

STATE OF VERMONT

SUPERIOR COURT
Orange Unit

CIVIL DIVISION
Docket No. 23-CV-02848

JOHN DURKEE, EXECUTOR OF)
THE ESTATE OF KENNETH H.)
BLAISDELL, JR.,)
Plaintiff,)
v.)
TRINI BRASSARD, COURTNEY)
BRASSARD, BRIAN FALZO, DANIEL)
BRASSARD, AND BRASSARD)
SUGARWORKS AND MAPLE)
SUPPLY, LLC,)
Defendants.)

SUPPLEMENTAL AFFIDAVIT OF ELIZABETH WILLHITE
In Support Of
PLAINTIFF'S MOTION FOR SANCTIONS

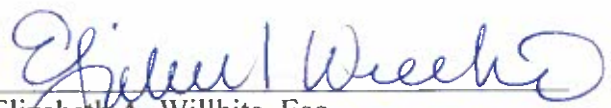
NOW COMES Elizabeth A. Willhite, Esq., and being duly sworn, hereby deposes and certifies pursuant to Rule 26(h) and Rule 11:

1. I am over the age of 18 and otherwise competent to testify.
2. I am an attorney at Primmer Piper Eggleston & Cramer PC, which represents Plaintiff John Durkee, Executor of the Estate of Kenneth H. Blaisdell, Jr. ("Plaintiff") in this matter. Richard Windish is lead counsel on this case and I am working with Attorney Windish to prosecute these claims.
3. Plaintiff filed a *Motion for Sanctions* with this Court on July 23, 2025.
4. Defendant Daniel Brassard supplemented his document production on July 24, 2025.
5. Plaintiff has reviewed this supplemental production, and now supplements the earlier facts as follows:

- a. Defendant Daniel Brassard produced some deposited checks in unredacted form on July 24, 2025;
 - b. Defendant Daniel Brassard has not produced deposited checks or deposit slips for Brassard Sugarworks and Maple Supply, LLC accounts; and
 - c. Defendant Daniel Brassard has not produced deposited checks or deposit slips from November 17, 2020 through December 31, 2021 for any of his personal or business banking accounts.
6. Plaintiff is aware that these Defendants made sizeable transactions during 2020 and 2021 which relate to the Decedent's income and Estate's assets.
 7. The parties attended a pre-mediation conference this morning.
 8. The parties intend to mediate on September 9, 2025.
 9. Plaintiff will be prejudiced if this discovery is not received before mediation.
 10. The undersigned is unable to confer further with Defendant on these issues.

Further affiant sayeth not.

DATED at Woodstock, Vermont, this 1st day of August, 2025.


Elizabeth A. Willhite, Esq.

STATE OF VERMONT)
CHITTENDEN COUNTY)

Subscribed and sworn before me, this 1st day of August 2025.



Notary Public

Commission expires on: 1/31/2027

Maura Lenore Snell
Notary Public - State of Vermont
Commission No. 0015876
Commission Exp: 1/31/2027