

EXHIBIT B

Maura Snell

From: Dan Brassard <brassardsugarworks@gmail.com>
Sent: Monday, July 21, 2025 4:35 PM
To: Elizabeth Willhite
Cc: Barney Brannen; Todd Steadman (Steadman@whiteriverlawyers.com); Joseph D. Tremblay; Brian Falzo; Maggie Huston; Richard Windish; Angéline Debeaupuis; Maura Snell
Subject: Re: Rule 26(h) Conference
Attachments: image001.jpg

Warning: Unusual link

This message contains an unusual link, which may lead to a malicious site. Confirm the message is safe before clicking any links.

I'm not surprised... once again you're wrong I had the documents after I produced them I destroyed them.

Here's your options

1. A 5 gallon bucket of ashes and you can piece them back together.

2. Once I have them I'll produce them.

Which one will it be?

On Mon, Jul 21, 2025, 4:12 PM Elizabeth Willhite <ewillhite@primmer.com> wrote:

Dear Mr. Brassard,

We do not understand that process. You have the documents. You redacted them and sent them to us, we want the same documents without redactions. We do not believe it is necessary to wait for the bank to produce them “at their convenience”

Best regards,

Beth

Elizabeth A. Willhite | Attorney at Law

PRIMMER PIPER EGGLESTON & CRAMER PC

[43 Lincoln Corners Way, Suite 205 | Woodstock, VT 05091](#)

Main: 802 864 0880 | Fax: 802 864 0328

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ewillhite@primmer.com | www.primmer.com



please copy my legal assistant Maura Snell (msnell@primmer.com) on all communications

From: Dan Brassard <brassardsugarworks@gmail.com>

Sent: Monday, July 21, 2025 3:55 PM

To: Elizabeth Willhite <ewillhite@primmer.com>

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

<Steadman@whiteriverlawyers.com>; Joseph D. Tremblay <jtremblay@brannen-loftus.com>; Brian Falzo

<firefighter82093@aol.com>; Maggie Huston <mhuston@brannen-loftus.com>; Richard Windish

<rwindish@primmer.com>; Angéline Debeaupuis <adebeaupuis@primmer.com>; Maura Snell <msnell@primmer.com>

Subject: Re: Rule 26(h) Conference

External sender <brassardsugarworks@gmail.com>

Make sure you trust this sender before taking any actions.

I've been in contact with the bank that held that account and they're supposed to be preparing the deposits at their convenience.

On Mon, Jul 21, 2025, 10:58 AM Elizabeth Willhite <ewillhite@primmer.com> wrote:

Dear Mr. Brassard,

We continue to wait for un-redacted versions of specific pages from your document production. We have been attempting to reach an agreement with you on this issue for over 40 days. We received your document production on June 11, 2025. We sent an email to you that same day, which confirmed we were fine with redactions on account numbers, but not on the memo line or account holder

sections. We asked you to produce (semi) un-redacted versions within 15 days. You responded 20 days later on July 1. In your email response, you offer to provide us with your explanation of these payments, but refuse to provide (semi) un-redacted versions, claiming your right to withhold this information based on your belief that “we will contact the people using the same tone and hostile approach that you have used with me from day 1.” Two days after that, you respond to a different email asking, “what outstanding discovery do I owe the Estate?” The issue was not resolved, but your July 3 email seemed to imply you thought it was resolved. Therefore, we sent you a formal Rule 26(h) letter on July 11. In this letter, which is attached, we explain our position and provide you with the Bates label references for the production documents we are claiming must be produced in (semi) un-redacted form.

We have given you more than ample time to correct this issue and are not inclined to offer any additional extensions. This is our final attempt to reach an agreement and confer with you on this matter. We will file a motion to compel seeking these documents, plus fees and expenses if necessary. Your failure to produce these documents may also impact the parties' ability to mediate these claims on the date selected.

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

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