

EXHIBIT

A

STATE OF VERMONT

SUPERIOR COURT
Orange Unit

CIVIL DIVISION
Case No. 23-CV-02848

JOHN DURKEE, EXECUTOR OF THE
ESTATE OF DECEDENT [KENNETH] H.
BLAISDELL, JR.,
Plaintiff,

v.

TRINI BRASSARD, COURTNEY BRASSARD,
BRIAN FALZO, DANIEL BRASSARD, AND
BRASSARD SUGARWORKS AND MAPLE
SUPPLY, LLC,
Defendants.

CONFIDENTIALITY STIPULATION AND ORDER

NOW COME the Plaintiff, John Durkee (“Mr. Durkee”), Executor of the Estate of Kenneth H. Blasidell, Jr., by and through his attorneys, Primmer, Piper, Eggleston & Cramer, P.C., and Defendant, Trini Brassard (“Ms. Brassard”), by and through her attorneys, Brannen & Loftus, PLLC, and hereby STIPULATE and AGREE to the following:

1. This Confidentiality Stipulation and Order (hereinafter, “Order”) shall govern the production of financial documents to include, without limitation, Ms. Brassard’s personal financial records and information (“Confidential Information”).
2. To the extent either Party has already produced Confidential Information, the Parties agree that this Order will apply to such Confidential Information already produced and documentation to be produced.
3. Confidential Information shall be used by the Parties solely for purposes of preparing for and conducting the litigation and/or settlement of this matter (including any related

appellate proceedings). Confidential Information may not be used or disseminated for any other purpose.

4. Confidential Information shall only be disclosed or made available by the Party receiving such information to “Qualified Persons” who shall consist solely of:
 - a. The Court, court personnel, and court reporters;
 - b. Mr. Durkee and Ms. Brassard;
 - c. Counsel to the Parties (including necessary members and employees of the Parties’ counsel and duplication or processing services retained by such counsel);
 - d. Deposition witnesses, only after review of and agreement to the terms of this Order, evidenced by signing a copy of this Order; and, in the event the deposition witness will not sign this Order, the Parties agree to obtain a further Court Order to assure confidentiality prior to the disclosure of Confidential Information;
 - e. Any person engaged by counsel to the parties in this matter or by the Parties to assist in litigation, including experts, consultants or others who are assisting a Party’s counsel in this matter, and if confidential information is to be disclosed to such person, he or she shall review and agree to the terms of this Order on behalf of himself and his staff; and
 - f. Mediator(s) retained jointly by the parties.
5. Other than as set forth in Paragraph 4, Confidential Information may not be disclosed to any other person absent a further Court Order authorizing such disclosures.
6. Qualified Persons (except for those identified in Paragraph 4(a)) and any person receiving such information pursuant to Paragraph 4, shall hold Confidential Information in confidence, and may only use and disclose such information as authorized by this Order.

7. To the extent any Party wishes to use any Confidential Information in connection with any pleading or other out-of-court submission to the Court, such submission must be filed with the Court under seal.
8. The Parties may disclose Confidential Information as needed during the course of any hearing, trial, or other proceeding in open Court (including in connection with obtaining testimony from any witness, making offers of proof, etc.) and either Party may at his or her option ask the Court at the time to hold such Confidential Information in a sealed file.
9. Nothing herein shall be construed to impact in any way the admissibility of any document, testimony, or other evidence at trial in this matter. Nothing herein shall required the disclosure of material which counsel for any Party contends is protected from disclosure by the attorney-client privilege, the work product doctrine, or any other applicable privilege, nor shall anything herein constitute a waiver of any claim of privilege or other protection from discovery. Nothing herein shall be deemed as a modification or expansion of the scope of the rules of civil procedure and evidence with respect to the discoverability and/or admissibility of any document or other information or materials produced during the course of this matter. Nothing in this Order shall be deemed to preclude a Party from seeking and obtaining, on an appropriate showing, additional protection with respect to the confidentiality of documents, testimony, court papers, or other matters.
10. Nothing herein shall be construed to limit in any way either Party's individual or personal use of Confidential Information related specifically to that Party's Confidential Information.

11. If Confidential Information is disclosed to any person other than in the manner authorized by his Order, the Party responsible for the disclosure shall, upon learning of the disclosure, inform undersigned counsel and shall make every reasonable effort to retrieve the materials and prevent disclosure by the unauthorized person who received such information.
12. The termination of this matter shall not relieve any Party to whom Confidential Information has been disclosed from the obligations of this Order. Counsel for each Party may retain one copy of Confidential Information contained in his/her files provided that confidentiality continues to be preserved. All duplicate copies shall be destroyed or returned to the producing Party.
13. This Order may be modified only with the written consent of all Parties hereto or by Court order.

DATED at Woodstock, Vermont, this ____ day of September, 2024.

By: _____

Richard Windish, Esq.

Elizabeth Willhite, Esq.

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

DATED at Hanover, New Hampshire this ____ day of September, 2024.

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Brannen & Loftus, PLLC
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Attorney for Trini Brassard

So Ordered:

Presiding Judge