

STATE OF VERMONT

VERMONT SUPERIOR COURT
Orange Unit

CIVIL DIVISION
Docket No. 23-cv-02848

JOHN DURKEE, EXECUTOR OF THE)
ESTATE OF DECEDENT H. BLAISDELL, JR.,)
Plaintiff,)
)
v.)
)
TRINI BRASSARD, COURTNEY BRASSARD,)
BRIAN FALZO, DANIEL BRASSARD, AND)
BRASSARD SUGARWORKS AND MAPLE)
SUPPLY, LLC,)
Defendants.)

**ASSENTED TO MOTION FOR LEAVE TO
EXTEND DEADLINE TO REPLY TO
COUNTERCLAIM PLAINTIFF TRINI BRASSARD'S OPPOSITION
to
PLAINTIFF'S MOTION TO DISMISS**

NOW COMES Plaintiff John Durkee, Executor, by and through counsel, PRIMMER
PIPER EGGLESTON & CRAMER PC, and hereby MOVES this Honorable Court for an
extension of the deadline to file its reply brief to said Opposition to Motion to Dismiss. In
support of the relief requested herein, Plaintiff further hereby states as follows.

1. Plaintiff filed the pending motion to dismiss on September 20, 2023.
2. Counterclaim Plaintiff filed an opposition motion on October 2, 2023. A reply brief is due, under the Rules, 14 days later, which is October 18, 2023. V.R.C.P. 7 (b)(4).
3. Plaintiff seeks an extension of the time-frame to respond. This is due to unforeseen complications and the press of other business, which has delayed the undersigned counsel in the completion of their opposition papers.
4. Counterclaim Plaintiff's counsel has assented to the relief requested herein.

5. Rule 6(b)(1)(B) provides that “the court may, for good cause, extend the time...on motion made after the time has expired.” V.R.C.P. 6(b)(1)(B). Accordingly, Plaintiff’s reply is due of even date herewith. Plaintiff requests an extension of seven days, until October 25, 2023, and all parties have consented.

WHEREFORE, for all the foregoing reasons, Plaintiff hereby respectfully requests that this Honorable Court GRANT the relief requested herein, and further requests all such other relief as this Honorable Court deems just and appropriate under the circumstances.

DATED at Woodstock, Vermont, this 18th day of October, 2023.

PRIMMER PIPER EGGLESTON & CRAMER PC

By: /s/ Richard Windish
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***Attorneys for Defendant Lamoille County Mental
Health Services***

DATED at Woodstock, Vermont, this 11th day of August, 2023.

By: /s/ Richard Windish
Richard Windish, Esq.

/s/ Elizabeth Willhite
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***Attorneys for John Durkee, Executor of the Estate
of Kenneth H. Blaisdell, Jr.***

DATED at Hanover, New Hampshire this ____ day of August, 2023.

Barney L. Brannen, Esq.
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Attorney for Trini Brassard

DATED at White River Junction, Vermont this ____ day of August, 2023.

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Attorneys for Courtney Brassard

Date

Daniel Brassard, *Pro Se* Defendant

Brassard Sugarworks and Maple Supply, LLC
Pro Se Defendant

Date

By: _____
Authorized Signatory

Date

Brian Falzo, *Pro Se* Defendant