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VIA EMAIL
March 2, 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,

The parties have agreed to a settlement in principle and are currently drafting a stipulation of facts and proposed conclusions of law and sanctions to submit to the Panel for review. The parties have agreed to pause discovery while negotiating the language of the stipulation and would like to stay all deadlines in the current schedule until the stipulation is submitted and considered by the Panel. If the parties cannot come to an agreement regarding the language for the stipulation, or the Panel rejects it, the parties will submit a revised scheduling order to proceed with the case at that time. We write to inform the panel of this proposal and request permission to stay discovery.

Should the Panel have any additional questions, please do not hesitate to reach out.

Sincerely,

/s/ Ian P. Carleton
/s/ Hannah C. Waite

Ian P. Carleton
Hannah C. Waite
Sheehey Furlong & Behm P.C.