

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.)

PLAINTIFFS' MOTION TO AMEND ADR STIPULATION
with
ASSENTED-TO SECOND AMENDED
DISCOVERY/ALTERNATE DISPUTE RESOLUTION STIPULATION

NOW COMES Plaintiff JOHN DURKEE, EXECUTOR OF THE ESTATE OF
DECEDENT KENNETH H. BLAISDELL, JR, by and through counsel, PRIMMER PIPER
EGGLESTON & CRAMER, PC, and hereby MOVES this Court to APPROVE the Assented-To
Second Amended Discovery/Alternate Dispute Resolution Stipulation, submitted of even date
herewith, for reasons stated as follows.

Since September 3, 2024, when this court approved the first amended discovery schedule,
the parties have completed some discovery. However, the parties still need to complete some
written discovery and fact witness depositions. Plaintiff may seek expert opinions after these
discovery tasks are completed. The current deadline to propound written discovery is October 1,
2024. The current deadline to complete fact witness depositions is February 1, 2025. The
current deadline for Plaintiff to disclose expert reports is February 1, 2025.

Assuming these discovery tasks are completed in a timely manner, the parties should be
able to complete all of these tasks by the deadlines in the attached Assented-To Second

Amended Discovery/Alternate Dispute Resolution Stipulation. The parties have viewed the same document, and all parties assent to the proposed amended discovery schedule.

WHEREFORE, Plaintiff MOVES this Honorable Court to APPROVE the Assented-To Second Amended Discovery/Alternate Dispute Resolution Stipulation.

DATED at Woodstock, Vermont, this 29th day of January, 2025.

PRIMMER PIPER EGGLESTON & CRAMER PC

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