

EXHIBIT C

Elizabeth Willhite

From: Elizabeth Willhite
Sent: Monday, March 10, 2025 11:49 AM
To: Barney Brannen; Todd Steadman; Joseph D. Tremblay; Daniel Brassard (brassardsugarworks@gmail.com); firefighter82093@aol.com; Maggie Huston
Cc: Richard Windish; Maura Snell; Jamie Pinkham
Subject: RE: Estate of Blaisdell v Trini Brassard et al. - - Deposition of Trini Brassard, Courtney Brassard, and Daniel Brassard

Todd, March 20 and 21 do not work with our schedules, we have other depositions scheduled on those days. Does April 1 works for you and your client? We can begin in the morning or afternoon on that day.

Barney,

We need to resolve the issue of these documents before we depose your client, since you will not agree to reconvene once we receive these records. To simplify matters, we agree to re-schedule your clients deposition that is scheduled for tomorrow, unless we are able to resolve this document issue by close of business today. We are not available March 20 or 21. The next available date we have is April 1, please confirm your client's availability on that date.

Before this becomes another reason to seek court intervention, we want to be sure you and I are talking about the same documents, we are requesting the documents your client identified in her discovery responses dated December 31, 2024.

Specifically, your client's response to Interrogatory Number 2 is "we have Bates Numbered and are prepared to produce bank statements and check images for Ms. Brassard's checking and savings accounts..." the response goes on to identify the Bates range for these documents (TB00001 – TB00450). The reason stated on December 31, 2024, for not including these in the production were reliant on "if we can come to an agreement on the terms of a mutually-agreeable confidentiality order to be filed with and approved by the Court."

There are other instances in this same discovery response where your client identifies other documents by Bates label reference, and indicates production is also dependent on a mutually-agreeable confidentiality order. As you stated below, your office provided a confidentiality order. Our client agrees to it. Our client noticed other defendants wanted to seek the same protection, and we agreed to add them as parties. If you would like us to remove those parties and proceed with the original document, we agree to do so. We see no legal basis for your client to now rescind her request, it is her proposed agreement.

It appears the argument for this refusal to produce is based on the fact that too much time has passed. It is our opinion that since discovery has not closed and your client did not actually provide discovery responses to our request to produce until December 31, 2024, that assertion fails to adhere to VRCP 26, 31, and 32. Further, there is no undue burden placed upon your client to produce these documents now, since you have these documents presumably in your firm's files with Bates label references applied, as indicated by your client's December 31, 2024 discovery responses. To aid in this production, the Bates range we are missing is TB00001 – TB000729 and TB000829 – TB000832.

If these are the documents you are now refusing to produce, please confirm. If you were referring to other documents, we have miscommunicated and hope this email clarifies what documents we are seeking. If you believe a phone call to confer would be useful, let us know. Otherwise, we expect to have either the documents or a refusal to produce these documents from your client by the close of business today.

Best regards,

Beth

Elizabeth A. Willhite | Attorney at Law

PRIMMER PIPER EGGLESTON & CRAMER PC
43 Lincoln Corners Way, Suite 205 | Woodstock, VT 05091
Main: 802 864 0880 | Fax: 802 864 0328
Direct: 802 371 5202 | Cell: 802 369 0211
ewillhite@primmer.com | www.primmer.com



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

From: Barney Brannen <bbrannen@brannen-loftus.com>

Sent: Monday, March 10, 2025 10:58 AM

To: Todd Steadman <Steadman@whiteriverlawyers.com>; Elizabeth Willhite <ewillhite@primmer.com>; Joseph D. Tremblay <jttremblay@brannen-loftus.com>; Daniel Brassard (brassardsugarworks@gmail.com)

<brassardsugarworks@gmail.com>; firefighter82093@aol.com; Maggie Huston <mhuston@brannen-loftus.com>

Cc: Richard Windish <rwindish@primmer.com>; Maura Snell <msnell@primmer.com>; Jamie Pinkham <jpinkham@primmer.com>

Subject: RE: Estate of Blaisdell v Trini Brassard et al. - - Deposition of Trini Brassard, Courtney Brassard, and Daniel Brassard

Warning: Unusual sender <bbrannen@brannen-loftus.com>

You don't usually receive emails from this address. Make sure you trust this sender before taking any actions.

Ah, where to start here ...

First, let me say sorry, Rich, to hear you're under the weather (it's definitely been a one-of-a-kind cold & flu season this year).

