

**STATE OF VERMONT  
PROFESSIONAL RESPONSIBILITY BOARD**

In Re THOMAS MELONE,  
(Thomas Melone, Respondent)

PRB File No. 120-2025

**RESPONDENT’S MOTION FOR ENLARGEMENT OF TIME**

Unless otherwise vacated, Respondent THOMAS MELONE (“Respondent”) respectfully moves that the deadlines set forth in the March 17, 2026, Scheduling Order by sixty (60) days. Respondent is currently representing himself *pro se* but has recently engaged new legal counsel, Lisa Shelkrot. However, the current deadlines set forth in the Scheduling Order do not allow her to provide appropriate representation of Respondent given the complexity of these proceedings as well as her existing obligations. See Exhibit 1 hereto.

Under V.R.C.P. 6(b), a court may enlarge a deadline for “good cause.” The transition from self-representation to outside counsel constitutes good cause, as new counsel requires a reasonable window to review the case file. See, e.g., *Krisroywick Holding Corp. v. North East Response Svcs LLC*, 2024 Vt. Super. LEXIS 106, 2024 LX 30295 (30-day extension granted for new attorney); *Cameron v. Burke*, 153 Vt. 565, 572 A.2d 1361 (1990) (40-day extension granted to give new counsel time to prepare the case); *Russell v. Armitage*, 166 Vt. 392, 697 A.2d 630 (1997) (40-day continuance granted for new counsel to become more familiar with the case and to amass evidence to support the defense). Unless the Scheduling Order is otherwise vacated, Respondent respectfully requests a sixty (60) day extension of all deadlines set forth in the Scheduling Order to allow for Attorney Shelkrot to file a notice of appearance in these proceedings, to get up to speed on this complex case, and then proceed with depositions and trial preparation.

Dated: March 23, 2026

Respectfully submitted,  
/s/Thomas Melone  
Thomas Melone  
601 S. Ocean Blvd.  
Delray Beach, FL 33483  
Telephone: (212) 681-1120  
Facsimile: (801) 858-8818  
Thomas.Melone@AllcoUS.com

**EXHIBIT 1**

# Langrock

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## SPERRY & WOOL

March 20, 2026

**BY EMAIL**

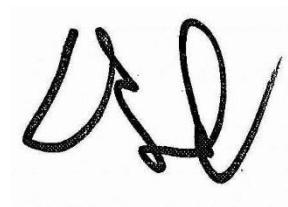
Mr. Thomas Melone  
777 West Putnam Ave,  
Suite 300  
Greenwich, CT 06830

Re: Representation in PRB Docket 25-120

Dear Thomas:

I'm writing to confirm that I would agree to enter an appearance in the above-referenced matter if there were an appropriate extension of the current scheduling order. I would not be able to provide appropriate representation given the complexity of this matter and my other obligations under the existing time constraints.

Very truly yours,



Lisa B. Shelkrot  
lshelkrot@langrock.com  
LBS:

REPLY TO: Burlington Office • WEBSITE: [www.langrock.com](http://www.langrock.com) • EMAIL: [attorneys@langrock.com](mailto:attorneys@langrock.com)

MIDDLEBURY: 111 S. Pleasant Street, Middlebury, VT 05753 • (802) 388-6356 • Fax: (802) 388-6149  
BURLINGTON: 210 College Street, Suite 400, Burlington, VT 05401 • (802) 864-0217 • Fax: (802) 864-0137

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