

STATE OF VERMONT
PROFESSIONAL RESPONSIBILITY PROGRAM

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

REPLY IN SUPPORT OF REQUEST TO RESOLVE DISCOVERY DISPUTE

Navah C. Spero, Esq., Specially Assigned Disciplinary Counsel (“Special Disciplinary Counsel”) files this reply in support of her Request to Resolve Discovery Dispute.

Mr. Watts’s primary argument in opposing the Request to Resolve Discovery Dispute is that Special Disciplinary Counsel has previously requested these same documents, he has previously performed a diligent search for them, and he has already provided all of the documents requested. This is not correct, largely because Special Disciplinary Counsel did not seek many of the requested documents during the investigative stage of this proceeding. Further, and as discussed in more detail below, an argument that Mr. Watts has already performed a diligent search for and produced at least some of these documents is simply not credible.

Attached here as Exhibit 1 are the letters Special Disciplinary Counsel sent to Mr. Watts seeking documents and his responses during the course of the investigation. Exhibit 1 does not include the attachments sent with those letters, for the Panel’s convenience, but provide the panel with information about what was previously requested.

These letters can be summarized as requesting the following as relates to both J.H. and G.A.:

- Complete billing records, including itemized monthly statements.
- All filings related to the summary judgment motion, including any exhibits.
- All cost estimates and any related documents.

- Any e-mails or memoranda estimating potential damages, discussing the likelihood of success, or evaluating the case.
- All memoranda, e-mails, notes, or other documents that reflect the legal and factual research, calculations, or other information that Mr. Watts used to support his statements regarding the quality of the client's case and possible recovery.
- All copies and versions of the client intake form for each client.

For J.H., Special Disciplinary Counsel also requested documents related to settlement discussions. For G.A., Special Disciplinary Counsel also requested G.A.'s engagement letter and related communications; communications about late fee payments; documents related to G.A.'s retainer; and telephone and e-mail records reflecting Mr. Watts' communications with G.A. about the outcome of summary judgment, the retainer or any fees Mr. Watts claimed were outstanding.

Special Disciplinary Counsel received responses to some but not all of these requests. For example, Mr. Watts never provided memoranda or notes reflecting his legal research or notes evaluating each client's case. He did provide complete billing files for each client. At no time did Special Disciplinary Counsel request the entire file for each client and at no time did she receive it.

Mr. Watts' responses to Special Disciplinary Counsel's Discovery Requests state that he has "already produced all responsive materials" twenty-five times where that is not possible. For example, in request 1, Mr. Watts has never produced any documents related to any prior disciplinary action against him, even though he has previously received a public reprimand. *See In re Norman Watts*, P.R.B. File No. 2019-006. Request 16 seeks "all written communications between G.A. or G.A.'s wife on the one hand and any Person at Your Firm on the other hand."

Mr. Watts previously produced approximately 15 e-mails or e-mail chains totaling 40 pages, even though he alleges elsewhere that his firm's "paralegal received 30 emails each week from [G.A.]." Answer to Petition, Count IV. Either Mr. Watts was not truthful about the "30 e-mails each week" in his Answer to the Petition or he is not responding truthfully to discovery in this instance. Mr. Watts did not even respond to Question 17, which requests all firm internal communications. Mr. Watts has never produced any internal communications. Request 28 is yet another example. Mr. Watts stated that he previously produced a memorandum related to J.H. dated September 13, 2016, referenced in his response to paragraph 51 of the Petition of Misconduct. Special Disciplinary Counsel does not have that document. In addition, as it relates to J.H., Mr. Watts has only provided approximately 1-2 dozen e-mails, yet states he has provided "voluminous amounts of e-mails" seven times in the course of his responses to the discovery requests. In short, Mr. Watts' responses cannot be accurate as each one states that he has previously provided "all responsive materials."

Mr. Watts has put the documents requested by Special Disciplinary Counsel, including the two clients' files, at issue by choosing to answer the Petition of Misconduct with certain allegations. For example, Mr. Watts states in multiple locations that he spoke by phone to G.A. Answer to Petition, Count I, Count IV, ¶¶ 24. Special Disciplinary Counsel is entitled to discovery on these alleged phone calls because they are part of Mr. Watts' defense. Another example is that Mr. Watts claims he told G.A. at G.A.'s deposition that he did not plan to respond to any filing to defend one of the claims – the claim alleging violation of the covenant of good faith and fair dealing – because there was no evidence to support it. *Id.* at Count I, ¶ 45. Special Disciplinary Counsel seeks documents related to this alleged discussion.

