

STATE OF VERMONT

VERMONT SUPERIOR COURT

CIVIL DIVISION

Orange Unit

Docket No. 23-cv-02848

JOHN DURKEE, EXECUTOR OF THE ESTATE)

OF DECEDENT KENNETH H. BLAISDELL, JR.,)

Plaintiff,

V

DANIEL BRASSARD, AND)

BRASSARD SUGARWORKS AND MAPLE)

SUPPLY, LLC,)

Defendants.)

**Defendants Second request to produce to plaintiff John Durkee, Executor of the
estate of Decedent Kenneth H Blaisdell Jr**

NOW COMES Defendants Daniel Brassard, Brassard Sugarworks and Maple Supply LLC,
hereby PROPOUNDS the

within Requests to Produce to Plaintiff John Durkee, Executor of the estate of decedent
Kenneth H. Blaisdell Jr, to be

answered under oath and within the time prescribed by the Rules.

Definitions

In answering each Request to Produce, the following definitions apply:

1. "Identify" means, with respect to Records, that the answer shall state the following
information as to each such Record:

FILED
VERMONT SUPERIOR COURT

AUG - 1 2025

ORANGE UNIT

- a. the title, heading, or caption of such document if any;
- b. the identifying number, letter, or combination thereof, if any, and the significance or meaning of such, if computerized, then computer access code;
- c. the date appearing on such document, and if no date appears thereon, the answer shall so state and shall give the date, or approximate date, on which this document was prepared;
- d. the general nature or description of such document (i.e., whether it is a letter, memorandum, minutes of meeting, etc.) and the number of pages of which it consists;
- e. the name of the person who signed such document, and if it is not signed, the answer shall so state and shall give the name of the person who prepared it;
- f. the name of the person to whom such document was addressed and the name of each person, other than such addressee to whom such document, or a copy thereof, was sent; and,
- g. the name of the person who has custody of such document.

The foregoing information shall be given in sufficient detail to enable a party or person to whom a subpoena is directed to identify documents sought to be produced, and to enable Defendants to determine that such document when produced is in fact the document so described. In lieu of the identification of documents as provided for above, you may attach copies of such documents to your response and incorporate the same by reference in your response.

4. "Identify" means, with respect to any individual person, that the response shall state, to the extent known, the person's present home address, present home telephone number,

present business address, present business telephone number, present employer,
present

title, present job description, and age. If you do not know the person's present home
address, you shall so state and list the person's last known home address.

5. "Record" or "Records" means all documents, communications, text messages, emails,
social media posts, video and audio recordings, photographs, memoranda, letters,
reports,

notes, tabulations, computations, lists, journals, diaries, calendars, drawings,
photographs, videos, sketches, charts, graphs, and other similar objects or written things
regardless of format or characteristics, including electronically stored information (ESI),
digital and electronic records, computer files or other recorded data, and every other type
of data compilation from which information can be obtained, translated or transcribed,
whether originals or copies. "Record" or "Records" shall include all documents, objects,
and similar things prepared by or in the possession, custody, or control of Defendants or
their agents, representatives, or attorneys.

6. "Plaintiff" means Plaintiff John Durkee, Executor of the Estate of Decedent Kenneth H.
Blaisdell, Jr.

7. "Decedent" means Kenneth H. Blaisdell, Jr.

8. "Area map" - Satellite image with outlines of the parcels.

9. "Sprague Farm" - Keith Sprague who currently rents land from the estate

10. "WB Rogers Inc." excavation company who rents/uses the estates land

11. "Danielle Mowery" - Geoff Gilman's girlfriend who does the accounting for WB Rogers
Inc.

12. "Geoff Gilman" - Operates as WB Rogers Inc. Also does business as Gilman Excavation

13. "Randy Gilman" - VP of WB Rogers inc.

