

State of Vermont

Superior Court

Civil Division

Orange Unit

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
Brassard Sugarworks and Maple Supply LLC
Defendants

**Response to Plaintiffs Motion for Discovery Sanctions Against Defendants Daniel
Brassard and Brassard Sugarworks and Maple Supply LLC**

Response to their introduction -The court-imposed deadline was not May 30, 2025 it was within 30 days of receipt by counsel of the order. The order was mailed to me by the court and received on May 5, 2025. I assembled the documents and mailed the instructions to access the Dropbox on June 5, 2025 to the plaintiff's counsel. (Exhibit A) My understanding was that receipt of the order from the court is what started my time to submit to Plaintiff given I do not have counsel to receive the order.

On July 21, 2025 prior to plaintiffs filing for sanctions I voluntarily produced Brassard Sugarworks and Maple Supply LLC bank records, from the time the account was opened until date of death of the decedent. There are no Credit Card statements to be produced. This included monthly statements, cancelled checks and deposit slips that were provided to me by the bank. An example of these records is attached as Exhibit D.

Plaintiffs First set of interrogatories and requests to produce to Defendant Daniel Brassard has definition #7 which states "You" or "your" means defendant Daniel

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VERMONT SUPERIOR COURT

AUG -7 2025

ORANGE UNIT

Brassard and his respective attorneys, agents and any other person acting on his behalf or at his instruction." In Interrogatories second item #2 "Identify all banking or other financial institutions where **You** have held personal or business accounts from July 18, 2013 to the present." Later under request for production item #8 "With respect to all banks and other financial institutions at which **You** have held an account from July 18, 2013 to date, produce a copy of **Your** monthly bank statements and copies of cancelled checks, deposit slips, and wire transfer confirmations". This document does not request any information from Brassard Sugarworks and Maple Supply LLC. (Exhibit B) Personal bank account information was provided.

On some documents there were redactions that I felt were appropriate to prevent the plaintiff and his counsel from contacting my customers and using the same approach they've tried using with me. When Plaintiff's counsel questioned these, I offered an alternative way to try and protect my business that they refused.

In response to the July 11, 2025 letter (Exhibit C) from the Plaintiff and as confirmed in Affidavit of Elizabeth Wilhite, item 10, dated July 23, 2025" (Exhibit G), the listing of bates numbered documents from my personal account that were requested, were provided on July 24, 2025.

These unredacted versions of the bates numbered documents requested and provided, were made available only after I received a new copy from the bank. These were requested and I was advised the Bank would reach out when they got to my request with any questions. See communication with the bank showing dates the bank was working to assemble. (Exhibit E) The bates number did change on the unredacted version so they would not be confused with the originals. The redacted versions were accidentally burned when my kids started a campfire. They grabbed the wrong bag, confusing it with the one that contained other paper items for starting a campfire.

At this time, I believe I have fulfilled their discovery requests.

In response to "Supplemental Affidavit of Elizabeth Wilhite in support of Plaintiffs Motion for Sanctions" (Exhibit H) I offer the following;

5-a – I produced all requested checks from the July 11, 2025 letter (Exhibit C) in unredacted form on July 24, 2025.

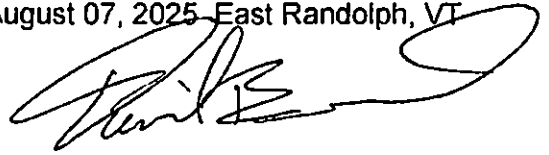
5-b- While not officially requested I did voluntarily provide copies of all statements, checks written, and deposit slips provided to me by the bank for Brassard Sugarworks and Maple Supply LLC on July 21, 2025. See Exhibit D for the COS and an example of one of the months provided.

5-c This statement is false. In documents provided on June 5, 2025 the following bates numbers DB00745, DB00746, DB00748, DB00750, DB00762, DB00763, DB00764,

DB00768, DB00769, DB00770, DB00771, DB00784, DB00795, DB00795, DB00799 will show deposits after November 17, 2020 (Exhibit F)

At this time, I have provided everything they've asked for although their requests continue to change. I see no reason to award the Plaintiff any of the relief or sanctions they're seeking.

Dated August 07, 2025 East Randolph, VT

A handwritten signature in black ink, appearing to read 'Daniel Brassard', with a large, stylized flourish at the end.