During the course of her investigation, Special Disciplinary Counsel sought documents necessary to investigate the complaints brought by J.H. and G.A. Now, Special Disciplinary Counsel seeks the documents Mr. Watts himself put at issue in choosing his defenses to these claims. Special Disciplinary Counsel asks the Panel to resolve this discovery dispute by requiring Mr. Watts to provide all requested documents within seven days so that this matter may proceed promptly and according to its schedule.

Dated: Burlington, Vermont
July 26, 2021

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

November 11, 2019

E-MAIL
PERSONAL AND CONFIDENTIAL

Norman E. Watts, Esq.
Watts Law Firm, PC
P.O. Box 270
Woodstock, VT 05091-0270

Re: PRB File No. 2019-102

Dear Mr. Watts:

I have been appointed to act as bar counsel in this matter. I have reviewed Ms. Hiramoto's complaint and your response. To continue my review of this matter, I need the following information from your files:

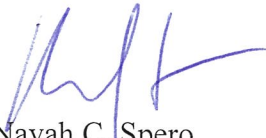
1. Your complete billing records, including itemized monthly statements.
2. All filings related to the summary judgment motion, including any exhibits.
3. All cost estimates or communications that included cost estimates from your office to Ms. Hiramoto.
4. Any e-mails or memoranda where you estimated potential damages, discussed the likelihood of success, evaluated the case, or discussed settlement of the case.

I would appreciate production of these documents within fourteen days, but please let me know if this is not possible and we can arrange a different production date.

Please be in touch with any questions.

Very truly yours,

GRAVEL & SHEA PC


Navah C. Spero

NCS:lbb

EXHIBIT

1

January 17, 2020

PERSONAL AND CONFIDENTIAL

Norman E. Watts, Esq.
P. O. Box 270
Woodstock, VT 05091

Re: PRB File No. 2020-011, Gary Alibozek, Complainant

Dear Mr. Watts:

As you may know, Gary Alibozek filed a disciplinary complaint against you in July 2019. *See* July 19, 2019 Correspondence. Disciplinary Counsel dismissed that complaint, but the Professional Responsibility Board reversed that decision on September 24, 2019. *See* September 24, 2019 Correspondence.

The Vermont Supreme Court has adopted rules governing the Professional Responsibility Program. Those rules appear in Administrative Order 9. Under those rules, Mr. Alibozek's disciplinary complaint has been referred back to Disciplinary Counsel. I have been appointed to serve as Special Disciplinary Counsel, and have been instructed to reach out to you for a response to the original complaint.

Mr. Alibozek's complaint includes several concerns about his case. The essence of his claim appears to be that you misled Mr. Alibozek regarding his chances for a successful recovery. Further, Mr. Alibozek claims that his concerns about your mounting fees were met with threats to "drop" the case. This complaint can be construed as alleging that you charged an unreasonable fee and that you failed to competently represent him by submitting relevant evidence to the Court.

To evaluate these allegations, I request that you provide me with a written response to the complaint within no later than February 18, 2020. You may provide the response by mail or e-mail.

Please include the following documents in your response:

1. a copy of your engagement agreement with Mr. Alibozek;
2. communications with Mr. Alibozek regarding the engagement letter;

Norman Watts, Esq.

January 17, 2020

Page 2

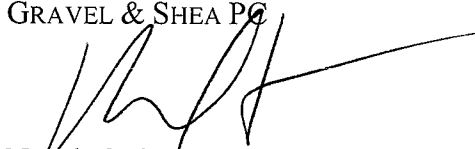
3. any documents related to the summary judgment proceedings and your choice not to submit certain documents in connection with those proceedings;
4. e-mails or documents regarding your evaluation(s) of the strengths and weaknesses of the case and Mr. Alibozek's chances of success;
5. a copy of any estimates or quotes related to the overall cost of the case, including without limitation any e-mails relaying estimates or quotes;
6. any communications about late payments or fee disputes during your representation of Mr. Alibozek;
7. your monthly bills, as sent to Mr. Alibozak; and
8. any other documents that you believe will assist in our investigation.

Please let me know if you have any questions in the meantime.

Upon concluding my investigation, I will either dismiss the complaint, refer it for non-disciplinary resolution, or commence formal proceedings against your law license. I will notify you of my decision.

