

STATE OF VERMONT
PROFESSIONAL RESPONSIBILITY BOARD

PRB-124-2022, PRB-076-2023

In re: W. MICHAEL NAWRATH

RESPONDENT'S SUPPLEMENTAL WITNESS DISCLOSURES

NOW COMES the Respondent, W. Michael Nawrath, pursuant to A.O. 9, Rule 19.B(1), and hereby submits the following names and addresses of all persons who may have relevant facts or knowledge of the above-captioned matters.

1. All witnesses disclosed in Special Disciplinary Counsel's *List of Witnesses*, served on December 7, 2023.
2. John Benson, 81 Benson Road, Manchester Center, VT 05255, phone number 802-366-0606.
3. Donna Benson, Benson Road, Manchester Center, VT 05255, phone number 802-366-0606.
4. Brian Benson, 1 Benson Road, Manchester Center, VT 05255, phone number 964-415-2479.
5. Susan Benson, 1 Benson Road, Manchester Center, VT 05255, phone number 964-415-2479.
6. Mary Benson Herba, 400 E. Franklin Street, Fayetteville, NY 13066, phone number 315-440-4786.

7. Kim Lutchko, NRB Districts 1 & 8 Coordinator, 440 Asa Bloomer State Office Building, 88 Merchants Row, 4th Floor, Rutland, VT 05701, phone number 802-261-1942.
8. Richard Kobik, NRB District 8 Environmental Commission Chair, 207 Maple Hill Road, Shaftsbury, VT 05262, phone number 802-375-2251.

This disclosure will be further updated if and when addresses are known to Respondent.

Respectfully submitted this 29th day of February 2024.



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W. Michael Nawrath.

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CERTIFICATE OF SERVICE AND DISCOVERY CERTIFICATE

Alexander M. Dean, Esq., Counsel for Respondent, hereby certifies that on the below date, a copy of:

- *Respondent's Supplemental Witness Disclosures*; and
- *Respondent's Requests for Production of Documents and Evidence.*

were served upon Samantha Lednický, Esq., Special Disciplinary Counsel, by way of email to Sam@catamountlaw.com, pursuant to PRB Rule 8B.

Dated: February 29, 2024



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