

STATE OF VERMONT
PROFESSIONAL RESPONSIBILITY PROGRAM

In Re: Thomas Melone
PRB File No. 25-120

DISCOVERY CERTIFICATE

I certify that on October 1, 2025, I sent the following documents by email to Thomas Melone at thomas.melone@AllcoUS.com and thomas.melone@gmail.com.

Bates No.	Description	Document No.
000287	Order Granting Town of Bennington's Emergency Motion to Stay Discovery - May 21, 2025 PLH Vineyard Sky LLC v. Town of Bennington - Civil Division, Chittenden Unit (Not a Duplicate of 277)	4925-6737-4409
000288-000296	Town of Bennington's Emergency Motion for Expedited Review/Shortened Response Deadline - May 26, 2025 PLH Vineyard Sky LLC v. Town of Bennington - Civil Division, Chittenden Unit	4921-4846-8809
000297-000301	Affirmation of Daniel Monks - May 26, 2025 PLH Vineyard Sky LLC v. Town of Bennington - Civil Division, Chittenden Unit	4937-1196-1161
000302-000306	Affidavit of Zak Hale - May 26, 2025 PLH Vineyard Sky LLC v. Town of Bennington - Civil Division, Chittenden Unit	4915-6768-8777

000307-000332	Town of Bennington's Motion to Dismiss Complaint - May 26, 2025 PLH Vineyard Sky LLC v. Town of Bennington - Civil Division, Chittenden Unit	4932-6920-0201
000333	Order stating Response to Motion to Dismiss is due June 9, 2025; Any reply will then be due June 16, 2025 - May 27, 2025 PLH Vineyard Sky LLC v. Town of Bennington - Civil Division, Chittenden Unit	4920-6412-4233
000334-000335	Town of Bennington's Motion to Stay Discovery - May 27, 2025 PLH Vineyard Sky LLC v. Town of Bennington - Civil Division, Chittenden Unit	4898-2495-6233
000336-000345	PLH Vineyard Sky's Motion to Vacate the Court's Stay Order - May 27, 2025 PLH Vineyard Sky LLC v. Town of Bennington - Civil Division, Chittenden Unit	4929-0036-4361
000346	PLH Vineyard Sky's Motion to Stay Response to Motion to Dismiss - May 28, 2025 PLH Vineyard Sky LLC v. Town of Bennington - Civil Division, Chittenden Unit	4936-9177-7097
000347-000348	Town of Bennington's Opposition to PLH Vineyard Sky's Motion to Stay Response to Motion to Dismiss - May 28, 2025 PLH Vineyard Sky LLC v. Town of Bennington - Civil Division, Chittenden Unit	4920-3620-6665

000349	Town of Bennington's Notice of Supplemental Authority - May 28, 2025 PLH Vineyard Sky LLC v. Town of Bennington - Civil Division, Chittenden Unit	4930-4290-5417
000350	Order granting Motion to Stay Discovery; neither party shall initiate any discovery proceedings prior to Court's decision on Town of Bennington's Motion to Dismiss; Town of Bennington's response to the Motion to Vacate is due June 4, 2025; denying the Motion to Stay Response - May 28, 2025 PLH Vineyard Sky LLC v. Town of Bennington - Civil Division, Chittenden Unit	4909-3087-6745
000351-000356	PLH Vineyard Sky's Motion for Recusal of the Hon. Samuel Hoar - May 28, 2025 PLH Vineyard Sky LLC v. Town of Bennington - Civil Division, Chittenden Unit	4934-4437-9209
000357-000359	Town of Bennington's Opposition to Motion to Recuse Judge Hoar - May 28, 2025 PLH Vineyard Sky LLC v. Town of Bennington - Civil Division, Chittenden Unit	4912-7343-3929
000360	Entry Order regarding PLH Vineyard Sky's Motion to Recuse Judge Hoar - Referred to the Chief Superior Judge - May 28, 2025 PLH Vineyard Sky LLC v. Town of Bennington - Civil Division, Chittenden Unit	4913-7632-5449

