

STATE OF VERMONT
PROFESSIONAL RESPONSIBILITY BOARD

In Re THOMAS MELONE,
(Thomas Melone, Respondent)

PRB File No. 120-2025

RESPONDENT’S REPLY TO THE OPPOSITION OF HANLEY
RE MOTION FOR ENLARGEMENT OF TIME

Respondent THOMAS MELONE (“Respondent”) hereby responds to Hanley’s Opposition (the “Opposition”) to Respondent’s Motion for Enlargement of Time (the “Motion”).

I. Attorney Shelkrot’s Letter.

Despite having a conversation with Attorney Shelkrot about her intentions in these proceedings prior to the filing of the Motion, Hanley now seeks to cast doubt on Attorney Shelkrot’s intentions before the Hearing Panel. To avoid any further feigned confusion, attached is a revised letter from Attorney Shelkrot (*see* **Exhibit 1** hereto). Moreover, it should go without saying that if the 60-day request was not sufficient for Attorney Shelkrot, Respondent would have requested a longer extension.

II. V.R.Civ.P. 40(d)(1) is Not Applicable.

Chapter VI of the V.R.Civ.P. (Trials) relates solely to trials. No trial has been set in these proceedings and, therefore, V.R.Civ.P. 40(d)(1) is simply not applicable.

Mr. Hanley admits as much by referencing *In re Watts*, 2024 VT 598. In that case, it was **after the hearing panel scheduled a merits hearing** when the respondent sought to bring in counsel in that case. It was also, as Mr. Hanley concedes, **two years after the filing of the petition** against the respondent in *Watts* that a new counsel was brought in. Whereas in these proceedings, the petition was filed less than 6 months ago, no trial has been scheduled, and was delayed by over a month due to Mr. Hanley’s motion that resulted in the recusal of Mimi Brill and thus no hearing panel chair. On that basis, *Watts* is clearly distinguishable.

Respondent again 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 25, 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

SPERRY & WOOL

March 25, 2026

BY EMAIL

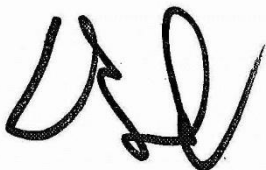
Mr. Thomas Melone
777 West Putnam Ave,
Suite 300
Greenwich, CT 06830

Re: Representation in PRB Docket 25-120

Dear Thomas:

I'm in receipt of Disciplinary Counsel's Opposition to Respondent's Motion for Enlargement of Time in which he calls into question my expressed intent to enter an appearance in the above-referenced matter, as indicated in my letter dated March 20, 2026. My use of the conditional mood in my previous letter was intended to be grammatically appropriate (I *would* enter an appearance *if* an appropriate continuance were granted), rather than evasive. I have in fact been engaged to represent you and intend to enter an appearance upon the requested extension being granted. I conveyed the same to Mr. Hanley in a telephone conversation on March 20, and am surprised that he expresses any confusion about my intent.

Very truly yours,



Lisa B. Shelkrot
lshelkrot@langrock.com
LBS:

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**STATE OF VERMONT
PROFESSIONAL RESPONSIBILITY PROGRAM**

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

CERTIFICATE OF SERVICE

I certify that on March 25, 2026, I sent the attached **RESPONDENT'S REPLY TO THE OPPOSITION OF HANLEY RE MOTION FOR ENLARGEMENT OF TIME** by email to and a Certificate of Service to merrick.grutchfield@vtcourts.gov with a copy to Michael Hanley at mfhanley@plantehanley.com.

By: /s/ Thomas Melone
Thomas Melone
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Thomas.Melone@AllcoUS.com
212-681-1120