

STATE OF VERMONT

SUPERIOR COURT
Orange Unit

CIVIL DIVISION
Docket No. 23-CV-02848

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

**PLAINTIFF'S MOTION TO WITHDRAW
PLAINTIFF'S MOTION FOR SCHEDULING CONFERENCE
AND CANCEL HEARING**

NOW COMES Elizabeth Willhite, Esq., of PRIMMER PIPER EGGLESTON & CRAMER PC, counsel for Plaintiff John Durkee, Executor of the ESTATE OF KENNETH H. BLAISDELL, JR., ("Estate"), hereby WITHDRAWS the pending *Motion for Status Conference* and CANCEL the Hearing scheduled today, Monday September 16, 2024 at 9:30 am, and further support states as follows:

1. Discovery has been delayed in this Case, but the Parties recently were able to move forward.
2. As outlined in the underlying brief, the main discovery issues that led Plaintiff to request the discovery conference were as follows:
 - a. Defendants' Responses to Plaintiff's Written Interrogatories and Requests to Produce;
 - b. Scheduling of depositions for 3 Defendants; and

- c. Amending the discovery schedule.
3. The Parties were able to reach an agreement related to the discovery schedule, and an amended discovery schedule has filed with the Court August 16, 2024 and the Court approved the amended schedule on September 3, 2024.
 4. Depositions for the requested parties have been scheduled.
 5. The only remaining discovery item from Plaintiff's original list is written responses to Plaintiff's discovery requests. However, the parties have (for the most part) agreed to provide responses and documents within the next thirty day.
 6. Therefore, Plaintiff does not believe a discovery conference is necessary.
 7. The lateness of this request is in part due to the unavoidable fact that Plaintiff's counsel has been ill, and was unable to notify the court sooner.
 8. Counsel has reached all parties, who are in agreement that the scheduling conference is unnecessary.
 9. All parties were notified over the weekend of this decision.

WHEREFORE, Plaintiffs WITHDRAW the pending Motion for Scheduling Conference and REQUEST the Court CANCEL they hearing scheduled for today.

DATED at Woodstock, Vermont, this 16th day of September, 2024.

PRIMMER PIPER EGGLESTON & CRAMER PC

By: /s/ Elizabeth Willhite
Elizabeth A. Willhite, Esq.
43 Lincoln Corners Way, Suite 205
Woodstock, Vermont 05091
ewillhite@primmer.com | 802-371-5202
***Attorneys for John Durkee, Executor of the Estate
of Kenneth H. Blaisdell, Jr.***