

STATE OF VERMONT
PROFESSIONAL RESPONSIBILITY BOARD

PRB-124-2022, PRB-076-2023

In re: W. MICHAEL NAWRATH

NOW COME the parties, Petitioner, the State of Vermont, by and through Special Disciplinary Counsel, Samantha Lednicky, Esq.; and Respondent, W. Michael Nawrath, by and through Counsel, Alexander M. Dean, Esq.; and hereby submit this proposed scheduling order to the Professional Responsibility Board, pursuant to Hearing Board No. 5's scheduling order dated November 27, 2023.

The parties propose the following deadlines:


1. *Exchange the names and addresses of all persons having knowledge of relevant facts and/or of witnesses:* December 12, 2023
2. *Serve requests for production of documents and evidence:* March 1, 2024
3. *Disclose expert witnesses:* March 15, 2024
4. *Disclose rebuttal expert witnesses:* April 29, 2024
5. *Take depositions:* May 31, 2024
6. *Complete discovery, including discovery-related motions:* May 31, 2024
7. *File motions to amend the petition of misconduct:* March 1, 2024
8. *File objections to the hearing panel conducting the merits hearing remotely by video conferencing:* May 31, 2024
9. *File pre-hearing motions, including motions in limine:* June 28, 2024

10. *File a witness list identifying the witnesses the party anticipates calling to testify at the merits hearing, together with a brief summary of each witness's anticipated testimony and an estimate of the amount of time needed for direct examination and an exhibit list identifying the exhibits the party anticipates presenting at the merits hearing, together with a representation as to whether or not the opposing party stipulates to each exhibit's authenticity or admissibility or both: June 28, 2024*
11. *To assist with scheduling, the parties shall also identify the date by which this matter will be ready for a merits hearing and provide an estimate of the amount of time needed for the hearing in the proposed scheduling order: June 28, 2024; The parties estimate two (2) full days of testimony at the hearing.*

Dated: December 8, 2023

/s/ Samantha Lednicky
Samantha Lednicky, Esq.
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Dated: December 8, 2023


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W. Michael Nawrath.

SO ORDERED:

Dated _____

Hearing Panel No. 5

Sarah Star, Esq., Chair

Devin McLaughlin, Esq.

Traci Cherrier, Public Member

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CERTIFICATE OF SERVICE

Alexander M. Dean, Esq., Counsel for Respondent, hereby certifies that on the below date, a copy of *Respondent's Witness Disclosures* and the *Proposed Scheduling Order (Stipulated)* were served upon Samantha Lednicky, Esq., Special Disciplinary Counsel, by way of email to Sam@catamountlaw.com, pursuant to PRB Rule 8B.

Dated: December 8, 2023



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