Second, we absolutely will not accept your "offer" to proceed with Trini's continued deposition tomorrow subject to the condition that you will "reserve the right to suspend [the] deposition and reconvene" once you are satisfied that you have received the additional documents you are seeking. Let's be clear ... you "requested" the documents in a letter you emailed to me last Thursday afternoon, at 3:58 PM, demanding that they be produced by not later than Friday. The original offer to produce those documents, subject to a confidentiality order, was extended to you on September 18, 2024. We heard *nothing* in response to that offer until last week, when you unilaterally modified it to extend the offer to all parties then made a last-minute demand to produce the documents to you immediately. Our client never agreed (and does not now agree) to produce documents reflecting her (and her husband's) private financial information to any other persons. Moreover, the revised, proposed confidentiality agreement and order you circulated hasn't even been agreed to by any other parties (to my knowledge) and, more important, hasn't been signed by you *or* by the Court.

At this point, you should regard the offer to produce the documents subject to the confidentiality order we sent you six months ago to be withdrawn. We are, however, willing to discuss the terms of a revised confidentiality

order but will not produce anything until the order has been properly executed by all parties to be bound by it and approved and entered by the Court.

Finally, with regard to rescheduling depositions (and the dates mentioned in Todd's email, below), Trini and I can be available next Thursday and Friday, March 20 & 21. Please let me know ASAP if you want to move forward on either of those days, so Trini and I can block the time on our schedules.

Barney

B&L

Barney L. Brannen

Brannen & Loftus, PLLC

80 SOUTH MAIN STREET, HANOVER, NEW HAMPSHIRE 03755

e: bbrannen@brannen-loftus.com | t: 603-277-2971 ext. 102 | f: 603-277-2974 | www.brannen-loftus.com

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From: Todd Steadman <Steadman@whiteriverlawyers.com>

Sent: Monday, March 10, 2025 9:45 AM

To: Elizabeth Willhite <ewillhite@primmer.com>; Barney Brannen <bbrannen@brannen-loftus.com>; Joseph D. Tremblay <jtremblay@brannen-loftus.com>; Daniel Brassard (<brassardsugarworks@gmail.com>

<brassardsugarworks@gmail.com>; firefighter82093@aol.com; Maggie Huston <mhuston@brannen-loftus.com>

Cc: Richard Windish <rwindish@primmer.com>; Maura Snell <msnell@primmer.com>; Jamie Pinkham <jpinkham@primmer.com>

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Beth there were two parts to Tuesday not being able to work for Courtney's deposition tomorrow. The first is my schedule and recovery from RSV, but Courtney also has a medical appointment she has waited months for and cannot reschedule. I hope Rich doesn't have RSV it simply put, sucks.

I am available on the afternoon of the 17th or 21st and all day on the 20th am checking in with Courtney. The fact that this can be done remotely will make such easier to schedule. Last time depositions were scheduled and your team cancelled at the last minute Courtney lost a day of client bookings.

I will get back to you on what works for Courtney, Can you give me an idea of how long you expect the deposition to last?

Thanks

Todd

From: Elizabeth Willhite <ewillhite@primmer.com>

Sent: Monday, March 10, 2025 9:33 AM

To: Barney Brannen (<bbrannen@brannen-loftus.com> <bbrannen@brannen-loftus.com>; Todd Steadman

<Steadman@whiteriverlawyers.com>; Joseph D. Tremblay <jtremblay@brannen-loftus.com>; Daniel Brassard (brassardsugarworks@gmail.com) <brassardsugarworks@gmail.com>; firefighter82093@aol.com <firefighter82093@aol.com>; Maggie Huston <mhuston@brannen-loftus.com>
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Morning,

Richard is under the weather and cannot depose anyone tomorrow. However, we are willing to proceed with the depositions.

We understand Dan Brassard has sought court intervention related to his appearance, and will assume that he is waiting to appear until after the court's ruling. If that is not the plan, please let us know.

We spoke with Todd last week and he requested that we reschedule his client's' deposition because he is also under the weather. We are happy to reschedule, but asked for a date certain from his client and him. We did not hear back. Therefore, Courtney Brassard's deposition will begin at 1 pm tomorrow; unless we are able to reach an alternative agreement before that time.

Finally, we requested the remaining production documents from Trini Brassard, and have not received these. Similarly, we have not received any response back to the Confidentiality Agreement which your clients requested. If we do not have these issues resolved by tomorrow, we are notifying the parties that we will reserve the right to suspend Trini Brassard's deposition and reconvene once those materials are received.

Regardless, we believe we can be productive tomorrow, even if we are unable to finish Trini Brassard's deposition. Therefore, this email is notifying everyone that day two of Trini Brassard will begin at 10 am. If she objects to switching the examining attorney, please write back with that information.

I'm happy to discuss any of the above.

Best regards,
Beth

Elizabeth A. Willhite | Attorney at Law

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Main: 802 864 0880 | Fax: 802 864 0328
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ewillhite@primmer.com | www.primmer.com



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