

EXHIBIT D

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

FOURTH AMENDED NOTICE OF DEPOSITION DUCES TECUM

Pursuant to V.R.C.P. 30, you are hereby notified that JOHN DURKEE, EXECUTOR OF THE ESTATE OF DECEDENT KENNETH BLAISDELL, JR. by and through their attorneys, Primmer Piper Eggleston and Cramer PC, will take the deposition upon oral examination of **Dan Brassard** on **Tuesday, March 11, 2025** beginning at **3 p.m. EST** at 43 Lincoln Corners Way, Suite 205, Woodstock, VT, 05091 before an officer authorized to administer oaths. Said deposition may be video-recorded and will continue pursuant to rule and agreement until completed. You are invited to attend and examine.

DUCES TECUM

Mr. Brassard is hereby instructed to produce by **Tuesday, March 4, 2025** at 5:00 p.m. to Primmer Piper Eggleston and Cramer, PC, via either physical production (to Primmer Piper Eggleston and Cramer PC, 43 Lincoln Corners Way, Suite 205, Woodstock, Vermont, 05091) or electronic means (to ewillhite@primmer.com, and rwindish@primmer.com) for copying and examination under oath:

1. Any personal banking records from July 2013 – April 2021 where funds from Kenneth Blaisdell, Jr. or the Estate of Kenneth H. Blaisdell, Jr. were deposited.
2. Checks deposited into your personal banking accounts for hay sales during 2013 – 2021.
3. Any communications (emails, text, Facebook Messenger, letters, or other written documentation) between you and any hay customer of Kenneth H. Blaisdell, Jr. during 2013 – 2021.
4. Any other document or photo in your possession which relates to your claimed inheritance from the Estate of Kenneth H. Blaisdell, Jr.

DATED at Woodstock, Vermont, this 27th day of February, 2025.

PRIMMER PIPER EGGLESTON & CRAMER PC

By: /s/ Elizabeth Willhite
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***Attorneys for John Durkee, Executor of the Estate
of Kenneth H. Blaisdell, Jr.***