STATE OF VERMONT PROFESSIONAL RESPONSIBILITY PROGRAM

In Re: Norman Watts

PRB File Nos. 2019-102 and 2020-011

RESPONDENT'S STIPULATED MOTION FOR EXTENSION OF TIME TO DEPOSE SPECIAL DISCIPLINARY COUNSEL'S EXPERT WITNESS

Respondent Norman E. Watts, Esq. hereby moves the Hearing Panel for an

extension of time to depose Special Disciplinary Counsel's expert witness, from February

25, 2023 to March 30, 2023.

On January 26, 2023, the Panel ordered the deposition of Special Counsel's expert

witness be completed within 30 days after the entry of its Order – February 25, 2023.

Respondent and Special Disciplinary Counsel Navah C. Spero have conferred but

have mutually determined their respective travel, deposition, and hearing schedules,

including Attorney Spero's prior travel commitments for one week of the 30-day window,

will prevent Respondent from taking the expert deposition within the 30 days.

Attorney Spero has graciously consented to the filing of this motion.

WHEREFORE, Respondent respectfully requests the Panel approve the extension

of time as indicated.

Respectfully submitted on this 8th day of February, 2023.

Norman E. Watts, Esq., Respondent

Watts Law Firm, PC

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info@wattslawvt.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this date he made service of *Respondent's Stipulated Motion for an Extension of Time* via email upon the following parties:

Navah C. Spero, Esq. Gravel & Shea PC nspero@gravelshea.com Merrick Grutchfield Court Administrator's Office Professional Responsibility Program merrick.grutchfield@vermont.gov

DATED: February 8, 2023.

Norman E. Watts, Esq. Watts Law Firm, PC info@wattslawvt.com