

STATE OF VERMONT
PROFESSIONAL RESPONSIBILITY PROGRAM

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

REVISED 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	12/11/2017	E-mail from Reckard to G.A. re: depositions		
16	2/20/2018	E-mails between Reckard and G.A. re: billing and depositions		
17	3/21/2018	E-mail from Reckard to G.A. re: billing and depositions	Y	Y
18	3/27/2018	E-mails between Watts and G.A. re: billing	Y	Y
19	4/4/2018	E-mails between Reckard and G.A. re: billing	Y	Y
20	5/30/2018	E-mails between Watts and G.A. re: billing and depositions	Y	Y
21	5/30/2018	E-mails between Reckard and G.A. re: billing	Y	Y
22	5/30/2018	E-mails between Reckard and G.A. re: billing	Y	Y
23	5/31/2018	E-mails between Reckard and G.A. re: billing	Y	Y
24	6/8/2018	E-mail from Reckard to G.A. re: billing		
25	6/13/2018	E-mail from Watts to G.A. re: confidence in legal team	Y	Y
26	8/30/2018	E-mails between Reckard and G.A. re: billing	Y	Y
27	10/15/2018	E-mail from Watts to G.A. re: Motion for Judgment on the Pleadings and billing	Y	Y
28	10/15/2018	E-mails between Reckard and G.A. re: motions for summary judgment and judgment on the pleadings		
29	10/15/2018	E-mails between Reckard and G.A. re: billing and summary judgment		
30	10/17/2018	E-mail from Watts to Reckard re: \$2,500 fund transfer 9/10/2018	Y	Y
31	10/17/2018	E-mail from Reckard to S.A. re: verification of \$2,500 payment	Y	Y

Ex. #	Date	Description	Authentic?	Admissible?
32	10/18/2018	E-mails between Reckard and S.A. re: record of checks sent	Y	Y
33	10/23/2018	E-mail from Reckard to G.A. re: billing and summary judgment motions	Y	Y
34	10/26/2018	E-mail from Watts to G.A. re: payment needed to continue work on case	Y	Y
35	10/27/2018	E-mails between Watts and G.A. re: payment needed and check sent		
36	11/9/2018	E-mail from Reckard to G.A. re: billing statement	Y	Y
37	11/30/2018	E-mails from Watts and Reckard to G.A. re: summary judgment filing and dismissal of Count 2	Y	Y
38	12/7/2018	E-mail from G.A. to Watts re: appreciate insight	Y	Y
39	12/12/2018	E-mails between Reckard and G.A. re: billing	Y	Y
40	12/12/2018	E-mails from Watts and Reckard to G.A. re: billing		
41	1/11/2019	E-mail from Reckard to G.A. re: billing	Y	Y
42	1/31/2019	E-mails between Watts and G.A. re: billing		
43	2/3/2019	E-mails between Watts and G.A. re: billing and upcoming hearing	Y	Y
44	2/4/2019	E-mail from Reckard to G.A. re: rescheduling summary judgment hearing	Y	Y
45	2/12/2019	E-mails between Reckard and S.A. re: billing	Y	Y
46	5/10/2019	Docket Sheet for G.A. v. Defendant	Y	Y
47		Pleadings Index for G.A. v. Defendant	Y	Y

Ex. #	Date	Description	Authentic?	Admissible?
48	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
49	10/15/2018	Defendant's Motion for Partial Summary Judgment on Count One - Breach of Implied Contract and Count Three - Age Discrimination	Y	Y
50	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
51	11/23/2015	G.A.'s Memorandum in Opposition to Defendant's Motion for Partial Summary Judgment	Y	Y
52	11/23/2015	G.A.'s Statement of Disputed Facts for Trial in Response to Defendant's Statement of Undisputed Facts	Y	Y
53	7/19/2019	G.A.'s Complaint against Watts	Y	Y
54	9/24/2019	Letter from PRB to G.A. reversing dismissal of complaint	Y	Y
55	9/30/2019	Letter from Kennedy to Spero re: assignment as Special Disciplinary Counsel for complaint by G.A.	Y	Y
56	3/20/2020	E-mail from Reckard to Spero re: complete G.A. billing file and communications related to billing	Y	Y
57	7/14/2020	Letter from Spero to Watts re: request for additional documents	Y	Y
58	7/24/2020	Letter from Watts to Spero re: response to 7/14/2020 request for additional documents	Y	Y
59	8/6/2020	Letter from Spero to Watts re: follow-up questions to 7/24/2020 letter	Y	Y
60	8/6/2020	Record of creation of payee for G.A. on 8/6/2020 for retainer refund	Y	Y