000361-000364	Order Denying PLH Vineyard Sky's Motion to Rucuse Judge Hoar - May 30, 2025 PLH Vineyard Sky LLC v. Town of Bennington - Civil Division, Chittenden Unit	4905-8006-3049
000365-000404	PLH Vineyard Sky's Notice of Appeal - February 25, 2025 PLH Vineyard Sky, LLC v. Town of Bennington - Environmental Division	4902-3180-5001
000405-000410	Town of Bennington's Motion for Expedited Review/Shortened Response Deadline - February 27, 2025 PLH Vineyard Sky LLC v. Town of Bennington - Environmental Court	4904-2408-7625
000411-000415	Affirmation of Town Manager (Stuart Hurd) - February 27, 2025 PLH Vineyard Sky LLC v. Town of Bennington - Environmental Division	4904-0993-1849
000416-000424	Town of Bennington's Motion to Dismiss a Notice of Appeal filed by PLH Vineyard Sky LLV - February 27, 2025 PLH Vineyard Sky LLC v. Town of Bennington - Environmental Division	4927-3187-2585
000425	Order Granting Town of Bennington's Motion for Expedited Review - February 28, 2025 PLH Vineyard Sky LLC v. Town of Bennington - Environmental Division	4922-3255-3801

000426-000437	PLH Vineyard Sky's Opposition to Town of Bennington's Motion for Expedited Treatment and Motion to Dismiss - March 3, 2025 PLH Vineyard Sky LLC v. Town of Bennington - Environmental Division	4933-9273-7609
000438-000447	PLH Vineyard Sky's First Amended Notice of Appeal - March 3, 2025 PLH Vineyard Sky LLC v. Town of Bennington - Environmental Division	4917-0013-9337
000448-000450	Order Granting Town of Bennington's Motion to Dismiss - March 6, 2025 PLH Vineyard Sky LLC v. Town of Bennington - Environmental Division	4911-7637-5881
000451-000459	PLH Vineyard Sky's Motion for Reconsideration - April 3, 2025 PLH Vineyard Sky LLC v. Town of Bennington - Environmental Division	4900-5387-5273
000460-000475	PLH Vineyard Sky's Second Amended Notice of Appeal - April 3, 2025 PLH Vineyard Sky LLC v. Town of Bennington - Environmental Division	4919-5074-9257
000476-000480	Town of Bennington's Opposition to PLH Vineyard Sky's Motion for Reconsideration - April 17, 2025 PLH Vineyard Sky LLC v. Town of Bennington - Environmental Division	4930-7691-9881

000481-000484	Order Denying PLH Vineyard Sky's Motion to Reconsider - April 28, 2025 PLH Vineyard Sky LLC v. Town of Bennington - Environmental Division	4900-9241-0441
000485	PLH Vineyard Sky's Notice of Appeal - May 27, 2025 PLH Vineyard Sky LLC v. Town of Bennington - Environmental Division	4912-7133-7801
000486-000493	Town of Bennington's Emergency Motion to Suspend Rules Pursuant to V.R.A.P. 2 For Expedited Review of Appeal - May 28, 2025 PLH Vineyard Sky LLC v. Town of Bennington - Supreme Court VT	4916-0812-7305
000494-000498	Affirmation of Daniel Monks - May 28, 2025 PLH Vineyard Sky LLC v. Town of Bennington - Supreme Court VT	4933-2910-2665
000499-000503	Affidavit of Zak Hale - May 28, 2025 PLH Vineyard Sky LLC v. Town of Bennington - Supreme Court VT	4907-4691-8729
000504	Entry Order: PLH Vineyard Sky to respond to Town of Bennington's Motion to Expedite by June 2, 2025 - May 29, 2025 PLH Vineyard Sky LLC v. Town of Bennington - Supreme Court VT	4916-3768-4041

000505-000506	Jenny Prosser June 3, 2025 email to Merrill Bent stating the Secretary of State does not have any records matching her request	4913-0480-0075
000507-000518	General Settlement Agreement among Chelsea Solar LLC, Apple Hill Solar LLC, PLH Vineyard Sky LLC, Allco Finance Limited, and the Town of Bennington - Executed May 30, 2025	4933-9946-1707
000519-000520	Thomas Melone's June 4, 2025 letter to Chasity Stoots-Fonberg (Clerk of Court, Chittenden Civil Division) clarifying statement made in the Motion to Vacate filed on May 27, 2025	4933-1348-4108
000521-000523	PLH Vineyard Sky's and Town of Bennington's Voluntary Dismissal Agreement - June 4, 2025 PLH Vineyard Sky LLC v. Town of Bennington - Supreme Court VT	4934-4947-1308
000524-000525	Chelsea Solar LLC, Vermont Public Utility Commission, and Town of Bennington's Voluntary Dismissal Agreement - June 5, 2025 Chelsea Solar LLC v. Vermont Public Utility Commission and Town of Bennington - Supreme Court of the State of Vermont	4938-8738-2860
000526	Stipulated Agreement to Dismiss - June 4, 2025 PLH Vineyard Sky LLC v. Town of Bennington - Civil Division	4906-3411-0540

