

Elizabeth Willhite

From: Elizabeth Willhite
Sent: Friday, May 10, 2024 5:56 AM
To: Barney Brannen (bbrannen@brannen-loftus.com); Todd Steadman (Steadman@whiteriverlawyers.com)
Cc: Richard Windish; Maura Snell
Subject: Estate of Blaisdell v Trini Brassard - Proposed Amended ADR Schedule
Attachments: 2024_05_09 Proposed Amended ADR Stipulation(6534425.1).pdf
Importance: High

Morning Barney and Todd,

Attached is a proposed amended ADR Stipulation, which we are sending to you for your assent. We will attach electronic signatures and file with the necessary motion once assents are provided.

Obviously, this is necessary due to delays in receiving discovery responses from your clients. In addition to your collective assent, please let us know if responses are forthcoming. If they are not, please let us know if we need a conference to discuss the continued delay. We are not pushing this issue for a multitude of reasons namely (1) settlement talks; (2) desire to limit costs; and (3) professional courtesy. However, we cannot continue to delay the impending motion to compel if responses will be further delayed.

Rich and I are heading into a week of trial prep and then a jury trial in the Kingdom, the trial begins 5/20 and ends 6/3. During that time we will not be available to conference on discovery issues, and we would like to file this proposed amended discovery schedule before our trial if possible.

Finally, we would like to schedule depositions of your clients for August. Our administrative assistant, Maura Snell, will coordinate scheduling. We would like to be as efficient as possible, and believe we will be able to depose Courtney and Dan on the same day. These are the dates we suggest either Aug 8 or Aug 9 in our Woodstock office. We request both deponents appear in person. Assuming Courtney and Dan are available on August 8, we would like to depose Trini Brassard on Aug 9 also in person at our Woodstock office. We will issue notice of depositions once your offices confirm your availability.

Thank you,
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
Direct: 802 371 5202 | Cell: 802 369 0211
ewillhite@primmer.com | www.primmer.com



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