension of attorney Bell's deposition. We already accommodated scheduling issues by agreeing to push the date to mid March.

You can seek additional relief from the panel but I'll only produce Alison on March 10.

Best,
Navah

Sent from my Android

**Navah C. Spero** (she/her) | *Shareholder*
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