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April 12, 2024

(VIA EMAIL)

Daniel Brassard (brassardsugarworks@gmail.com)
Barney Brannen (bbrannen@brannen-loftus.com)
Todd Steadman (steadman@whiteriverlawyers.com)

Re: Estate of Kenneth H. Blaisdell, Jr.
23-CV-02848

Dear Mr. Brassard, Barney and Todd,

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. 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.

Outstanding Discovery Issues

Plaintiff's First Set of Interrogatories and Requests to Produce.

As you are aware, our client has not received any responses to these pending discovery requests, which were made over six months ago. When asked for these responses, the response received has been that your clients' believe these discovery requests are seeking information which is already in our client's possession.

In order to clarify what is in our client's possession, we chose to provide an initial disclosure of documents, which you received today. However, we are confident that it was always clear that our client could not have in its possession the banking and transactional records for accounts owned by you and your clients.

Since we have now produced any relevant document, we now re-state our request that your clients' respond to these discovery requests.

Interrogatories 1-7: These requests seek information regarding you and your clients' general demographics, general information about personal finances, specific information about financial

remuneration received by you or your clients from the Estate (in any form). Our client is entitled to this information under Rule 26, as such, please provide complete formal responses.

Interrogatories 8-14: These requests seek information regarding you or your clients' receipt of gifts (in any form), the purchase of a Eustis Cable truck, income from farm crops, and various other financial support received by you or your clients during the relevant time period. Our client does not have complete information about these transactions, and is entitled to this information under Rule 26, as such, please provide complete formal responses.

Interrogatories 15-25: These requests seek information regarding you or your client's knowledge of the Decedent's medical condition following his stroke, as well as your job duties during the relevant time period. Our client does not have this information. Our client is entitled to this information under Rule 26, as such, please provide complete formal responses.

Request to Produce 2: This request seeks information about you or your clients' financial accounts. This discovery request is to uncover additional information about these transactions, which our client is entitled to under Rule 26, as such, please provide complete formal response.

Request to Produce 3: This request seeks information about real estate transactions (communications, records, appraisals, payments, etc...). Our client has real estate records held in local land records, and transactional information from the Decedent's checking and savings accounts. Those documents are included in the initial disclosure production made today. However, this request seeks all relevant real estate transactions in you or your clients' possession. Our client is entitled to this information, under Rule 26, as such, please provide complete formal response.

Request to Produce 4 & 5: These requests seek documents related to purchases of automobiles, mobile homes, motor homes, and other personal property during the relevant time period. Our client is entitled to this information, under Rule 26, as such, please provide complete formal responses.

Request to Produce 6: This request seeks documents related to leases made by you or your clients during the relevant time period on properties owned by the Decedent. Our client had copies of leases, and has produced today what is in our files. However, this request seeks all documents related to the same (emails, communications, reports, receipts, drafts, etc..). Our client is entitled to this information, under Rule 26, as such, please provide complete formal response.

Request to Produce 7: This request seeks documents related to tax returns filed by you or your clients during the relevant time period. Our client does not have these documents. Our client is entitled to this information, under Rule 26, as such please provide complete formal response.

Request to Produce 8: This request seeks documents related to personal financial accounts held by you or your clients during the relevant time period. Our client does not have these

documents. Our client is entitled to this information, under Rule 26, as such please provide complete formal response.

Request to Produce 9: This request seeks documents related to Vermont Department of Motor Vehicles records linked to you or your clients' personal records. Our client does not have these documents. Our client is entitled to this information under Rule 26, as such please provide complete formal response.

Discovery Requests Specific to Courtney Brassard

Request to Produce 10 (Courtney Brassard): This request seeks records related to communications between Courtney Brassard and W.B. Rogers Gravel. Our client does not have these records, and our client is entitled to this information under Rule 26, as such, please provide a complete formal response.

Request to Produce 11 (Courtney Brassard): This request seeks records related to communications between Courtney Brassard and Trini Brassard related to caregiving for the Decedent. Our client does not have these records, and our client is entitled to this information under Rule 26, as such please provide a complete formal response

Request to Produce 12 (Courtney Brassard): This request seeks records related to communications between Courtney Brassard and anyone about the transfer of land from the Decedent to Courtney Brassard and Brian Falzo. Our client does not have these records, and our client is entitled to this information under Rule 26, as such please provide a complete formal response.

Discovery Requests Specific to Daniel Brassard

Request to Produce 10 (Daniel Brassard): This request seeks records related to self-employment activities between July 2013 – April 2021. Our client does not have these records, and our client is entitled to this information under Rule 26, as such please provide complete formal response.

Request to Produce 11 (Daniel Brassard): This request seeks records related to farm leases for the relevant time period which you managed, controlled, were a party to, or have in your possession. Our client does not have these records, and our client is entitled to this information under Rule 26, as such please provide complete formal response.

Request to Produce 12 (Daniel Brassard): This request seeks records related to livestock auction sales between July 20213 – April 2021 that are in your possession. Our client does not have these records, and our client is entitled to this information under Rule 26, as such please provide complete formal response.

We appreciate the need for clarity on what has already been received by our client, however we have cured that misperception through our document production. Therefore, our client is confident these discovery requests are necessary, relevant, and permitted under the

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Rules. We must insist that you or your clients provide responses in the next 30 days. If responses are not received, we may seek a court intervention.

Sincerely,

/s/ Richard Windish

Richard Windish, Esq.