

STATE OF VERMONT  
PROFESSIONAL RESPONSIBILITY PROGRAM

In Re: Norman Watts  
PRB File Nos. 2019-102 and 2020-011

JOINT MOTION TO AMEND EXHIBIT LISTS

Respondent Norman Watts, Esq. and Special Assigned Disciplinary Counsel (“Special Disciplinary Counsel”) jointly move this Hearing Panel to permit the Parties to add certain exhibits identified below to their Exhibit Lists.

1. The deadline for filing exhibit lists in this matter was December 3, 2021. Both Parties filed exhibits lists at that time.
2. Special Disciplinary Counsel requested and received the Panel’s agreement to file a supplemental list on December 10, 2021, due to a supplemental production made at that time. *See* Letter to Hearing Panel, December 3, 2021; Revised Witness List, December 10, 2021.
3. While preparing for trial, it became clear to both Parties that certain documents should be added to their respective Exhibit Lists and included in the sets of digital Exhibit sent to the Hearing Panel. This would maximize logistical efficiency for this remotely conducted hearing.
4. The Parties jointly ask the Hearing Panel to allow for the amendment of their respective Exhibits Lists as follows:
  - a. The Parties may add any pleadings from this Professional Responsibility Board Matter to their Exhibit List.
  - b. The Parties may add the transcripts of the interviews of Respondent from June 30 and July 2, 2020, and the transcript of Ms. Reckard’s deposition.

c. The Parties agree that Respondent may add the summary judgment order from Mr. Alibozek's case as an exhibit.

5. Special Disciplinary Counsel and Respondent jointly make this request to better facilitate the upcoming hearing in this matter.

6. Respondent may also want to amend his Witness List to remove witnesses, and Special Disciplinary Counsel consents to the removal of any witness from his Witness List.

Dated: June 6, 2023

/s/ Navah C. Spero

Navah C. Spero, Esq.  
Alfonso Villegas, Esq.  
Gravel & Shea PC  
76 St. Paul Street, 7<sup>th</sup> Floor, P.O. Box 369  
Burlington, VT 05402-0369  
(802) 658-0220  
nspero@gravelshea.com  
avillegas@gravelshea.com  
Special Assigned Disciplinary Counsel

/s/ Norman E. Watts

Norman E. Watts, Esq.  
Watts Law Firm, PC  
176 Waterman Hill Rd., Ste. 4, P.O. Box 270  
Quechee, VT 05059  
(802) 457-1020  
nwatts@wattslawvt.com  
Respondent

STATE OF VERMONT  
PROFESSIONAL RESPONSIBILITY PROGRAM

In Re: Norman Watts  
PRB File Nos. 2019-102 and 2020-011

CERTIFICATE OF SERVICE

I, Navah C. Spero, certify that, on June 6, 2023, I caused to be served the Parties' Joint  
Motion to Amend Exhibit Lists as follows:

Via E-mail

Norman Watts, Esq.  
Watts Law Firm, PC  
P.O. Box 270  
Quechee, VT 05059  
nwatts@wattslawvt.com

Dated: June 6, 2023

/s/ Navah C. Spero

Navah C. Spero, Esq.  
Gravel & Shea PC  
76 St. Paul Street, 7<sup>th</sup> Floor, P.O. Box 369  
Burlington, VT 05402-0369  
(802) 658-0220  
nspero@gravelshea.com  
Specially Assigned Disciplinary Counsel