

EXHIBIT E



Dan Brassard <brassardsugarworks@gmail.com>

RE: Blaisdell v Brassard - Request to Postpone Depositions

Elizabeth Willhite <ewillhite@primmer.com>

Tue, Jan 14, 2025 at 11:32 AM

To: Barney Brannen <bbrannen@brannen-loftus.com>, Todd Steadman <Steadman@whiteriverlawyers.com>, "Joseph D. Tremblay" <jtremblay@brannen-loftus.com>

Cc: Richard Windish <rwindish@primmer.com>, Maura Snell <msnell@primmer.com>, "brassardsugarworks@gmail.com" <brassardsugarworks@gmail.com>

Barney,

Yes, we need to postpone everyone's deposition.

March 11 is a good idea, but we will need to amend the discovery schedule. I have attached a proposed draft.

Everyone,

Does March 11 work for everyone else? We believe we can get this done in one day with Barney's client and Todd's client on the same day. We are not inclined to reschedule Dan Brassard's deposition at this time, meaning we are no longer interested in taking Dan's deposition.

Please let us know if you assent to this filing (see attached) and we will file the same with the necessary motion.

Todd,

We are waiting for Courtney's discovery responses, our client is entitled to signed responses from your client per Rule 26. We understand schedules are busy, but we need to inform you that we have a motion to compel drafted ready to file if we do not have her signed responses in our office by January 31. Please confirm this will work for your client.

Dan,

We are waiting for your discovery responses, our client is entitled to signed responses from you per Rule 26. We have received email communications from you related to discovery, but that does not comply with Rule 26.

With respect to your discovery requests, made a few months ago, we are in the process of responding in writing per Rule 26. You may expect responses from our client by the end of this month.

Best regards,

Beth

Elizabeth A. Willhite | Attorney at Law

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

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

Sent: Tuesday, January 14, 2025 11:04 AM

To: Todd Steadman <Steadman@whiteriverlawyers.com>; Elizabeth Willhite <ewillhite@primmer.com>; Joseph D. Tremblay <jtremblay@brannen-loftus.com>

Cc: Richard Windish <rwindish@primmer.com>; Maura Snell <msnell@primmer.com>; 'brassardsugarworks@gmail.com' <brassardsugarworks@gmail.com>

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