

STATE OF VERMONT

VERMONT SUPERIOR COURT
Orange Unit

CIVIL DIVISION
Docket No. 23-CV-02848

JOHN DURKEE, EXECUTOR OF THE)
ESTATE OF DECEDENT)
KENNETH H. BLAISDELL, JR.)

v.)

TRINI BRASSARD,)
COURTNEY BRASSARD, BRIAN FALZO,)
DANIEL BRASSARD, AND)
BRASSARD SUGARWORKS)
AND MAPLE SUPPLY, LLC)

NOTICE OF DEPOSITION DUCES TECUM

Pursuant to V.R.C.P. 30, you are hereby notified that JOHN DURKEE, EXECUTOR OF THE ESTATE OF DECEDENT KENNETH BLAISDELL. JR. by and through their attorneys, Primmer Piper Eggleston and Cramer PC, will take the deposition upon oral examination of **Trini Brassard** on **Friday August 9, 2024** beginning at **10:00 a.m. EST** at 43 Lincoln Corners Way, Suite 205, Woodstock, Vermont 05091 before an officer authorized to administer oaths. Said deposition may be video-recorded and will continue pursuant to rule and agreement until completed. You are invited to attend and examine.

DUCES TECUM

Ms. Brassard is hereby instructed to produce by **Friday, August 2, 2024** at 5:00 p.m. to Primmer Piper Eggleston and Cramer, PC, via either physical production (to Primmer Piper Eggleston and Cramer PC, 43 Lincoln Corners Way, Suite 205, Woodstock, Vermont, 05091) or electronic means (to ewillhite@primmer.com, and rwindish@primmer.com) for copying and examination under oath:

1. All personal banking records from July 2013 – April 2021 where funds from Kenneth Blaisdell, Jr. or the Estate of Kenneth H. Blaisdell, Jr. were deposited.
2. Credit card statements from July 2013 – April 2021 where funds from Kenneth Blaisdell, Jr. or the Estate of Kenneth H. Blaisdell, Jr. were used to pay these same account balances.
3. Legal bills paid by Kenneth Blaisdell, Jr. or the Estate of Kenneth H. Blaisdell, Jr. during the time period of July 2013 – April 2021.
4. Customer lists for hay operations on lands owned by Kenneth Blaisdell, Jr. between July 2013 – April 2021.
5. Medical records for Kenneth Blaisdell, Jr. in your possession, custody, or control.
6. Any document related to equipment sales, equipment purchases, equipment trades, or barter transactions for equipment owned by Kenneth Blaisdell, Jr. during the time period of July 2013 – April 2021.
7. Any communication between yourself and Eustis Cable between July 2013 – April 2021.
8. Any communication between yourself and W.B. Rogers between July 2013 – present.
9. A copy of your current resume.
10. Any communications (emails, text messages, Facebook Messenger, letters, or other written documents) between yourself and either Courtney Brassard, Dan Brassard, or Troy Blaisdell relating to Kenneth Blaisdell, Jr.'s farm operations, medical condition, care needs, and or financial data between July 2013 – April 2021.
11. Any communications (emails, text messages, Facebook Messenger, letters, or other written documents) between yourself and either Courtney Brassard, Dan Brassard, Nick

Blaisdell, or Troy Blaisdell relating to the Estate of Kenneth H. Blaisdell, Jr. between April 2021 – present.

12. Copies of all deeds for all real property owned by you as of June 2023.
13. Copies of all current mortgages, lines of credit, security interest liens, or other encumbrances on any parcel of real property currently owned by you.
14. Any other document or photo in your possession which relates to your claimed inheritance from the Estate of Kenneth H. Blaisdell, Jr.

DATED at Woodstock, Vermont, this 7th day of June, 2024.

PRIMMER PIPER EGGLESTON & CRAMER PC

By: /s/ Elizabeth Willhite
Elizabeth A. Willhite, Esq.
Richard Windish, Esq.
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***Attorneys for John Durkee, Executor of the Estate
of Kenneth H. Blaisdell, Jr.***