14. "Gilman Excavation" - Geoff Gilman's secondary business

15. "Thad Blaisdell" - Beneficiary to the Kenneth H Blaisdell Estate

16. "Martha Blaisdell" - Thad's wife

Instructions

1. In answering these Requests to Produce, you must furnish all records in your possession, custody, or control, including all information in the possession, custody, or control of any person acting on your behalf. If you do not possess all of the information requested in an Request to Produce, you must provide as much of the information as you do possess.
2. If any answer is based on information and belief rather than personal knowledge, state that it is made on that basis and identify the name of the person who provided the information.
3. In construing these Requests to Produce: (i) the singular shall include the plural and the plural shall include the singular; (ii) masculine or feminine pronouns shall not exclude other genders; (iii) the conjunctions "and" and "or" shall be read either disjunctively or conjunctively so as to be applied as broadly as possible and to bring within the scope of the Request all information that might otherwise be construed to be outside its scope; (iv) each of the words "all," "each," "any," and "every" shall be deemed to include each of the other functional words; (v) the definition of each term defined above shall be used regardless of whether the term is capitalized; and (vi) the past tense of a verb used herein includes the present tense and the present tense includes the past tense. In every such instance, the specific Request shall be construed in the broadest sense so as to call for the most complete and inclusive answer.
4. For all records requested herein that have been destroyed or otherwise discarded, identify

each such destroyed or discarded document and state:

- a. the date it was destroyed or discarded;
- b. the reason it was destroyed or discarded; and,
- c. the name of the person responsible for destroying or discarding it.

5. Where information or documentation requested is objected to on grounds of privilege or deemed non-discoverable on grounds of privilege or for any other reason, please: (i) identify each item of information or document so claimed to be protected by privilege or otherwise non-discoverable; (ii) describe, generally, the nature of the information or the type of documentation not being produced without disclosing its substance; (iii) state the nature of the claim or privilege or ground for non-disclosure being asserted; and (iv) state the facts relied on for the claim of privilege or non-disclosure.

6. These requests for production of documents shall be deemed continuing. When necessary to reflect events occurring and information becoming available after the filing of your initial responses, you are to promptly supplement your responses to these requests to produce.

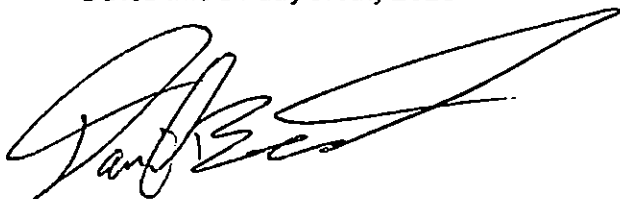
Definitions:

Requests for production

1. Produce a detailed area map of the estates property/parcels that have been rented to Sprague Farm by year.
2. Produce any documents you have received or requested from WB Rogers Inc. Danielle Mowrey, Geoff Gilman, Randy Gilman, or Gilman Excavation.
3. Produce all emails between yourself and WB Rogers Inc. Gilman Excavation, Danielle Mowery, Randy Gilman, or Geoff Gilman
4. Produce all records provided by or interacting with Thad Blaisdell or Martha Blaisdell, and John Durkee or any counsel for the estate of Kenneth H Blaisdell

including but not limited to John Page; Zalinger, Cameron & Lambek; Mainstreet Law; or Pimmer, Piper, Eggleston & Cramer PC.

Dated this 31 day of July 2025

A handwritten signature in black ink, appearing to read 'Daniel Brassard', with a long, sweeping horizontal stroke extending to the right.

Daniel Brassard

Brassard Sugarworks and Maple Supply LLC

STATE OF VERMONT

SUPERIOR COURT

Orange

Unit

Civil

DIVISION

Docket No. 23-CV-02848

Est of Kenneth Blaisdell v. Trini Brassard, et al

CERTIFICATE OF SERVICE

I certify that I have today delivered the following documents to all other parties to this case:

Request to produce

- ☐ By first class mail by depositing it in the U.S. mail;
- ☐ By personal delivery to _____ or his/her counsel;
- ☒ Other: Explain: via Email

The names and addresses of the parties/lawyers to whom the mail was addressed or personal delivery was made are as follows: (Attach additional sheets, if necessary)

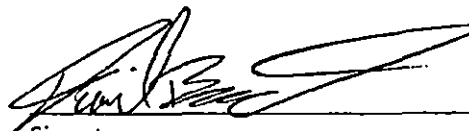
Name

Brian FalzoTrini Brassard - Barney BrannenCourtney Brassard- Todd SteadmanRich WindishElizabeth Wilhite

Address

Firefighter82093@aol.combbrannen@brannen_loftus.comsteadman@whiteriverlawyers.comrwindish@primmer.comewillhite@primmer.com

Dated

7-31-2025


Signature

Daniel Brassard

Print Name

Counsel

FILED
VERMONT SUPERIOR COURT

AUG - 1 2025