

EXHIBIT

A

STATE OF VERMONT

VERMONT SUPERIOR COURT
Orange Unit

CIVIL DIVISION
Docket 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.)

**PLAINTIFF'S FIRST SET OF INTERROGATORIES
AND REQUESTS TO PRODUCE TO DEFENDANT COURTNEY BRASSARD**

NOW COMES Plaintiff JOHN DURKEE, EXECUTOR OF THE ESTATE OF
DECEDENT KENNETH H. BLAISDELL, JR., by and through his attorneys, PRIMMER PIPER
EGGLESTON & CRAMER, PC, and pursuant to V.R.C.P. 26 et. seq., hereby PROPOUNDS the
within Interrogatories and Requests to Produce to Defendant COURTNEY BRASSARD, to be
answered under oath and within the time prescribed by the Rules.

Definitions

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

1. "Address" means, unless otherwise specified, the business and residence address,
including city or town and zip code, and business and residence telephone number
(including extension, if any).
2. "Complaint" means the Complaint filed by the Plaintiff in this action.
3. "Identify" means, with respect to Records, that the answer shall state the following
information as to each such Record:

- 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. "You" or "your" means Defendant Courtney Brassard and her respective attorneys, agents, and any other person acting on her behalf or at her instruction.
8. “Occupied Parcel” means 101.7 acres located at 1330 Rte 14 North, Randolph, VT.
9. “Decedent” means Kenneth H. Blaisdell, Jr.
10. “POA Agent” means Trini Brassard.

Instructions

1. In answering these Interrogatories and 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 Interrogatory or 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 Interrogatories and 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 interrogatories and 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 interrogatories.

Interrogatories

- 1. State your full name, date of birth, home address, occupation, and business address.
- 2. List the highest degree you have obtained , including the name of the school and the degree awarded.
- 3. Identify all banking or other financial institutions where you have held personal or business accounts from July 18, 2013 to the present.
- 4. Identify all banking or other financial institutions where you have obtained mortgages from July 18, 2013 to the present, the purpose for those mortgages and any collateral offered.

5. Identify all real estate and/or real property that has been deeded to you from July 18, 2013 to the present, including the address, lot number, town or village, date deeded, and the amount paid by you for said property.
5. Identify all credit card accounts in your name open during any portion of the period July 18, 2013 to the present.
6. Identify all monies received by you from July 18, 2013 to the present from the Decedent and/or the Decedent's POA Agent, including the date, amount and type of monetary transaction, such as gifts, payments for work, reimbursement for expenses, etc.
7. Identify all monies paid on your behalf to any creditor of yours from July 18, 2013 to the present by the Decedent, and/or the Decedent through his POA Agent, including the date, amount and type of monetary transaction.
8. Identify all gifts purchased for you from July 18, 2013 to the present by the Decedent, and/or the Decedent through his POA Agent, including the date, amount and type of gift, such as a motor vehicle, mobile home, etc.
9. Identify all items purchased on your behalf from July 18, 2013 to the present by the Decedent, and/or the Decedent through his POA Agent, including the date, amount and type of item.
10. Identify all of your sources of income from July 18, 2013 to the present, including the name and address of the source of income and the amount and nature of the income, such as wages, contractor payments, interest, rental income, the sale of goods or property etc.
11. Identify any payments you have made to the Decedent from July 18, 2013 to the present, including an explanation of the reason such payment was made.

12. Identify any leases entered into between you and the Decedent from July 18, 2013 to the present.
13. Identify your address as of July 18, 2013, including the address, city, state and full name with contact information for all cohabitants residing at the same location.
14. Identify your address as of January 31, 2014, including the address, city, state and full name with contact information for all cohabitants residing at the same location.
15. Describe the role, if any, that you played in caring for the Decedent; including but not limited to the number of hours each week dedicated to providing care, the role you played in managing medications, and the names and addresses of any other person(s) who provided similar care
16. Describe your legal relationship to Co-Defendant Brian Falzo, including when this relationship began.
17. Describe your current profession, including any licenses or certifications you have obtained to pursue this career, as well as any ownership interest you have in a business.
18. Describe what portion of the Occupied Parcel where you currently reside is used to produce hay, and provide the names and addresses of all individuals you have sold hay to in the past five years.
19. Describe what portion of the Occupied Parcel where you currently reside is used to produce gravel, and provide an exact accounting of all gravel income received by you including any barter transactions related to the extraction of gravel at this same property.
20. Describe what portion of the Occupied Parcel where you currently reside was used to produce timber, and provide an exact accounting of all timber income received by you since you took possession of this same parcel.

21. Identify all transactions related to the Commodore Astro Mobile Home where you were either the buyer or the seller, including the source of funds used to purchase and the location where funds were deposited after the sale.
22. Describe the renovations completed on the Commodore Astro Mobile Home, including the name of all contractors hired, the estimates and invoices related to the same, receipts for purchase of materials, and copies of cancelled checks or credit card purchases for payment of all work.
23. Describe the work paid for by you to close the gravel pit at the Occupied Parcel, including the contractors hired, the estimates and invoices related to the same, receipts for purchase of materials, and copies of canceled checks or credit card purchases for payment of all work.

Requests for Production

1. 1. With respect to each and every response to the foregoing Interrogatories, produce all documents identified in your response.
2. With respect to all payments made or received, produce all written or electronic evidence of such payments including but not limited to canceled checks, wire transfer confirmations, deposit slips and receipts. Include any and all deposit slips and/or copies of the check(s) corresponding to each such deposit.
3. With respect to all real estate identified in response to the foregoing Interrogatories, produce copies of deeds and proofs of payment for the property.
4. With respect to any item purchased either in full or in part for you or on your behalf that required a title, including but not limited to a car, truck, mobile home, or motor home, produce a copy of such document.

5. With respect to any item purchased either in full or in part for you or on your behalf that required a title, including but not limited to a vehicle, ATV, mobile home, or motor home, produce a copy of such document.
6. With respect to income from hay, gravel, or timber sales, copies of invoices, produce copies of any and all cancelled checks, barter transaction invoices or bills of sales, any communication with vendors or individuals who made these purchases, and deposit slips from banks where income was deposited.
7. Produce a complete copy of your Federal and State income tax returns from 2013 to the present, including all depreciation schedules and all source documents related to each return (including but not limited to W-2's, 1099s, and all schedules to each such tax return such as K-1s, and copies of invoices and bills of sale for any assets purchased or sold).
8. With respect to all banks and other financial institutions at which you have held an account from July 18, 2013 to date, produce a copy of your monthly bank statements and copies of canceled checks, deposit slips, and wire transfer confirmations.
9. Produce a complete copy of Vermont Department of Motor Vehicle records linked to your driver's license, and/or your name from July 18, 2013 to date, including new registrations for cars, trucks, trailers, motor homes, farm equipment, ATVs, boats, and campers.
10. Produce a complete copy of any and all communications between yourself and W.B. Rogers Gravel.
11. Produce a complete copy of any and all communications between yourself and Defendant Trini Brassard about caregiving for the Decedent.

12. Produce a complete copy of any and all communications between yourself and any person that in any way refers to the transfer of land from the Decedent to yourself and Brian Falzo.

DATED at Woodstock, Vermont, this 29TH day of September, 2023.

By: /s/ Richard Windish
Richard Windish, Esq.

/s/ Elizabeth Willhite
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