

EXHIBIT E

Elizabeth Willhite

From: Elizabeth Willhite <ewillhite@primmer.com>
Sent: Wednesday, April 3, 2024 8:07 PM
To: Barney Brannen; Todd Steadman
Cc: Richard Windish; Maura Snell
Subject: RE: Estate of Blaisdell v Brassard et al. (Request for Discovery Conference)

Evening Gentlemen,

In order to streamline this particular discussion, the Estate has decided to produce all relevant documents it has in its possession. The production will be made by the end of this month. The production does not include the following documents, which have been requested through formal discovery requests propounded last year:

- Bank Statements of Trini Brassard, Courtney Brassard, and Dan Brassard (2013 – 2021)
- Banking Deposit Tickets for accounts held by Trini Brassard, Courtney Brassard and Dan Brassard (2013 – 2021)
- Tax Returns for any Defendant (2014 – 2022)
- Credit card statements for accounts held by Trini Brassard (2013 – 2021)
- Receipts, Checks, Third-Party Invoices for repairs Defendants made to property owned by the Estate (2013 – 2021)
- Educational information from Courtney Brassard, showing enrollment in college in Florida
- Gravel pit records for property held by Courtney Brassard
- Barter transactions for property held by Courtney Brassard

This is not an exhaustive list, but is an overview of the type of documents the Estate requested, and does not have.

On a separate note, we would like to schedule the deposition of Trini Brassard and Courtney Brassard. We are not available until the end of June or July, and as everyone's schedules are busy we suggest that dates be proposed now. Please confer with your clients and obtain a few suggested dates for each deposition.

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

From: Barney Brannen <bbrannen@brannen-loftus.com>
Sent: Tuesday, March 26, 2024 12:02 PM

To: Todd Steadman <Steadman@whiteriverlawyers.com>; Elizabeth Willhite <ewillhite@primmer.com>

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

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I don't know that we need to make this a "3-way conference" (though I do want to have an opportunity to speak with Todd first about what's been produced and what we're each working on production). I'm not available on Tuesday morning, 4/2, but my schedule on 4/3 and 4/4 is more flexible, so one of the windows you proposed in your email, Beth, will work for me. – Barney

B&L

Barney L. Brannen

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From: Todd Steadman <Steadman@whiteriverlawyers.com>

Sent: Monday, March 25, 2024 6:40 PM

To: 'Elizabeth Willhite' <ewillhite@primmer.com>; Barney Brannen <bbrannen@brannen-loftus.com>

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

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I am in a full day trial on the 4th which limits my time the two days prior but I could make something work.

I am working on finalizing the discovery responses. The majority of the requests to produce includes documents that you already have as well.

Todd

Todd C. Steadman, Esq.

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From: Elizabeth Willhite <ewillhite@primmer.com>

Sent: Monday, March 25, 2024 12:38 PM

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

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

Subject: Estate of Blaisdell v Brassard et al. (Request for Discovery Conference)

Afternoon Todd and Barney,

We are requesting a discovery conference per Rule 26, to discuss discovery requests made by our client to your clients. As you are aware, no responses have been received, and we would like to confer to avoid the necessity to compel these responses.

We are available during these days/times:

Tuesday 4/2 – between 9:00 – 11:00.

Wednesday 4/3 – between 11:00 – 1:00 and 3:30 – 5:00

Thursday 4/4 – between 9:00 – 2:00 and 4:00 – 5:00

Please let us know what date/time works for you so that we may set-up a video conference call.

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.

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