

Primmer Piper Eggleston & Cramer PC

P. O. Box 1489

Burlington, VT 05402

802-864-0880

Tax I.D.

Billed Through 06/30/2023

Bill Number - 266232 RJW

John Durkee
Administrator, Estate of Kenneth Blaisdell
P.O. Box 81
Turnbridge, VT 05077

July 21, 2023

Confidential Attorney-Client Privileged

Estate of Kenneth Blaisdell - Estate of Kenneth Blaisdell v Trini Brassard

FOR PROFESSIONAL SERVICES RENDERED

06/01/2023	EAW	Phone call with B.Brannen about Option Beneficiaries and License to Sell.	0.60 hrs	247.50 /hr	148.50
06/04/2023	EAW	Prepare Purchase and Sale Agreement for Executor to sign to sell sugarhouse parcel to D.Brassard.	0.70 hrs	247.50 /hr	173.25
06/04/2023	EAW	Draft Revised Motion for License to sell Real Estate	1.10 hrs	247.50 /hr	272.25
06/05/2023	EAW	Phone call with Executor to	0.60 hrs	247.50 /hr	148.50
06/05/2023	EAW	Forward updated P&S to Dan Brassard and Brittany Greene Brassard for their purchase of the sugarhouse parcel.	0.40 hrs	247.50 /hr	99.00
06/05/2023	EAW	Edit memorandum in support of revised motion for license to sell real estate, Forward to all beneficiaries with request for consents.	0.60 hrs	247.50 /hr	148.50
06/07/2023	EAW	Review filing from Troy Blaisdell about request for specific property.	0.70 hrs	247.50 /hr	173.25
06/08/2023	EAW	Phone conference with B.Brannen and T.Steadman.	1.10 hrs	247.50 /hr	272.25
06/08/2023	RJW	Attend pre-mediation conference with opposing counsel	0.50 hrs	337.50 /hr	168.75
06/12/2023	EAW	Review status of equipment sales online at auction house, Compare current bids with current Option Beneficiary offers, Prepare and Send Email to Option Beneficiary counsel requesting a change in the stipulation to remove reserve on certain items.	1.10 hrs	247.50 /hr	272.25

Exhibit 4

**Trini Brassard's Memo in Opposition
to Motion to Compel**

JD000011

06/12/2023	EAW	Meeting with Executor Durkee and R.Windish	1.50 hrs	247.50 /hr	371.25
06/12/2023	EAW	Prepare and send emails to Option Beneficiaries about equipment sales and status of auction to date.	0.60 hrs	247.50 /hr	148.50
06/12/2023	EAW	Prepare and send emails to all Parties about motion for license to sell.	0.70 hrs	247.50 /hr	173.25
06/12/2023	EAW	Review email from Dan Brassard about Purchase & Sale Agreement and escrow deposit.	0.40 hrs	247.50 /hr	99.00
06/12/2023	RJW	Meeting with client	2.50 hrs	337.50 /hr	843.75
06/13/2023	EAW	Phone call with Executor	0.30 hrs	247.50 /hr	74.25
06/13/2023	EAW	Phone call to B.Brannen about auction, Review email from B.Brannen about auction.	0.80 hrs	247.50 /hr	198.00
06/13/2023	EAW	Review email from Austin Gray about auction and property sales.	0.60 hrs	247.50 /hr	148.50
06/14/2023	EAW	Phone call with Executor Durkee to discuss , Email T.Hirschak confirming reserve changes for equipment public auction, Email T.Blaisdell and A.Gray requesting phone conference today.	0.70 hrs	247.50 /hr	173.25
06/14/2023	EAW	Prepare and send email to mediator, Greg Eaton, to summarize status of mediation settlement items (supplemental confidential mediation summary statement) before mediation session today.	0.70 hrs	247.50 /hr	173.25
06/14/2023	EAW	Phone call to Austin Gray to discuss equipment sales, Phone call with Thad Blaisdell to discuss equipment sales.	0.70 hrs	247.50 /hr	173.25
06/14/2023	EAW	Attend Mediation with Trini Brassard, Courtney Brassard, and Dan Brassard.	10.70 hrs	247.50 /hr	2,648.25
06/14/2023	RJW	Travel to and from Hanover and attend mediation	9.00 hrs	337.50 /hr	3,037.50
06/16/2023	EAW	Review emails from various beneficiaries, Respond to emails about mediation, Respond to emails about criminal investigation, Respond to emails about property sales.	2.10 hrs	247.50 /hr	519.75

