VERMONT SUPERIOR COURT
Orange Unit

CIVIL DIVISION
Docket No. 23-cv-02848

DANIEL BRASSARD, BRASSARD SUGARWORKS

AND MAPLE) SUPPLY, LLC,) Defendants.)

v.))

JOHN DURKEE, EXECUTOR OF THE ESTATE)

OF DECEDENT KENNETH H. BLAISDELL, JR.,) Plaintiff,))

DISCOVERY CERTIFICATE

I, Daniel Brassard Pro SE hereby certify that on the 24th day of September 2024, I served DEFENDENT'S FIRST SET OF INTERROGATORIES, ADMITS AND REQUESTS TO PRODUCE TO PLAINTIFF John Durkee and to the below identified counsel and parties of record, via e-mail:

Rich Windish, Esq. (For John Durkee) Rwindish@primmer.com

Todd Steadman, Esq. (for Courtney Brassard) steadman@whiteriverlawyers.com,

Barney Brannen, Esq. (for Trini Brassard) bbrannen@brannen-loftus.com,

Brian Falzo, Pro Se firefighter82093@aol.com

DATED, this 24th day of September 2024.

Daniel Brassard

Brassard Sugarworks and Maple Supply LLC

FILED
VERMONT SUPERIOR COURT

SEP 24 2024

ORANGE UNIT

Vermont Superior Court

Orange Unit

Civil Division

Docket No. 23-cv-02848

Defendant Daniel Brassard

Brassard Sugarworks and Maple Supply LLC

V.

John Durkee, *executor of the estate of*

Decedent Kenneth Blaisdell JR

Defendents interrogations, requests to produce and Admit to Plaintiff John Durkee, Executor of the estate of decedent Kenneth Blaisdell, JR

Here are defendant Daniel Brassard, Brassard Sugarworks and Maple Supply LLC are *pursuant* to V.R.C.P. 26 et. *Seq., V.R.C.P. 36* hereby PROPOUNDS the within Interrogatories, admits and Requests to produce to Plaintiff John Durkee, to be answered under oath and within the time prescribed by the Vermont Rules of Civil Procedure.

Definitions

1. "Sugaring" means anything to do with the production of maple syrup
2. "Identify" *means who you have talked to*
3. "Background" Previously worked with or have done before.
4. "Current Use" Vermont's tax saving program on larger parcels of land
5. "ACT 250" permits for gravel extraction
6. "Factual" true facts
7. "Material" Gravel or sand

FILED
VERMONT SUPERIOR COURT

SEP 24 2024

ORANGE UNIT

8. “Hay” round bales of grass

9. “Bulldozer” John Deere 450 piece of equipment owned by the Decedent

10. “Decedent” Kenneth Blaisdell Jr

11. “Sugaring equipment” equipment in Thad’s possession paid for by Decedent listed on the decedent's depreciation schedule 2021

12. “Record” or “Records” means all documents, communications, text messages, emails, phone calls,

13. “Thad” means Thad Blaisdell beneficiary of the decedent

14. “102.9 acres” is a plot of land owned by the decedent located at 505 VT RT 14 N, East Randolph, VT

15. “You” or “Your” means Plaintiff John Durkee

16. “Grazing” cows eating grass while in a pasture

17. “Estate Land” any track/parcel of land owned by the Estate

18. “My” refers to Daniel Brassard/Brassard Sugarworks and Maple Supply LLC

19. “The Tax Team” Tax service the decedent used prior to 2021 who specializes in agricultural tax's.

Instructions

1. Answer all interrogatories, admits and requests to produce, please produce and furnish all records in your possession. Answer these to the best of your ability.

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, and what effort was put in to confirm said information.

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

Interrogatories

1. State your full name

2. Highest level of education and/or degree awarded

3. Current occupation and experience with probate matters.

4. Background in working with the Current use Program

5. Background with complying with ACT 250 and/or gravel extraction sites.

6. Background with mining safety

7. Please produce any/all "Factual" records you have regarding my "Sugaring" business and where these records came from.

8. Please produce a list of all persons you have had any conversation or interaction with along with a description of the conversation or interaction about my "Sugaring" activities.

9. Please produce all records of your response to the July 2023 Flooding that occurred on estate property, including extent of damage and what was done for repairs.

10. Please produce a list of all customers of the estate that discontinued any purchases of materials from the estate. Provide any reasons for this discontinuance.

11. Please share your reasoning for not selling the estates "Bulldozer" with the rest of the equipment and any evidence you have to support your answer.

12. Provide your education, experience and any background in the production or sale of hay,.permitting of extraction activities, management of aggregate sales and MSHA compliance.

13. From the date you were appointed please describe how you did inventory of the estate assets and secured them to prevent theft and the date this was completed.

Requests to Admit

1. Admit the "Bulldozer" is listed on the decedent's depreciation schedule for tax year 2021 that was provided to you from The "Tax Team".

2. Admit to not selling the "Bulldozer" because one beneficiary "claims" it was gifted to them.

3. Admit there is no actual evidence of the Bulldozer being gifted, and the "Deadman statue" should apply.

4. Admit even with invoice copies and cancelled checks you still refuse to investigate the Sugaring equipment listed on the decedent's depreciation schedule.

4. Admit to contacting Thad directly or requiring others to contact him to discuss all activities on the 102.9-acre parcel even though he does not have any control of it.

5. Admit over the course of your management of the estate you never noticed cows grazing on estate land until 2024.

6. Admit that you have not once had a one-on-one conversation of the role I played in my grandfather's haying operations from 2013-2021

7. Admit you let an individual you did not know operate the skid steer owned by the estate with no prior knowledge of them, or you knowing if they had any experience of operating one.

8. Admit to having conversations with multiple people outside the estate and claiming "You're losing sleep at night" over this estate and "didn't realize how complicated it would be"

9. Admit to asking a customer of the estate months after you were appointed to "Show you the property and the boundaries" as you did not know them.

10. Admit to selling the remainder of the estates round bales at a considerably lower price than what they were sold for that winter.

11. Admit to letting the estates enrollment in current use expire for only one parcel, resulting in a withdrawal penalty and higher tax's.

12. Admit to the over extraction of volumes allowed in ACT 250 permit under your management that could result in monetary fines at the most northern gravel pit on Vermont Route 14 owned by the estate.

13. Admit to meeting Thad on estate property in the spring of 2024 with no representation present on either side.

Requests for production

1. With respect to each and every response to the foregoing Interrogatories and admits, produce all documents identified in your response.
2. Produce any document and/or photo showing all agriculture equipment owned by the estate shortly after you took over.
3. Produce photos or documents of the equipment at the auction site prior to being sold.
4. Produce all documents that record any damage that was done to the equipment from the time it left the estate land to the time it was sold.
5. Produce all records showing the amount of bale wrap purchased by the estate from 2013-2021.
6. Produce all records showing the amount of net wrap purchased by the estate from 2013-2021.

Date this 24th Day of September 2024

Daniel Brassard

Brassard Sugarworks and Maple Supply LLC