Ex. #	Date	Description	Authentic?	Admissible?
61	8/7/2020	E-mail from G.A. to Spero forwarding e-mail from Watts re: retainer	Y	Y
62	8/14/2020	E-mail from Watts to Spero re: response to 8/6/2020 letter	Y	Y
63	8/26/2020	Check to G.A. returning retainer	Y	Y
64		Client I Spreadsheet	Y	Y
65		Complete Billing File for G.A.	Y	Y
<i>J.H. Documents</i>				
66	4/28/2014	E-mail from Watts to J.H. re: early estimate	Y	Y
67	5/3/2014	Tentative Estimate	Y	Y
68	5/5/2014	E-mail from Watts to J.H. re: estimate	Y	Y
69	5/6/2014	E-mail from Watts to J.H. re: high estimate	Y	Y
70	5/7/2014	E-mail from Watts to J.H. re: case for retaliation	Y	Y
71	5/13/2014	Engagement Letter	Y	Y
72	6/23/2014	E-mails between Watts and J.H. re: meeting and witness list		
73	8/20/2014	E-mail from Watts to J.H. re: deposition witnesses		
74	1/29/2015	E-mail from Watts to J.H. re: hiring Paul Harvey, PhD as expert		
75	2/3/2015	E-mail from Watts to J.H. re: reasonableness of expert fees and estimate		
76	2/9/2015	E-mail from J.H. to Watts re: request for revised estimate	Y	Y
77	2/10/2015	E-mail from Watts to J.H. re: revised estimate	Y	Y
78	2/13/2015	E-mail from Watts to J.H. re: revised estimate	Y	Y

Ex. #	Date	Description	Authentic?	Admissible?
79	2/17/2015	E-mail from J.H. to Watts re: consultation check and request for credit	Y	Y
80	2/25/2015	E-mail from Watts to J.H. re: billing for travel	Y	Y
81	2/28/2015	E-mail from J.H. to Watts re: summary of conversation (case assessment) and discovery responses	Y	N
82	2/28/2015	E-mail from Watts to J.H. re: teleconference and case assessment summary of discussion		
83	3/11/2015	E-mails between Watts and J.H. re: error on billing statement	Y	Y
84	3/22/2015	Dartmouth Coach Bus Schedule as of March 22, 2015		
85	3/31/2015	E-mails between Watts and J.H. re: Dr. Minnich's evaluation and sharing with Dr. Harvey	Y	Y
86	6/2/2015	Expert Bill from Paul Harvey, Ph.D.	Y	N
87	6/17/2015	E-mail from Watts to J.H. re: emotional distress damages and signing deposition transcript		
88	7/9/2015	E-mail from Watts to J.H. re: travel time	Y	Y
89	8/6/2015	E-mails between Watts and J.H. re: request for estimate of travel costs for depositions	Y	N
90	8/6/2015	E-mails between Watts and J.H. re: depositions and cost estimate		
91	8/10/2015	Dartmouth Coach receipts for bus tickets	Y	Y
92	9/18/2015	E-mail from J.H. to Watts re: request for updated estimate	Y	Y
93	9/19/2015	E-mail from Watts to J.H. re: updated trial expenses estimate	Y	N
94	10/1/2015	E-mail from Watts to J.H. re: responding to questions from 9/19/2015	Y	N

Ex. #	Date	Description	Authentic?	Admissible?
95	11/7/2015	E-mails between Watts and J.H. re: motions to stay and compel, cost estimate, and discovery deadlines		
96	2/21/2016	E-mail from Watts to J.H. re: responses to questions		
97	6/6/2016	E-mails between Watts and J.H. re: \$650 credit for work compelling discovery	Y	Y
98	9/13/2016	Memo for WLF Personnel File re: thank you to Watts	Y	Y
99	11/14/2016	E-mail from J.H. to Watts re: appeal fees	Y	N
100	5/23/2017	E-mails between Watts and J.H. re: end of case, refund, and retainer	Y	Y
101	5/30/2017	E-mails between Watts and J.H. re: accounting and retainer	Y	Y
102	6/1/2017	E-mail from Watts to J.H. re: accounting and retainer refund	Y	Y
103	6/20/2017	E-mails between Watts and J.H. re: retainer	Y	Y
104	8/28/2017	E-mails between Watts and J.H. June-August 2017 re: accounting statement, travel expenses, and retainer	Y	Y
105	9/19/2017	Check to J.H. returning retainer	Y	Y
106	12/2/2017	J.H.'s Complaint against Watts	Y	Y
107	1/23/2018	Receipt for Legal Services January to August 2017	Y	Y
108	7/5/2018	J.H.'s Supplemental Complaint against Watts	Y	Y
109	6/19/2019	Letter from Kennedy to Watts re: complaint filed by J.H.	Y	Y
110	7/29/2019	Letter from Watts to Katz re: response to J.H. complaint	Y	Y

Ex. #	Date	Description	Authentic?	Admissible?
111	9/5/2019	Letter from Kennedy to Spero re: appointment as disciplinary counsel	Y	Y
112	10/23/2019	Docket Sheet for J.H. v. Defendant	Y	Y
113	7/2/2014	J.H.'s Complaint	Y	Y
114	9/26/2014	J.H.'s Amended Complaint	Y	Y
115	3/11/2015	Revised Stipulated Discovery Schedule Order	Y	Y
116	11/5/2015	J.H.'s Memorandum in Opposition to Defendant's Motion for Summary Judgment	Y	Y
117	11/5/2015	J.H.'s Response to Defendant's Statement of Undisputed Facts and J.H.'s Statement of Disputed Facts	Y	Y
118	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
119	4/22/2016	Opinion and Order Granting Defendant's Motion for Summary Judgment	Y	Y
120		Complete Billing File for J.H.	Y	Y
121		Google Maps Printout for 19 Central Street, Woodstock, VT to Burlington, VT		
122		Google Maps Printout for 19 Central Street, Woodstock, VT to Montpelier, VT		
123		Google Maps Printout for 19 Central Street, Woodstock, VT to Concord, NH		