Very truly yours,

GRAVEL & SHEA PC


Navah C. Spero

NCS:lbb

Enclosures

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Navah C. Spero
Shareholder
nspero@gravelshea.com

June 17, 2020

E-MAIL

Norman Watts, Esq.
Watts Law Firm, PC
19 Central Street, # 1005
Woodstock, VT 05091

Re: PRB File No. 2020-011

Dear Norman:

Thank you for providing responsive documents to us earlier this year. We reviewed the documents you produced and have two follow-up requests.

First, following up on request 4 from our January 7, 2020 letter, we understand that you provided your client with verbal statements related to the quality of his case and evaluations of the possible recovery. We have not found among the documents you produced any notes, e-mails, or other evaluations of his case. Please produce all memoranda, e-mails, notes, or other documents that reflect the legal and factual research, calculations, or other information that you used to support your statements regarding the quality of your client's case and the possible recovery.

Second, thank you for providing the opposition to summary judgment that you drafted. Following up on request 3 from our letter, we did not see the notes, drafts, legal research, or any other documents related to that filing or your decision not to submit certain affidavits. Please provide those documents.

Please let me know if you have any questions. In anticipation of conducting an interview on June 30, 2020, please provide these documents to me by June 26, 2020.

Very truly yours,

GRAVEL & SHEA PC



Navah C. Spero

NCS:amb

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June 17, 2020

E-MAIL

Norman Watts, Esq.
Watts Law Firm, PC
19 Central Street, # 1005
Woodstock, VT 05091

Re: PRB File No. 2019-102

Dear Norman,

Thank you for providing responsive documents to us earlier this year. We reviewed the documents you produced and have a few follow-up requests

First, following up on request four from my November 11, 2019 letter, we understand that you provided your client with verbal statements related to the quality of her case and evaluations of the possible recovery. We have not found among the documents you produced any notes, e-mails, or other evaluations of her case. Please produce all memoranda, e-mails, notes, or other documents that reflect the legal and factual research, calculations, or other information that you used to support your statements regarding the quality of your client's case and the possible recovery.

Second, following up on request three, please provide all documents related to your efforts to estimate, predict, or budget the cost of the litigation, including all communications related to those efforts. This includes documents related to estimating your legal fees and collecting from your client the amount due on your invoices.

Please let me know if you have any questions. In anticipation of conducting an interview on June 30, 2020, please provide these documents to me by June 26, 2020.

Very truly yours,

GRAVEL & SHEA PC



Navah C. Spero

NCS:amb

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July 14, 2020

Navah C. Spero
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nspero@gravelshea.com

E-MAIL

Norman Watts, Esq.
Watts Law Firm, PC
19 Central Street, # 1005
Woodstock, VT 05091

Re: PRB File No. 2020-011

Dear Norman:

Following up on our interview in the above referenced matter, please provide the following additional materials:

- A bank record reflecting the receipt of and current status of the retainer paid by Mr. Alibozek, including the type of account it is currently held in.
- Phone, e-mail or other similar record reflecting your office's last communication with the Alibozeks about their retainer or any fees you claim are outstanding.
- The full bill for October 2018.
- All copies and versions of the client intake form and any notes or e-mails related to the intake form for Mr. Alibozek.

During the interview, there were two questions that required further review of the file. Specifically, please provide responses to the following two questions:

- Please explain why you chose not to file a response to the Motion for Judgment on the Pleadings to dismiss Count II, Breach of the Implied Covenant of Good Faith and Fair Dealing.
- Please explain why you chose not to file the Bixby and Fredette affidavits. In your response, please explain who each of them were in the context of the case.

Please provide your response no later than July 21, 2020.

Very truly yours,

GRAVEL & SHEA PC



Navah C. Spero



ATTORNEYS AT LAW

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July 14, 2020

E-MAIL

Norman Watts, Esq.
Watts Law Firm, PC
19 Central Street, # 1005
Woodstock, VT 05091

Re: PRB File No. 2019-102

Dear Norman:

Following up on our interview in the above referenced matter, please provide the following additional materials:

- The complete bill with detailed time entries for February 5, 2015.
- All copies and versions of the client intake form and any notes or e-mails related to the intake form for Ms. Hiramoto.

Please provide your response no later than July 21, 2020.

Very truly yours,

GRAVEL & SHEA PC

A handwritten signature in blue ink, appearing to read "Navah C. Spero", written over the printed name.

Navah C. Spero

NCS:lbb

WATTS LAW FIRM
A Professional Corporation

Norman E. Watts, Esq.

