

STATE OF VERMONT
PROFESSIONAL RESPONSIBILITY PROGRAM

In re: Norman E. Watts

PRB File Nos. 2019-102 and 2020-011

RESPONDENTS NOTICE TO THE PANEL

Respondent notifies the Panel that he has been unable to maintain the schedule it ordered for this proceeding, despite diligent efforts to do so and despite the Panel's flexibility and patience with his delays in producing documents requested by the Disciplinary Counsel.

As reported previously, Respondent's litigation schedule is heavy and it leaves very little time for other events or efforts. Respondent apologizes to the Panel – and to Disciplinary Counsel -- if his production delays have caused inconvenience or distraction to either.

Despite recent discovery responsibilities of his litigation demands, Respondent has worked on Counsel's requests – actually, all last weekend. As with last week's several depositions and a mediation, Respondent is balancing his duties to current clients with reviewing and organizing Counsel's forty requests. He does not wish to compound the disciplinary current claims against him with new claims from current clients or the courts.

On the positive side, Respondent's continued work on the discovery has reduced the disputes with Counsel to one issue: The request for income statements. Presumably, the parties will be filing briefs on the subject.

Respondent indicated to Counsel that he doubts he can produce the document package to her this week given the scheduled depositions. His goal is to finalize the package over the upcoming weekend and delivery them early next week.

Respectfully submitted on this 30th day of August, 2021.

/S/ N. E. Watts

Norman E. Watts,

Respondent