

STATE OF VERMONT
PROFESSIONAL RESPONSIBILITY PROGRAM

In Re: Norman Watts
PRB File Nos. 2019-102 and 2020-011

EXHIBIT LIST

Ex. #	Date	Description	Authentic?	Admissible?
<i>Audit Documents</i>				
1	12/19/2018	Compliance Audit Report by Michelle Kainen	Y	N
2	12/20/2018	E-mail from Watts to Kainen re: thank you for audit results	Y	N
3	2/12/2019	Letter from Watts to Katz re: audit	Y	N
4	9/16/2020	Second Compliance Audit Report by Michelle Kainen	Y	N
5		IOLTA Check Register	Y	N
6		IOLTA Transaction Detail	Y	N
7	5/18/2017	C.V. Engagement Letter	Y	N
8	4/30/2019	E-mail from Reckard to Watts re: C.V. settlement funds	Y	N
9	5/9/2019	E-mail from Reckard to Watts re: remaining account funds for C.V.	Y	N
<i>PRB Documents</i>				
10	2/21/2019	Stipulation of Facts and Conclusions of Law	Y	N
11	4/18/2019	PRB No. 2019-006, Decision #224	Y	N
<i>G.A. Documents</i>				
12	8/4/2017	Engagement Letter	Y	Y
13	10/16/2017	E-mails between Reckard and G.A. re: billing	Y	Y

Ex. #	Date	Description	Authentic?	Admissible?
14	10/26/2017	Deposition of G.A. cover page	Y	Y
15	3/21/2018	E-mail from Reckard to G.A. re: billing and depositions	Y	Y
16	3/27/2018	E-mails between Watts and G.A. re: billing	Y	Y
17	4/4/2018	E-mails between Reckard and G.A. re: billing	Y	Y
18	5/30/2018	E-mails between Watts and G.A. re: billing and depositions	Y	Y
19	5/30/2018	E-mails between Reckard and G.A. re: billing	Y	Y
20	5/30/2018	E-mails between Reckard and G.A. re: billing	Y	Y
21	5/31/2018	E-mails between Reckard and G.A. re: billing	Y	Y
22	6/13/2018	E-mail from Watts to G.A. re: confidence in legal team	Y	Y
23	8/30/2018	E-mails between Reckard and G.A. re: billing	Y	Y
24	10/15/2018	E-mail from Watts to G.A. re: Motion for Judgment on the Pleadings and billing	Y	Y
25	10/17/2018	E-mail from Watts to Reckard re: \$2,500 fund transfer 9/10/2018	Y	Y
26	10/17/2018	E-mail from Reckard to S.A. re: verification of \$2,500 payment	Y	Y
27	10/18/2018	E-mails between Reckard and S.A. re: record of checks sent	Y	Y
28	10/23/2018	E-mail from Reckard to G.A. re: billing and summary judgment motions	Y	Y
29	10/26/2018	E-mail from Watts to G.A. re: payment needed to continue work on case	Y	Y
30	11/9/2018	E-mail from Reckard to G.A. re: billing statement	Y	Y

Ex. #	Date	Description	Authentic?	Admissible?
31	11/30/2018	E-mails from Watts and Reckard to G.A. re: summary judgment filing and dismissal of Count 2	Y	Y
32	12/7/2018	E-mail from G.A. to Watts re: appreciate insight	Y	Y
33	12/12/2018	E-mails between Reckard and G.A. re: billing	Y	Y
34	1/11/2019	E-mail from Reckard to G.A. re: billing	Y	Y
35	2/3/2019	E-mails between Watts and G.A. re: billing and upcoming hearing	Y	Y
36	2/4/2019	E-mail from Reckard to G.A. re: rescheduling summary judgment hearing	Y	Y
37	2/12/2019	E-mails between Reckard and S.A. re: billing	Y	Y
38	5/10/2019	Docket Sheet for G.A. v. Defendant	Y	Y
39		Pleadings Index for G.A. v. Defendant	Y	Y
40	10/15/2018	Defendant's Motion for Judgment on the Pleadings for Count Two - Breach of Implied Covenant of Good Faith and Fair Dealing	Y	Y
41	10/15/2018	Defendant's Motion for Partial Summary Judgment on Count One - Breach of Implied Contract and Count Three - Age Discrimination	Y	Y
42	10/15/2018	Defendant's Statement of Undisputed Material Facts in Support of Motion for Partial Summary Judgment on Counts One and Three	Y	Y
43	11/23/2015	G.A.'s Memorandum in Opposition to Defendant's Motion for Partial Summary Judgment	Y	Y
44	11/23/2015	G.A.'s Statement of Disputed Facts for Trial in Response to Defendant's Statement of Undisputed Facts	Y	Y
45	7/19/2019	G.A.'s Complaint against Watts	Y	Y