Admitted:
Vermont
District of Columbia

Margaux Reckard, Paralegal

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Email: info@wattslawvt.com

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Telephone: 802-457-1020
Fax: 802-432-1074

July 24, 2020

VIA EMAIL ONLY

Navah C. Spero, Esq.
Gravel & Shea, PC
76 St. Paul Street
PO Box 369
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nspero@gravelshea.com

Re: PRB File No. 2019-102 (Hiramoto)

Dear Navah:

I am responding below to your July 14, 2020 letter requesting several additional items related to the above-referenced matter:

1. The complete bill with detailed time entries for February 5, 2015.

The bill is enclosed herewith.

2. All copies and versions of the client intake form and any notes or e-mails related to the intake form for Ms. Hiramoto.

We have no digital records of the client intake form for Ms. Hiramoto or any related notes. The only paper documents in our files contain documents that have already been provided to you. In other words, there are no additional intake documents.

Sincerely,



Norman E. Watts, Esq.

NEW:mr

Enclosure: 2/5/15 billing statement

WATTS LAW FIRM
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Norman E. Watts, Esq.

Admitted to practice:
Vermont
Washington, D. C.

Stefan Ricci, Esq., Of Counsel
Jennifer Meagher, Law Clerk

19 Central Street
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(802)457-1020 Telephone
(802) 432-1074 Fax

Email: wattslawfirmc@gmail.com

Website: www.WattsLawVT.com

February 5, 2015

(Transmitted via email to: jmhiraamoto@gmail.com)

Ms. Judy Hiramoto
316 Naylor Street
San Francisco, CA 94112

STATEMENT FOR LEGAL SERVICES

**For services and expenses incurred in connection with employment lawsuit
January 2015**

Services:

34.3 Hours Attorney Time (\$250/hour)..... \$ 8,575.00
1.5 Hours Law Clerk Time (\$60/hr)..... 90.00

Total.....\$ 8,665.00

Expenses:

Extra Postage..... \$ 3.22

Total.....\$ 3.22

Total Current Charges.....\$ 8,668.22

Previous Balance..... \$ 1,850.00

Payments..... \$ 1,850.00

Net Previous Balance..... \$ 00.00

Net Previous Balance.....\$ 00.00

Total Balance/Balance Due.....\$ 8,668.22

Net: 10 Days

[Major Credit Cards Accepted]

Thank You!

WOODSTOCK VERMONT 05091**CLIENT SERVICES RECORD****CLIENT: JUDY HIRAMOTO**

January 2015

Date	Client	Action	Time
1/5/15	Hiramoto	Email from JH re requests to admits	.1
1/9/15	Hiramoto	Ofc conf re Dept case status; discovery plan – admits, scheduling etc; email to def counsel re discovery; work on admits revisions	3.2
1/10/15	Hiramoto	Work on admits revisions; JH email re defense counsel	3.5
1/11/15	Hiramoto	Review JH admits draft; Work on admits revisions	3.8
1/12/15	Hiramoto	Finalize admits revisions; email msg to JH	1.3
1/13/15	Hiramoto	Emails w/JH re rule 83.1; Review deft's initial disclosures; prepare request for docts.	3.4
1/14/15	Hiramoto	Emails w/JH re VT avail dates, witnesses; teleconf w/def counsel; emails w/Evaluator & review Jackson draft dep outline	.6
1/19/15	Hiramoto	JH email re SFCC	.1
1/20/15	Hiramoto	Review Wallis dep outline from JH	.5
1/21/15	Hiramoto	Review deft's responses to production requests; emails w/def counsel & JH; final review of admits	.6
1/21/15	Hiramoto	Review deft's discovery productions	1.5
1/22/15	Hiramoto	Continue review of deft's discov productions & prep response to objections	1.7
1/23/15	Hiramoto	Doct review & work on index of documents	3.3
1/24/15	Hiramoto	Doct review & work on index of documents	1.4
1/25/15	Hiramoto	Doct review & work on index of documents	3.5
1/26/15	Hiramoto	JH emails re missing docts, witnesses	.2
1/27/15	Hiramoto	Review disclosures & JH witness list for NW contacts & depositions, scheduling infor from JH; communicate w/def counsel & JH re same; further research re USDC's latest decisions re comparators	1.6
1/28/15	Hiramoto	Review deft's discovery requests; email w/JH re same & depo schedule; add'l emails w/def counsel re same & privilege log; Review JH's supplemental requests for docts; emails w/her re same; emails w/Dr. Harvey	1.6
1/29/15	Hiramoto	Prep JH supplemental req for transmittal; email response from def counsel re depo scheduling; JH emails re same	1.1
1/30/15	Hiramoto	JH emails re deft's discovery posture; review/transmit deft's discovery requests to JH; emails re same	.6
1/31/15	Hiramoto	JH revised sup discov requests; revise for transmittal; def counsel notice of depo; email def counsel re same	1.4

