

EXHIBIT

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July 11, 2025

(VIA EMAIL)

brassardsugarworks@gmail.com

Dan Brassard

**Re: *John Durkee, Executor of Estate of Kenneth H. Blaisdell, Jr.*
 v. Trini Brassard, et al.
 Docket No.: 23-CV-02848**

Dear Dan,

This letter is being sent pursuant to the V.R.C.P. 26, 33, 34, and 37 as a supplement to our Requests to Produce and Interrogatories dated September 29, 2023. As required by V.R.C.P. 26(c)(1), this letter is being sent in good faith and is our effort to resolve the dispute outlined below. If there is a need to conference, we will participate.

Discovery Obligations under V.R.C.P. 26, 33, 34, 37.

Plaintiff may use interrogatories (Rule 33) and request to produce (Rule 34) to obtain discovery that is “relevant to his claims” and “proportional to the needs of the case.” V.R.C.P. 26(b). See Rule 26(b)(1)

In addition, because the Court addressed your confidentiality concerns and issued an order governing the production of financial documents on April 30, 2025, any objection from you based on confidentiality is now moot.

Missing Discovery

Bank Statements and Deposit Tickets for Brassard Sugarworks and Maple Supply LLC.

To date, you have not provided any bank statements or deposit information of any kind relating to Brassard Sugarworks and Maple Supply LLC. As explained in the Court’s Confidentiality Order, Plaintiff is entitled to these documents and information. Please produce these records promptly.

Unredacted Copies of Deposited Checks

On June 9, 2025, pursuant to the Court April 30, 2025 order (the “Confidentiality Order”), you provided copies of financial records. However, there are multiple deposited checks where the account owner is redacted, and memo line is redacted or unreadable. These records

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are labeled: DB00041; DB00054-55; DB00068-70; DB00078; DB00081-82; DB00091; DB00102-103; DB00111; DB00122-123; DB00132; DB00144; DB00155; DB00164-165; DB00186; DB00188; DB00196; DB00198-199; DB00212; DB00214; DB00233-235; DB00239; DB00255-56; DB00258; DB00267; DB00269; DB00284; DB00299-DB00300; DB00313; DB00322; DB00342-344; DB00357; DB00366; DB00373; DB00396-397; DB00416; DB00452-453; DB00469; DB00487-88; DB00491-495; DB00508; DB00518-519; DB00561; DB00627-629; DB00647; DB00668; DB00669; DB00670; DB00672; DB00691-694; DB00708-713; DB00730-733; DB00796; DB00798.

Your production of these redacted and unreadable statements fails to comply with Rule 33 as the answers to Plaintiff's Interrogatories may not be derived or ascertained from the redacted records. Plaintiff is unable to determine what each payment was for, for whom, and its relationship to a contract, invoice, or otherwise.

The information sought is responsive to Plaintiff's discovery request and is relevant to Plaintiff's claims. Thus, it must be provided. Further, your objection based on concerns that we would contact clients and allegedly damage your reputation fails as these concerns would be covered under the court's Confidentiality Order.

Please produce all the requested information within the next ten business days. Alternatively, we will request the court intervene to decide this issue.

Sincerely,

/s/ Elizabeth Willhite

Elizabeth Willhite