

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.,
Plaintiff**

v.

**Trini Brassard, Courtney Brassard,
Brian Falzo, Daniel Brassard,
and Brassard Sugarworks
and Maple Supply, LLC,
Defendants**

OBJECTION TO MOTION FOR DISCOVERY SANCTIONS

Now comes Defendant, Courtney Brassard, by and through her attorneys Davis Steadman Percy & Sluka LLC and respectfully files this objection to Plaintiff's motion for discovery sanctions. In support thereof the following is offered:

Plaintiff asserts that Courtney Brassard did not comply with the discovery requests in that she has not provided copies of all deposited check and deposit slips from her accounts. Attached are Defendant Courtney Brassard's discovery responses. The request regarding bank accounts requests copies of monthly bank statements and copies of cancelled check, deposit slips, and wire transfer documentation. Attachment A, RTP 8. The statements provided list all deposits made to the account however such are made by Mobile Banking deposit; deposit slips are not utilized. Most importantly though RTP 8 relating to bank accounts does not request copies of deposited checks.

Plaintiff also complains about the redaction of documents provided though discovery however this motion is the first time that the Plaintiff has ever raised such an issue. Indeed in the July 24, 2025, letter to the undersigned there was not a single mention of redacted documents. Attachment B. Plaintiff cannot raise the redaction of documents as a cause for sanctions for the very first time in Plaintiff's motion.

Finally the required discovery conference has not taken place. Despite any assertions to the contrary, the parties scheduled a discovery conference for the 18th of August at 3:00 p.m. but it did not take place. Attachment C. In an attempt to reschedule the undersigned called Attorney Willhite's direct line of the 19th of August and left a message. Attachment D. The call was never

returned.

All parties thereafter concentrated on scheduling and preparing for mediation, which unfortunately was not successful. Plaintiff's motion followed.

Courtney Brassard has been seeking and will continue to attempt to receive such through her bank but her inability to provide additional information that was not part of the discovery request cannot be a justification for sanctions or contempt.

Plaintiff's motion should be denied. Deposit slips are not utilized and copies of deposited checks were not requested. The required discovery conference has also not taken place.

Wherefore it is respectfully requested that the Plaintiff's motion be denied.

Dated at White River Junction, Vermont this 14th day of October 2025.

COURTNEY BRASSARD

/s/ Todd C. Steadman

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