January 2015	Hiramoto	Services for One Month	34.3
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**Watts Law Firm PC
January 2015 Hours**

Client: Judy Hiramoto

Jennifer Meagher, Law Clerk

Date	Client	Services	Time
1/14/15	Hiramoto	emailed copy of Local Rule 83.1 (b) to client at NW request	.1 (N/C)
1/20/15	Hiramoto	begin proof/prep of requests to admit; compared 2x docs request for production from NW to first requests before completing proof/prep; to NW for review w/notes	.8
1/22/15	Hiramoto	final revisions of request for admission; prepared for transmittal, cover ltr to defense counsel; drafted disc cert and cert of service and efiled w/court	.7
1/26/15	Hiramoto	responded to client email re: doc production	.1 (N/C)
Jan 2015	Hiramoto	Monthly Total	1.5

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Norman E. Watts, Esq.

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Margaux Reckard, Paralegal

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July 24, 2020

VIA EMAIL ONLY

Navah C. Spero, Esq.
Gravel & Shea, PC
76 St. Paul Street
PO Box 369
Burlington, VT 05402-0369
nspero@gravelshea.com

Re: PRB File No. 2019-102 (Hiramoto)

Dear Navah:

As a follow-up to my prior letter, one additional thought I forgot to relay to you – the appellate attorney evaluated the case and concluded that it was worthy of appeal, with the possibility of overturning the trial court SJM decision.

The appeal filing is attached here.

Sincerely,



Norman E. Watts, Esq.

NEW:mr

Enclosure: 9/2/16 Appellant's Brief

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Norman E. Watts, Esq.

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July 24, 2020

VIA EMAIL ONLY

Navah C. Spero, Esq.
Gravel & Shea, PC
76 St. Paul Street
PO Box 369
Burlington, VT 05402-0369
nspero@gravelshea.com

Re: PRB File No. 2020-011 (Alibozek)

Dear Navah:

I am responding below to your July 14, 2020 letter requesting several additional items related to the above-referenced matter.

Documents

- 1) A bank record reflecting the receipt of and current status of the retainer paid by Mr. Alibozek, including the type of account it is currently held in.

When the litigation ended with the SJM decision, I spoke with Gary Alibozek by phone about the status of his account, indicating that he owed Watts Law Firm a balance of \$954. I asked him if he wished to deduct the amount from his retainer and send him the balance. He wanted to discuss with his wife. I never heard back from him, though I did speak to Sharyn Alibozek about the outstanding balance/retainer refund. She also did not provide an answer to my question about how they preferred to net out the balance. I tried to reach her again, but she did not return my call, and we were at a standoff.

At some point, I transferred the amount to the operating account to deduct the expenses so at least that portion was settled.

Since you reminded me about the outstanding balance, we have remitted Mr. Alibozek a refund for the retainer, minus the \$954.98 balance (or \$1,545.02). The issue was also encompassed in the 2019 PRB audit that resulted in sanctions.

A copy of the Alibozecks' retainer checks are enclosed with this letter, deposited August 17 and August 18, 2017. Unfortunately, we do not have a bank record reflecting the deposits because our bank's online record only goes back eighteen months; I have ordered the deposit record.

- 2) Phone, e-mail or other similar record reflecting your office's last communication with the Alibozecks about their retainer or any fees you claim are outstanding.

We have record of a reminder to the Alibozecks in March 2018 that the retainer could not be used to offset costs. Please refer to the enclosed March 27, 2018 email.

Our final communication with them regarding outstanding fees is also enclosed (please refer to the February 12, 2019 email).

- 3) The full bill for October 2018

We have provided this to you previously, but the bill and the accompanying notice to the client is also enclosed here.

- 4) All copies and versions of the client intake form and any notes or e-mails related to the intake form for Mr. Alibozek.

Mr. Alibozek contacted us twice – once in 2015, when our firm was too busy to take on additional cases, and again in 2017 after Mr. Alibozek had been handling his matter *pro se*. All related documents, per your request, are enclosed herewith.

Other Requests

- 5) Please explain why you chose not to file a response to the Motion for Judgment on the Pleadings to dismiss Count II, Breach of the Implied Covenant of Good Faith and Fair Dealing.

