

STATE OF VERMONT  
PROFESSIONAL RESPONSIBILITY PROGRAM

In Re: Thomas Melone  
Case No. PRB 120-2025

**DISCOVERY CERTIFICATE**

I certify that on January 27, 2026, I served the following documents by email on Thomas Melone at thomas.melone@allcous.com and thomas.melone@gmail.com.

- 1) Copies of my emails with Merrick Grutchfield on August 17-18, 2025;
- 2) Ms. Grutchfield's email to me on August 20, 2025;
- 3) My email to Ms. Grutchfield on August 18, 2025 enclosing:
  - a) *Motion for Finding of Probable Cause* (with Exhibit 1);
  - b) *Memorandum in Support of Motion for Finding of Probable Cause*;
  - c) *Affidavit of Michael F. Hanley, Conflict Disciplinary Counsel*; and
  - d) [Proposed] *Notice of Probable Cause Decision*.
- 4) The *Notice of Probable Cause Decision* issued by the Probable Cause Hearing Panel on September 4, 2025.
- 5) A copy of Ms. Grutchfield's email to me on August 22, 2025;
- 6) Ms. Grutchfield's letter to Ronald A. Shems, Elizabeth A. Kruska, and Laura Bozarth on August 22, 2025;
- 7) Ms. Grutchfield's email to me on September 4, 2025, and;

- 8) A copy of my emails with Ms. Grutchfield, Ronald A. Shems, and you on September 25, 2025.

Dated: January 27, 2026

By: /s/ Michael F. Hanley  
Michael F. Hanley  
Plante & Hanley, P.C.  
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