



STATE OF VERMONT  
PROFESSIONAL RESPONSIBILITY PROGRAM

**In Re: Norman Watts**

**PRB Files No. 2019-102 & No. 2020-011**

**Exhibit List for Norman E. Watts, Esq.**

Exhibit 1	7/29/19 – Watts Law Firm (“WLF”) to Katz, letter & accompanying documents for J.H.: <ul style="list-style-type: none"> <li>- Exhibit 1: 7/19/19 Kennedy letter;</li> <li>- Exhibit 2: SJM opposition memo;</li> <li>- Exhibit 3: Opinion &amp; Order granting SJM;</li> <li>- Exhibit 4: WLF billing totals for JH, 2014 – 2017</li> </ul>	72 pp.
Exhibit 2	12/20/19 – WLF to Spero email with 4 requested categories of documents for J.H.: <ul style="list-style-type: none"> <li>- Complete billing file, including monthly itemized statements;</li> <li>- All filings related to SJM (Memo in Opposition to SJM; Statement of Facts; COS: Exhibits 1 – 60; Docket Sheet);</li> <li>- All emails (8) between WLF &amp; JH re: estimates for damages &amp; likelihood of success.</li> </ul>	674 pp.
Exhibit 3	7/24/20 – WLF letter to Spero and 2/5/15 bill for J.H.	6 pp.
Exhibit 4	7/24/20 – WLF follow-up letter to Spero, with appellate brief for J.H.	90 pp.
Exhibit 5	3/20/20 – WLF email to Spero with documents related to client G.A.: <ul style="list-style-type: none"> <li>- All WLF emails with client regarding billing, from October 2017 to February 2019;</li> <li>- Client’s complete billing file (all itemized monthly statements, payments).</li> </ul>	84 pp.
Exhibit 6	6/30/20 – WLF email to Spero, with documents related to client G.A.: <ul style="list-style-type: none"> <li>- WLF’s Pleading Index for G.A. vs. G.E.;</li> <li>- GE’s Motion for Judgment on the Pleadings on Count Two;</li> <li>- GE’s Motion for Partial SJ;</li> <li>- GE’s Statement of Facts;</li> <li>- WLF’s SJM Opposition Memo;</li> <li>- WLF’s Statement of Facts; and</li> <li>- WLF’s Exhibits 1 – 11 of Statement of Facts.</li> </ul>	564 pp.
Exhibit 7	6/30/20 – WLF emails Spero a spreadsheet of complete billing file for G.A. (repeat of production from 3/20/20)	10 pp.

Exhibit 8	7/24/20 – WLF letter to Spero with all requested documents, including bills, emails, notes related to G.A.: <ul style="list-style-type: none"> <li>- G.A. Retainer Fee Payments;</li> <li>- Emails w/ client re: retainer &amp; outstanding expenses;</li> <li>- Emails with client in Oct/Nov 2018;</li> <li>- 2015 &amp; 2017 WLF notes on intakes.</li> </ul>	27 pp.
Exhibit 9	Affidavit and supporting memo of Garth Dunkel re: client J.H.	4 pp.
Exhibit 10	Other pleadings for G.A.	47 pp.
Exhibit 11	Other pleadings for J.H.	36 pp.

DATED: December 3, 2021.

/s/Norman E. Watts  
Norman E. Watts, Esq.  
Watts Law Firm, PC  
PO Box 270  
176 Waterman Hill Rd, Suite 4  
Quechee, VT 05059  
[nwatts@wattslawvt.com](mailto:nwatts@wattslawvt.com)  
[info@wattslawvt.com](mailto:info@wattslawvt.com)