000527	Stipulation of Dismissal - June 5, 2025 PLH Vineyard Sky LLC, Chelsea Solar LLC, Apple Hill Solar Llc, and Allco Finance Limited v. Town of Bennington - United States District Court - District of Vermont	4932-0200-7628
000528	Stipulation of Dismissal - June 5, 2025 PLH Vineyard Sky LLC and Apple Hill Solar v. Town of Bennington - United States District Court - District of Vermont	4896-9642-1452
000529	Stipulation of Dismissal - June 5, 2025 PLH Vineyard Sky LLC et al. V. Town of Bennington - United States Court of Appeals for the Second Circuit	4906-7094-1772
000530	Stipulated Agreement to Dismiss - June 5, 2025 Apple Hill Solar LLC v. Town of Bennington - Civil Division	4917-2902-0492
000531-000532	Thomas Melone's June 11, 2025 email to Merrill Bent apologizing for saying she was rude to an employee	4932-3023-9824
000533	Merrill Bent's notes regarding threats made by Michael Melone on January 28, 2025	4938-8592-7504
000534-000565	Apple Hill Solar's Brief - May 27, 2025 Standard Offer Contract - Supreme Court VT	4923-4412-7568
000566-000579	Order Denying Apple Hill Solar's Sixth Request for an Extension of the Standard Offer Contract Commissioning Milestone PUC Filing - November 20, 2024	4913-3815-0224

Bates No.	Description	NetDocs ID
000667	2025-04-25 Screening Letter from Andrew Strauss to Thomas Melone	4932-1286-3318
000686	2025-05-20 Letter from Merrick Grutchfield to Michael Hanley continuing appointment as Conflict Disciplinary Counsel	4900-4339-0281
000687	2025-05-20 Letter from Merrick Grutchfield to Thomas Melone informing Mr. Melone of Michael Hanley's Assignment to the Case	4929-9615-3175
000688	Master Org Chart - March 2025	4922-7283-2587
000789-000869	Apple Hill Solar's Motion for Recusal - May 29, 2025 - PUC	4903-2510-8300
000870-001041	Supreme Court of the United States, Petition for Writ of Certiorari - November 27, 2024	4929-8816-3916
001042-001051	Taylor v. Town of Cabot - 2017 VT 92	4902-7026-8492
001052-001055	McCoy v. Iberdrola Renewables, Inc.	4914-4283-6055
001056-001063	2025-06-17 Order Regarding Ex Parte Communication for Petitions of Chelsea Solar and Apple Hill Solar	4897-0993-3143
001064-001077	2024-11-20 Order Denying Apple Hill Solar's Request for an Extension of the Standard Offer Contract Commissioning Milestone	4906-9605-3591

001079-001084	2018-02-26 Docket for PLH LLC v. Town of Bennington 2:18-cv-00041	4925-0138-8376
001085-001103	2019-05 In Re Petition of Apple Hill Solar 2019 VT 64	4897-7764-6936
001104-001121	2020-01 In Re Petition of Chelsea Solar 2021 VT 27	4907-2739-4648
001122-001128	2020-03-09 Allco Renewable Energy Limited v. Volz 5:20-cv-00034	4898-6854-5624
001129-001134	2020-03-19 Docket for Allco Renewable Energy Limited v. Kulkin 220-cv-00044	4931-9757-8072
001135-001147	2020-07-21 Docket for Allco Finance Limited v. Roisman 2:20-cv-00103	4921-2350-8824
001148-001150	2023-11-21 Docket for Apple Hill Solar LLC v. Cheney 2:23-cv-00644	4937-0790-7672
001151-001155	2023-11-21 Docket for PLH Vineyard Sky LLC v. Town of Bennington 2:23-cv-00645	4908-8841-8136
001156-001159	2023-12-08 Docket for Allco Finance Limited v. Roisman 2:23-cv-00691	4933-5093-3592
001160-001161	2025-05-02 Docket for PLH Vineyard Sky LLC v. Town of Bennington 2:25-cv-00469	4919-1916-8600
001162-001163	2025-01-09 Letter from Merrill Bent to Holly Anderson re: Petition of Apple Hill Solar	4933-5201-4681

Dated: October 1, 2025

/s/ Michael F. Hanley

Michael F. Hanley
Conflict Disciplinary Counsel
Plante & Hanley, P.C.
P. O. Box 708
White River Junction, VT 05001-0708
802-295-3151, Ext. 102
mfhanley@plantehanley.com