06/16/2023	EAW	Observe final hour of equipment auction, Finalize equipment sale spreadsheet, Discuss final sale details with auction house and Executor.	1.10 hrs	247.50 /hr	272.25
06/16/2023	RJW	Telephone call with John Durkee regarding	0.30 hrs	337.50 /hr	101.25
06/20/2023	RJW	Telephone call with Barney Brannen regarding Vermont State Police investigation	0.10 hrs	337.50 /hr	33.75
06/21/2023	EAW	Review various emails about mediation, Respond to final offer email, Phone call about final offer mediation position and next steps.	1.20 hrs	247.50 /hr	297.00
06/21/2023	RJW	Telephone calls with Greg Eaton and Barney Brannen regarding status of case and settlement; emails from Barney Brannen and Greg Eaton regarding same	0.80 hrs	337.50 /hr	270.00
06/23/2023	EAW	Review email from B.Brannen with list of various points related to mediation, civil action, legal bills, property sales, equipment sales, and requested next steps from T.Brassard.	1.10 hrs	247.50 /hr	272.25
06/26/2023	EAW	Phone call with Executor to discuss	0.80 hrs	247.50 /hr	198.00
06/28/2023	EAW	Phone call to B.Brannen about motion for license to sell and final mediation offer from Estate, Prepare revised motion for license to sell, Email mediation team for T.Brassard's claims about deadline to respond.	1.00 hrs	247.50 /hr	247.50
06/28/2023	EAW	Phone call with Mediator Eaton, Prepare calculations for T.Brassard's claim payment, Prepare email to T.Steadman for C.Brassard payment, Email D.Brassard about claims and payment.	2.80 hrs	247.50 /hr	693.00
06/28/2023	EAW	Review settlement calculations, estate asset liquidation valuation, and update final distribution spreadsheet.	1.30 hrs	247.50 /hr	321.75
06/28/2023	LEB	Review revised Motion to Sell RE; update Memo of Law; prepare exhibits for Motion; draft COS.	0.50 hrs	144.00 /hr	72.00
06/28/2023	RJW	Numerous emails to and from opposing counsel regarding further settlement discussions	0.30 hrs	337.50 /hr	101.25
06/29/2023	EAW	Review emails from Mediator Eaton and Attorney Steadman about settlement, Respond to emails from both and discuss Estate's claims with internal team, Forward email to Executor	1.70 hrs	247.50 /hr	420.75

06/29/2023	EAW	Phone call with Mediator Eaton and B.Brannen, Prepare spreadsheet outlining estimated figures for T.Brassard settlement.	2.20 hrs	247.50 /hr	544.50
06/29/2023	EAW	Review status of gravel operations at Estate property.	0.90 hrs	247.50 /hr	222.75
06/29/2023	EAW	Edit Complaint to initiate civil action against certain beneficiaries.	4.40 hrs	247.50 /hr	1,089.00
06/29/2023	RJW	Several emails to and from opposing counsel regarding status of settlement	0.30 hrs	337.50 /hr	101.25
06/30/2023	EAW	Draft Motion for Writ of Attachment	0.80 hrs	247.50 /hr	198.00
06/30/2023	EAW	Review emails from B.Brannen and T.Steadman, Forward requested data to these attorneys for final review with their client pre-suit.	1.30 hrs	247.50 /hr	321.75
06/30/2023	EAW	Draft affidavit for Motion for Writ of Attachment	3.70 hrs	247.50 /hr	915.75
06/30/2023	EAW	Finalize Motion for Writ of Attachment.	6.50 hrs	247.50 /hr	1,608.75
06/30/2023	LEB	Prepare exhibits and summonses, research registered agents for Brassard Sugarworks and Brassard Construction	1.20 hrs	144.00 /hr	172.80
06/30/2023	RJW	Edits and revisions to complaint and motion for writ of attachment; emails from opposing counsel regarding settlement	3.30 hrs	337.50 /hr	1,113.75
Total fees for this matter					<u>\$20,247.30</u>

DISBURSEMENTS

06/19/2023	Hess & Gehris, PLLC - Mediation services	\$2,100.00
	Total disbursements for this matter	<u>\$2,100.00</u>

BILLING SUMMARY

PTNR	Windish, Richard J	17.10 hrs	\$337.50 /hr	\$5,771.25
ASSOC	Willhite, Elizabeth A.	57.50 hrs	\$247.50 /hr	\$14,231.25
PARA	Browne, Leslie E	1.70 hrs	\$144.00 /hr	\$244.80

TOTAL FEES	\$20,247.30
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TOTAL DISBURSEMENTS	\$2,100.00
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TOTAL CHARGES DUE THIS BILL	\$22,347.30
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TRUST FUNDS REMAINING	\$10,000.00
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To pay by credit card, please email the finance department at
banking@primmer.com to receive a secure link or call (802) 657-7676.