

STATE OF VERMONT
PROFESSIONAL RESPONSIBILITY PROGRAM

In Re Thomas Melone

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PRB No. 25-120

**RESPONDENT’S MOTION FOR ADDITIONAL TIME TO FILE OPPOSITION TO
MOTIONS TO QUASH SUBPOENAS**

On December 16, 2025, Michael Hanley filed a motion to quash the subpoenas (the “Subpoenas”) issued to James Sullivan, Jeanette Jenkins, Shannon Barsotti and Dan Monks (collectively, the “Bennington Recipients”). Apparently, around that time, the law firm of Woolmington, Campbell, Bent & Stasny, P.C. also filed a motion to quash the Subpoenas purportedly on behalf of the Town of Bennington as well as on behalf of the Bennington Recipients, although the fact that each of the Bennington Recipients signed the motion muddies the waters with respect to whether they are filing the motion *pro se*. The Woolmington, Campbell, Bent & Stasny, P.C. motion was not served on Respondent and was not emailed to Respondent when it was posted to the PRB docket for this case. There is no certificate of service attached to that motion either. Respondent only discovered it accidentally. The Woolmington, Campbell, Bent & Stasny, P.C. motion also is missing the “Exhibit A” referred to on page 7 of that motion.

In light of the holiday season, the lack of a complete motion filed by Woolmington, Campbell, Bent & Stasny, P.C., and the significant volume of documents and evidence that will be of necessity disclosed in Respondent’s opposition to both motions to quash, Respondent hereby respectfully requests until January 13, 2026, to file his opposition to both motions to quash.

Dated: December 28, 2025

Respectfully Submitted,

/s/ Thomas Melone
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