To sustain a GFFD claim, a plaintiff is required to produce evidence of the defendant's bad faith conduct, here, in the promotion decision by interviewers who were fellow machinists. The client alleged that defendant always preserved the ballots interviewers completed. That was key evidence to defendant's bad faith conduct. No such documentary evidence was produced in discovery, contradicting the client's claim that the evidence was contained in the actual ballots that were always retained in defendant's records. But the ballots were not produced and defendant's witness described that 1) It did not always retain the ballots, there was no uniform practice, and, anyway, 2) it had misplaced or discarded the ballots in this instance long before the lawsuit was filed. Absent the ballots, we had only plaintiff's allegations against the defendant's multiple testimonies that there was no set practice concerning ballot retention.

Further, the claim requires different conduct than the evidence supporting the implied contract claim, making the ballots especially necessary because there was no other evidence of bad faith conduct – again, contrary to the plaintiff's claim that there was a management conspiracy to prevent his promotion.

Hence, the claim was unsupportable. To defend it, I concluded, would only impinge the client's credibility with the court. It was my judgment call not to oppose the dismissal of the GFFD claim.

6) Please explain why you chose not to file the Bixby and Fredette affidavits. In your response, please explain who each of them were in the context of the case.

Concerning my decision not to include the Bixby and Fredette affidavits with our defense to the SJM, the key issue in the claims before the court, implied employment contract and age discrimination, were unrelated to the plaintiff's competence. The individuals who submitted the affidavits were only able to support the plaintiff's competence as a machinist. Plaintiff's competence was not an issue in the SJM process.

The defendant's witnesses testified, for the most part, that he was competent and it left the decision up to the interviewers, not management's, evaluations of his competence. Hence, the affidavits were not relevant or material to the claims to be evaluated by the court. It was my judgment that the affidavits were useless and, perhaps, distracting to the central issues.

You have my email address should you wish to discuss any of these items further. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Norman E. Watts", with a stylized flourish at the end.

Norman E. Watts, Esq.

NEW:mr

Enclosures:

1. Alibozek – Retainer Fee Payments
- 2a. Email re: retainer, 3/27/18
- 2b. Email re: outstanding expenses, 2/12/19
3. Alibozek October 2018 billing statement & email, 11/9/18
4. Alibozek – 2015 & 2017 intakes

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Navah C. Spero
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nspero@gravelshea.com

August 6, 2020

E-MAIL

Norman Watts, Esq.
Watts Law Firm, PC
19 Central Street, # 1005
Woodstock, VT 05091

Re: PRB File No. 2020-011

Dear Norman:

A few follow up questions to your letter of July 24, 2020.

First, you stated in your letter that you have remitted \$1,545.02 to Gary Alibozek sometime prior to your July 24 letter. Can you send me the record of that payment to Gary Alibozek? If any communication was provided with that payment, please provide that, as well.

Second, please send me a phone record and file notation reflecting the two phone conversations you refer to on page 1 of your letter, the first one occurring immediately after the Court ruled against Gary Alibozek on the summary judgment motion and the second conversation with Sharyn Alibozek sometime thereafter.

Third, please provide documentation of the transfer of Mr. Alibozek's retainer funds from your trust account to your operating account that you reference in your July 24 letter. That documentation should include a bank statement, a bank form showing the transfer and entries on your account ledgers.

Fourth, in your letter you state "The issue was also encompassed in the 2019 PRB audit that resulted in sanctions." Which issue specifically are you referring to?

Fifth, please provide me your current standard engagement letter.

Sixth, please disclose all dates upon which you reconciled your trust account(s) since February 2019 and show me the record of that reconciliation that includes all elements listed in V.R.P.C. 1.15A(a).

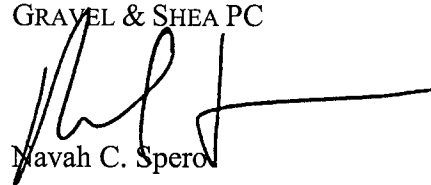
Norman Watts, Esq.

August 6, 2020
Page 2

Please provide these documents no later than August 14, 2020.

Very truly yours,

GRAVEL & SHEA PC

A handwritten signature in black ink, appearing to read 'Navah C. Spero', with a long horizontal flourish extending to the right.

Navah C. Spero

NCS:lbb

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, Esq., certify that, on July 26, 2021, I caused to be served my Reply in
Support of Request to Resolve Discovery Dispute as follows:

Via E-mail

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

Dated: Burlington, Vermont
July 26, 2021

/s/ Navah C. Spero

Navah C. Spero, Esq.
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Specially Appointed Counsel