Ex. #	Date	Description	Authentic?	Admissible?
46	9/24/2019	Letter from PRB to G.A. reversing dismissal of complaint	Y	Y
47	9/30/2019	Letter from Kennedy to Spero re: assignment as Special Disciplinary Counsel for complaint by G.A.	Y	Y
48	3/20/2020	E-mail from Reckard to Spero re: complete G.A. billing file and communications related to billing	Y	Y
49	7/14/2020	Letter from Spero to Watts re: request for additional documents	Y	Y
50	7/24/2020	Letter from Watts to Spero re: response to 7/14/2020 request for additional documents	Y	Y
51	8/6/2020	Letter from Spero to Watts re: follow-up questions to 7/24/2020 letter	Y	Y
52	8/6/2020	Record of creation of payee for G.A. on 8/6/2020 for retainer refund	Y	Y
53	8/7/2020	E-mail from G.A. to Spero forwarding e-mail from Watts re: retainer	Y	Y
54	8/14/2020	E-mail from Watts to Spero re: response to 8/6/2020 letter	Y	Y
55	8/26/2020	Check to G.A. returning retainer	Y	Y
56		Client I Spreadsheet	Y	Y
57		Complete Billing File for G.A.	Y	Y
<i>J.H. Documents</i>				
58	4/28/2014	E-mail from Watts to J.H. re: early estimate	Y	Y
59	5/3/2014	Tentative Estimate	Y	Y
60	5/5/2014	E-mail from Watts to J.H. re: estimate	Y	Y
61	5/6/2014	E-mail from Watts to J.H. re: high estimate	Y	Y

Ex. #	Date	Description	Authentic?	Admissible?
62	5/7/2014	E-mail from Watts to J.H. re: case for retaliation	Y	Y
63	5/13/2014	Engagement Letter	Y	Y
64	2/9/2015	E-mail from J.H. to Watts re: request for revised estimate	Y	Y
65	2/10/2015	E-mail from Watts to J.H. re: revised estimate	Y	Y
66	2/13/2015	E-mail from Watts to J.H. re: revised estimate	Y	Y
67	2/17/2015	E-mail from J.H. to Watts re: consultation check and request for credit	Y	Y
68	2/25/2015	E-mail from Watts to J.H. re: billing for travel	Y	Y
69	2/28/2015	E-mail from J.H. to Watts re: summary of conversation (case assessment) and discovery responses	Y	N
70	3/11/2015	E-mails between Watts and J.H. re: error on billing statement	Y	Y
71	3/31/2015	E-mails between Watts and J.H. re: Dr. Minnich's evaluation and sharing with Dr. Harvey	Y	Y
72	6/2/2015	Expert Bill from Paul Harvey, Ph.D.	Y	N
73	6/17/2015	E-mail from Watts to J.H. re: emotional distress damages and signing deposition transcript		
74	7/9/2015	E-mail from Watts to J.H. re: travel time	Y	Y
75	8/6/2015	E-mails between Watts and J.H. re: request for estimate of travel costs for depositions	Y	N
76	8/10/2015	Dartmouth Coach receipts for bus tickets	Y	Y
77	9/18/2015	E-mail from J.H. to Watts re: request for updated estimate	Y	Y
78	9/19/2015	E-mail from Watts to J.H. re: updated trial expenses estimate	Y	N

Ex. #	Date	Description	Authentic?	Admissible?
79	10/1/2015	E-mail from Watts to J.H. re: responding to questions from 9/19/2015	Y	N
80	6/6/2016	E-mails between Watts and J.H. re: \$650 credit for work compelling discovery	Y	Y
81	9/13/2016	Memo for WLF Personnel File re: thank you to Watts	Y	Y
82	11/14/2016	E-mail from J.H. to Watts re: appeal fees	Y	N
83	5/23/2017	E-mails between Watts and J.H. re: end of case, refund, and retainer	Y	Y
84	5/30/2017	E-mails between Watts and J.H. re: accounting and retainer	Y	Y
85	6/1/2017	E-mail from Watts to J.H. re: accounting and retainer refund	Y	Y
86	6/20/2017	E-mails between Watts and J.H. re: retainer	Y	Y
87	8/28/2017	E-mails between Watts and J.H. June-August 2017 re: accounting statement, travel expenses, and retainer	Y	Y
88	9/19/2017	Check to J.H. returning retainer	Y	Y
89	12/2/2017	J.H.'s Complaint against Watts	Y	Y
90	1/23/2018	Receipt for Legal Services January to August 2017	Y	Y
91	7/5/2018	J.H.'s Supplemental Complaint against Watts	Y	Y
92	6/19/2019	Letter from Kennedy to Watts re: complaint filed by J.H.	Y	Y
93	7/29/2019	Letter from Watts to Katz re: response to J.H. complaint	Y	Y
94	9/5/2019	Letter from Kennedy to Spero re: appointment as disciplinary counsel	Y	Y
95	10/23/2019	Docket Sheet for J.H. v. Defendant	Y	Y

Ex. #	Date	Description	Authentic?	Admissible?
96	7/2/2014	J.H.'s Complaint	Y	Y
97	9/26/2014	J.H.'s Amended Complaint	Y	Y
98	3/11/2015	Revised Stipulated Discovery Schedule Order	Y	Y
99	11/5/2015	J.H.'s Memorandum in Opposition to Defendant's Motion for Summary Judgment	Y	Y
100	11/5/2015	J.H.'s Response to Defendant's Statement of Undisputed Facts and J.H.'s Statement of Disputed Facts	Y	Y
101	11/5/2015	J.H.'s Exhibits to Memorandum in Opposition to Motion for Summary Judgment and Response to Statement of Undisputed Facts	Y	Y
102	4/22/2016	Opinion and Order Granting Defendant's Motion for Summary Judgment	Y	Y
103		Complete Billing File for J.H.	Y	Y