

## Elizabeth Willhite

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**From:** Elizabeth Willhite  
**Sent:** Friday, April 4, 2025 12:55 PM  
**To:** Barney Brannen; Joseph D. Tremblay; Todd Steadman  
(Steadman@whiteriverlawyers.com); Daniel Brassard (brassardsugarworks@gmail.com); firefighter82093@aol.com  
**Cc:** Richard Windish; Maura Snell; Maggie Huston  
**Subject:** RE: Estate of Blaisdell v T.Brassard et al.  
**Attachments:** 2025-04-03 Redlined from Plf Revised Proposed Confidentiality Stipulation and Order - DRAFT(7056418.1).docx

Afternoon,

Our edits are attached. Plaintiff objects to the concept of a Special Master. Plaintiff objects to the lengthy process laid out in this Agreement related to the Special Master. Last fall this was not raised, and we do not believe circumstances have changed so much since then that a special master is warranted now. The main reasons Plaintiff objects to a special master are: (1) this process will delay an already delayed discovery period and (2) this process will cost the Estate additional legal and professional fees which are unnecessary.

Otherwise, Plaintiff assents to the agreement as provided, and sends back a redlined version for your consideration.

We ask that the parties reconsider their request to appoint a special master. We have a hearing at the end of this month with Judge Richardson. Assuming the parties cannot reach an agreement on this one section of the Agreement, we suggest filing a joint memorandum related to the confidentiality agreement issue, and inform the Court in this filing about our difference of opinion related to a special master. Prior to that filing, we ask for a discovery conference to discuss.

Please either: (1) agree to the changes proposed or (2) send dates and times for a discovery conference.

Best regards,  
Beth

**Elizabeth A. Willhite** | Attorney at Law

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**please copy my legal assistant Maura Snell (msnell@primmer.com) on all communications**

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**From:** Barney Brannen <bbrannen@brannen-loftus.com>  
**Sent:** Friday, April 4, 2025 12:31 PM  
**To:** Elizabeth Willhite <ewillhite@primmer.com>; Joseph D. Tremblay <jtremblay@brannen-loftus.com>; Todd

Steadman (Steadman@whiteriverlawyers.com) <Steadman@whiteriverlawyers.com>; Daniel Brassard (brassardsugarworks@gmail.com) <brassardsugarworks@gmail.com>; firefighter82093@aol.com  
**Cc:** Richard Windish <rwindish@primmer.com>; Maura Snell <msnell@primmer.com>; Maggie Huston <mhuston@brannen-loftus.com>  
**Subject:** RE: Estate of Blaisdell v T.Brassard et al.

**External sender** <[bbrannen@brannen-loftus.com](mailto:bbrannen@brannen-loftus.com)>

Make sure you trust this sender before taking any actions.

All – I’ve attached (in Word and PDF versions) a draft of a proposed confidentiality stipulation and order. I’ve confirmed with Todd (on behalf of Courtney) and Dan that they are both fine with this draft. – Barney

## B&L

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**From:** Elizabeth Willhite <[ewillhite@primmer.com](mailto:ewillhite@primmer.com)>

**Sent:** Friday, April 4, 2025 10:48 AM

**To:** Barney Brannen <[bbrannen@brannen-loftus.com](mailto:bbrannen@brannen-loftus.com)>; Joseph D. Tremblay <[jtremblay@brannen-loftus.com](mailto:jtremblay@brannen-loftus.com)>; Todd Steadman (<[Steadman@whiteriverlawyers.com](mailto:Steadman@whiteriverlawyers.com)> <[Steadman@whiteriverlawyers.com](mailto:Steadman@whiteriverlawyers.com)>; Daniel Brassard (<[brassardsugarworks@gmail.com](mailto:brassardsugarworks@gmail.com)> <[brassardsugarworks@gmail.com](mailto:brassardsugarworks@gmail.com)>; <[firefighter82093@aol.com](mailto:firefighter82093@aol.com)>

**Cc:** Richard Windish <[rwindish@primmer.com](mailto:rwindish@primmer.com)>; Maura Snell <[msnell@primmer.com](mailto:msnell@primmer.com)>; Maggie Huston <[mhuston@brannen-loftus.com](mailto:mhuston@brannen-loftus.com)>

**Subject:** RE: Estate of Blaisdell v T.Brassard et al.

Thank you for the update.

**Elizabeth A. Willhite** | Attorney at Law

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**From:** Barney Brannen <[bbrannen@brannen-loftus.com](mailto:bbrannen@brannen-loftus.com)>

**Sent:** Wednesday, April 2, 2025 3:23 PM

**To:** Elizabeth Willhite <[ewillhite@primmer.com](mailto:ewillhite@primmer.com)>; Joseph D. Tremblay <[jtremblay@brannen-loftus.com](mailto:jtremblay@brannen-loftus.com)>; Todd Steadman (<[Steadman@whiteriverlawyers.com](mailto:Steadman@whiteriverlawyers.com)>) <[Steadman@whiteriverlawyers.com](mailto:Steadman@whiteriverlawyers.com)>; Daniel Brassard (<[brassardsugarworks@gmail.com](mailto:brassardsugarworks@gmail.com)>) <[brassardsugarworks@gmail.com](mailto:brassardsugarworks@gmail.com)>; [firefighter82093@aol.com](mailto:firefighter82093@aol.com)

