

STATE OF VERMONT
PROFESSIONAL RESPONSIBILITY BOARD

In re: Norman Watts, Esq.

PRB File Nos. 2019-102 - 2020-011

RESPONDENT'S REQUESTS FOR PRODUCTION OF DOCUMENTS

The Respondent issues the following Requests for Production of Documents to Disciplinary Counsel to be produced pursuant to the Panel's Scheduling Order:

1. Please produce all documents received from the complainants.
2. Please produce all written communications between complainants and Disciplinary Counsel, including electronic and paper communications.
3. Please produce all notes, records and memoranda based on or derived from communications between complainants and Disciplinary Counsel, including electronic and paper communications prepared before, during or after all such communications.
4. Please produce all notes, records and memoranda based on or derived from communications between Respondent and Disciplinary Counsel, including electronic and paper communications prepared before, during or after all such communications.
5. Please produce all documents received from any Vermont attorney concerning and/or related to the complaints from complainants.
6. Please produce all documents received from any Vermont attorney concerning and/or related to the Petition for Misconduct.

7. Please produce all documents received from any official of the Professional Responsibility Board concerning or related to the complaints from complainants.
8. Please produce all notes, records and memoranda based on or derived from communications between Disciplinary Counsel and any Vermont attorney concerning and/or related to the complaints from complainants.
9. Please produce all documents received from any official of the Professional Responsibility Board concerning or related to the Petition of Misconduct.
10. Please produce all notes, records and memoranda based on or derived from communications between Disciplinary Counsel and any Vermont attorney concerning and/or related to the complaints from complainants.
11. Please produce all documents received from any official of the Professional Responsibility Board concerning or related to the Petition of Misconduct.
12. Please produce all notes, records and memoranda based on or derived from communications between Disciplinary Counsel and any Vermont attorney concerning and/or related to the Respondent.
13. Please produce all documents received from any official of the Professional Responsibility Board concerning or related to the Respondent.
14. Please produce the docket number and parties' names of all disciplinary cases that Disciplinary Counsel has prosecuted in the last ten years.
15. Please identify any expert witness that Disciplinary Counsel intends to present in this matter, together with the proposed expert's curriculum vitae.

I certify that, on this date, I served the Respondents Requests for Documents on the Disciplinary Counsel via electronic mail.

DATED AT Quechee VT on this 26th day of 2021.

Respondent,

A handwritten signature in black ink, appearing to read "M. S. [unclear]", written above a horizontal line.
