

STATE OF VERMONT
PROFESSIONAL RESPONSIBILITY PROGRAM

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

LIST OF WITNESSES FOR TRIAL

Specially Appointed Disciplinary Counsel, Navah C. Spero (“Special Disciplinary Counsel”), identifies the following witnesses she anticipates calling to testify during the upcoming merits hearing.

Witnesses

1. Michelle Kainen, Esq., MSA – Special Disciplinary Counsel anticipates Ms. Kainen will testify about the two audits she performed on Mr. Watts’ IOLTA account. She will testify about Mr. Watts’ record keeping practices, handling of client funds, and the status of his accounts. Ms. Kainen will also testify about written and oral conversations she had with Mr. Watts about these issues.
2. G.A. – G.A. will testify about all aspects of his engagement of Mr. Watts that are relevant to this case. This includes the handling of his retainer, the communications from Mr. Watts’ office regarding outstanding fees, and the lack of communications from Mr. Watts’ office regarding the motion for judgment on the pleadings. G.A. will also rebut Mr. Watts’ defenses and factual claims.
3. S.A. – S.A. is G.A.’s wife. She will testify about communications from Mr. Watts’ office related to the motion for judgment on the pleadings and the retainer. S.A. will also rebut Mr. Watts’ defenses and factual claims.
4. J.H. – J.H. will testify about all aspects of her engagement of Mr. Watts that are relevant to this case. Specifically, she will testify about the estimates she was provided, the cost of her case and the handling of her retainer.
5. Norman Watts, Esq. – Mr. Watts will be questioned on all aspects of this case, including the allegations set forth in the Petition for Misconduct and the evidence relevant to sanctions.

Expert Witness

1. Alison Bell, Esq. – Ms. Bell will provide an expert opinion on Mr. Watts’ estimates for J.H. She will opine that Mr. Watts’ estimates did not provide the client with accurate and complete information regarding the potential cost of her

litigation. Ms. Bell will testify that Mr. Watts' estimates were misleading and unreasonable because many of the amounts listed in the estimate for the various phases of litigation were not feasible. She will further testify that the estimates and accompanying e-mails did not appropriately and accurately explain the range of possible fees and expenses, and did not explain to J.H. the uncertainties that could affect the total cost of the litigation.

Dated: Burlington, Vermont
December 3, 2021

/s/ Navah C. Spero

Navah C. Spero, Esq.

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