**Cc:** Richard Windish <[rwindish@primmer.com](mailto:rwindish@primmer.com)>; Maura Snell <[msnell@primmer.com](mailto:msnell@primmer.com)>; Maggie Huston <[mhuston@brannen-loftus.com](mailto:mhuston@brannen-loftus.com)>

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Beth – In hopes of coming up with a single draft that all parties from whom the Estate has sought discovery can agree on before sending it to you, I’ve sent a draft of proposed stipulation and order to Trini and to Todd and Dan (I didn’t include Brian, as I don’t think the Estate has sought any written discovery from him, so he would not be subject to the stipulation or order). I expect/hope to be back to you promptly with a proposed draft. – Barney

## B&L

Barney L. Brannen

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**From:** Elizabeth Willhite <[ewillhite@primmer.com](mailto:ewillhite@primmer.com)>

**Sent:** Tuesday, April 1, 2025 12:59 PM

**To:** Barney Brannen <[bbrannen@brannen-loftus.com](mailto:bbrannen@brannen-loftus.com)>; Joseph D. Tremblay <[jtremblay@brannen-loftus.com](mailto:jtremblay@brannen-loftus.com)>; Todd Steadman (<[Steadman@whiteriverlawyers.com](mailto:Steadman@whiteriverlawyers.com)>) <[Steadman@whiteriverlawyers.com](mailto:Steadman@whiteriverlawyers.com)>; Daniel Brassard (<[brassardsugarworks@gmail.com](mailto:brassardsugarworks@gmail.com)>) <[brassardsugarworks@gmail.com](mailto:brassardsugarworks@gmail.com)>; [firefighter82093@aol.com](mailto:firefighter82093@aol.com)

**Cc:** Richard Windish <[rwindish@primmer.com](mailto:rwindish@primmer.com)>; Maura Snell <[msnell@primmer.com](mailto:msnell@primmer.com)>; Maggie Huston <[mhuston@brannen-loftus.com](mailto:mhuston@brannen-loftus.com)>

**Subject:** RE: Estate of Blaisdell v T.Brassard et al.

Afternoon Barney,

It’s been 8 days, do you have a confidentiality agreement ready? We have 9 more days to figure this out per the court order.

Best regards,

Beth

**Elizabeth A. Willhite** | Attorney at Law

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*Please copy my administrative assistant, Maura Snell ([msnell@primmer.com](mailto:msnell@primmer.com)) on all replies or new messages.*

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**From:** Barney Brannen <[bbrannen@brannen-loftus.com](mailto:bbrannen@brannen-loftus.com)>  
**Sent:** Monday, March 24, 2025 11:58 AM  
**To:** Elizabeth Willhite <[ewillhite@primmer.com](mailto:ewillhite@primmer.com)>; Joseph D. Tremblay <[jtremblay@brannen-loftus.com](mailto:jtremblay@brannen-loftus.com)>; Todd Steadman (<[Steadman@whiteriverlawyers.com](mailto:Steadman@whiteriverlawyers.com)> <[Steadman@whiteriverlawyers.com](mailto:Steadman@whiteriverlawyers.com)>; Daniel Brassard (<[brassardsugarworks@gmail.com](mailto:brassardsugarworks@gmail.com)> <[brassardsugarworks@gmail.com](mailto:brassardsugarworks@gmail.com)>; [firefighter82093@aol.com](mailto:firefighter82093@aol.com)  
**Cc:** Richard Windish <[rwindish@primmer.com](mailto:rwindish@primmer.com)>; Maura Snell <[msnell@primmer.com](mailto:msnell@primmer.com)>; Maggie Huston <[mhuston@brannen-loftus.com](mailto:mhuston@brannen-loftus.com)>  
**Subject:** RE: Estate of Blaisdell v T.Brassard et al.

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I propose that, instead, you give me a couple of days to confer with my client and come up with a proposed, revised stipulated confidentiality order, which I'll circulate to everyone on this email for review and comment. Then we can schedule a multiparty "meet and confer" if necessary. – Barney

## B&L

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**From:** Elizabeth Willhite <[ewillhite@primmer.com](mailto:ewillhite@primmer.com)>  
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**To:** Barney Brannen <[bbrannen@brannen-loftus.com](mailto:bbrannen@brannen-loftus.com)>; Joseph D. Tremblay <[jtremblay@brannen-loftus.com](mailto:jtremblay@brannen-loftus.com)>; Todd Steadman (<[Steadman@whiteriverlawyers.com](mailto:Steadman@whiteriverlawyers.com)> <[Steadman@whiteriverlawyers.com](mailto:Steadman@whiteriverlawyers.com)>; Daniel Brassard (<[brassardsugarworks@gmail.com](mailto:brassardsugarworks@gmail.com)> <[brassardsugarworks@gmail.com](mailto:brassardsugarworks@gmail.com)>; [firefighter82093@aol.com](mailto:firefighter82093@aol.com)  
**Cc:** Richard Windish <[rwindish@primmer.com](mailto:rwindish@primmer.com)>; Maura Snell <[msnell@primmer.com](mailto:msnell@primmer.com)>  
**Subject:** Estate of Blaisdell v T.Brassard et al.

Morning Gentlemen,

Following the Court's directive, we propose the following 3 times to hold a Zoom discovery conference regarding the proposed protective order.

Tuesday March 25 at 11:00 am or 12:00 pm

Wednesday March 26 at 11:00 am

Monday March 31 at 12 pm

Tuesday April 1 at 1 pm

Best regards,  
Beth

**Elizabeth A. Willhite** | Attorney at Law

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