

HEILMANN, EKMAN, COOLEY & GAGNON, INC.

ATTORNEYS AT LAW
125 COLLEGE STREET, 2ND FLOOR
P.O. BOX 216
BURLINGTON, VERMONT 05402-0216

JAMES M. COOLEY

EVAN A. FOXX

(802) 864-4555 • FAX (802) 864-4659

Of Counsel
ROBIN O. COOLEY
RICHARD H. WADHAMS, JR.
JON T. ALEXANDER

efoxx@healaw.com

March 3, 2023

Professional Responsibility Board
Hearing Panel
Jennifer McDonald, Esq.
Jonathan T. Rose, Esq.
Patrick Burke
Via Merrick Grutchfield
Office of the Court Administrator
109 State Street
Montpelier, Vermont 05609-0701
Merrick.Grutchfield@vermont.gov

Re: PRB-021-2022

Dear Hearing Panel,

Please allow the following letter to serve as Respondent's response to Special Disciplinary Counsel's March 2, 2023 request for a stay. Respondent has no objection and moves to join Special Disciplinary Counsel's request for a stay. The parties have conferred and hereby request that the matter be stayed until April 28, 2023 to allow the parties to negotiate the language of the proposed stipulation of facts, conclusions of law and recommended discipline for the Panel's consideration.

Thank you.

Very truly yours,

/s/Evan Foxx

Evan Foxx

cc: Ian Carleton, Esq. (via email)
Hannah C. Waite, Esq. (via email)
Robin Cooley, Esq. (via email)