

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.)

**DISCOVERY STIPULATION AND ORDER REGARDING
DOCUMENT PRODUCTION BY DEFENDANT DANIEL BRASSARD**

NOW COMES the parties, by and through counsel, and hereby STIPULATE and
AGREE as follows:

1. On or before January 30, 2026, Defendant Daniel Brassard, by and through counsel, shall produce to Plaintiff legible, unredacted copies of the following categories of documents, for all bank accounts associated with Defendant Daniel Brassard, personal and business, including but not limited to Brassard Sugarworks and Maple Supply, LLC and Brassard Self Storage, for the time period from July 28, 2013 to April 10, 2021 (the date of Kenneth Blaisdell's death):
 - a. monthly bank statements showing deposits, withdrawals, and balances;
 - b. canceled checks; and,
 - c. deposit slips with associated checks.

2. At the time of production, Defendant Daniel Brassard shall also furnish to Plaintiff's counsel a valid, signed release of information, allowing Plaintiff to directly obtain documents from each bank.
3. If Plaintiff utilizes the release to obtain records, Plaintiff shall notify counsel for Defendant Daniel Brassard in advance, and shall provide a copy of any and all documents obtained through the use of the release upon receipt.
4. In exchange for this agreement, Plaintiff agrees to withdraw the motion for sanctions without prejudice.
5. Defendants Daniel Brassard and Brassard Sugarworks and Maple Supply, LLC further agree that they will not challenge any request by Plaintiff for an award of attorneys' fees relating to Plaintiff's motions to compel and/or motion for sanctions, on the basis that the motion for sanctions has been withdrawn. Defendants retain all other rights to challenge the appropriateness and reasonableness of any attorneys' fees request by Plaintiff.

DATED at Woodstock, Vermont, this 24th day of December, 2025.

PRIMMER PIPER EGGLESTON & CRAMER PC

By: /s/ Richard Windish

Richard J. Windish, Esq.

***Attorneys for John Durkee, Executor of the Estate
of Kenneth H. Blaisdell, Jr.***

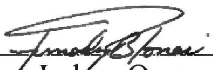
DATED at Hanover, New Hampshire, this 24th day of December, 2025.

BRANNEN & LOFTUS, PLLC

By: /s/ Joseph Tremblay

***Attorneys for Defendants Daniel Brassard and
Brassard Sugarworks and Maple Supply, LLC***

APPROVED AND SO ORDERED:



Presiding Judge, Orange Superior Court

1/2/2026

Vermont Superior Court
Filed 01/05/26
Orange Unit