Daniel Brassard Pro Se

Exhibit

A

VERMONT SUPERIOR COURT
Orange Unit
5 Court Street
Chelsea VT 05038
802-685-4610
www.vermontjudiciary.org



CIVIL DIVISION
Case No. 23-CV-02848

John Durkee, Executor of the Estate of H. Blaisdell, Jr. v. Trini Brassard, et al

DECISION ON MOTION
(Confidentiality Order)

After consideration of the arguments presented by the parties as to the production of certain requested documents, the Court hereby ORDERS as follows:

1. This Order (hereinafter, "Order") shall govern the production of financial documents to include, without limitation, certain documents consisting of the Defendants' personal financial records and information ("Confidential Information") sought in discovery by the Plaintiff and relevant to Plaintiff's claims as defined by V.R.C.P. 26(b).
2. The party from whom the Confidential Information is sought (the "Producing Party"), shall, within thirty (30) days of receipt by counsel of a copy of this Order, provide copies of the requested Confidential Information to the party that has made the discovery request, whether formal or informal (the "Requesting Party"). Each page of the documents provided shall be marked with a letter sequence unique to the Producing Party, identifying the Producing Party and a number sequence uniquely identifying each page produced ("Bates-number"), and bearing the following legend: "**Confidential Information—Produced Subject to Confidentiality Order in Case No. 23-CV-02848.**"
3. If a Requesting Party objects to the classification of a document as Confidential Information, it shall notify the Producing party of the objection, and the parties shall consult to resolve the objection. If the objection is not resolved by good faith consultation, then the Requesting Party may make a motion for the Court to determine if they are properly classified as Confidential Information. Such a motion, if made, shall consolidate all of the Requesting Party's objections concerning classification into a single motion.

4. To the extent any Party has already produced Confidential Information, this Order will apply to such Confidential Information already produced and documentation to be produced.
5. Confidential Information shall be used by the Parties solely for purposes of preparing for and conducting the litigation and/or settlement of this matter, Docket No. 23-CV-2848, (including any related appellate proceedings). Such use is limited and defined by the provisions of this Order. Confidential Information may not be used for any other purpose or disseminated to any individual or entity that is not identified below.
6. Discoverable Confidential Information shall be disclosed or made available by the Requesting Party and/or their counsel only to "Qualified Persons" who shall consist solely of:
 - a. The Court, court personnel, and court reporters;
 - b. Deposition witnesses, only by agreement of the Party who produced the Discoverable Confidential Information (or, absent agreement, by order of the Court) and only after review of and agreement by each witness to be bound by the terms of this Order, evidenced by signing a copy of this Order;
 - c. Any person engaged by counsel to the parties in this matter or by the Parties to assist in litigation, including experts, consultants or others who are assisting a Party's counsel in this matter, only by agreement of the Party who produced the Discoverable Confidential Information (or, absent agreement, by order of the Court) and only after review of and agreement by each such person to be bound by the terms of this Order; and
 - d. Mediator(s) retained jointly by the parties, only by agreement of the Party who produced the Discoverable Confidential Information (or, absent agreement, by order of the Court) and only after review of and agreement by each such mediator(s) to be bound by the terms of this Order.
7. Other than as set forth above, Confidential Information may not be disclosed to any other person absent a further Court Order authorizing such disclosure(s).
8. All parties and counsel as well as all Qualified Persons, as defined above, shall hold any and all Confidential Information in absolute confidence, and may only use and disclose such information as authorized by this Order.

9. To the extent any Party wishes to use any Confidential Information in connection with any pleading, motion, or other submission to the Court, all such submissions must be filed with the Court under seal.
10. The Parties may disclose Confidential Information as needed during the course of any hearing, trial, or other proceeding in open Court (including in connection with obtaining testimony from any witness, making offers of proof, etc.), provided that the Requesting Party seeking to disclose the Confidential Information shall give the Producing Party advance notice, and either Requesting or Producing Party may at his or her option ask the Court at the time to hold such Confidential Information in a sealed file.
11. Nothing herein shall be construed to impact in any way the admissibility of any document, testimony, or other evidence at trial in this matter. Nothing herein shall require the disclosure of material which counsel for any Party contends is protected from disclosure by the attorney-client privilege, the work product doctrine, or any other applicable privilege, nor shall anything herein constitute a waiver of any claim of privilege or other protection from discovery. Nothing herein shall be deemed as a modification or expansion of the scope of the rules of civil procedure and evidence with respect to the discoverability and/or admissibility of any document or other information or materials produced during the course of this matter. Nothing in this Order shall be deemed to preclude a Party from seeking and obtaining, on an appropriate showing, additional protection with respect to the confidentiality of documents, testimony, court papers, or other matters.
12. Nothing herein shall be construed to limit in any way either Party's individual or personal use of Confidential Information related specifically to that Party's Confidential Information.
13. If Confidential Information is disclosed to any person other than in the manner authorized by his Order, the Requesting Party responsible for the disclosure shall, upon learning of the disclosure, inform counsel for the Producing Party and shall make every reasonable effort to retrieve the materials and prevent disclosure by the unauthorized person who received such information. The Producing Party affected by such a disclosure may seek sanctions, attorney's fees, or any other relief afforded by law.
14. The termination of this matter shall not relieve any Requesting Party to whom Confidential Information has been disclosed from the obligations of this Order. Every Qualified Person holding Confidential Information shall certify to counsel that they have returned all copies of the

Confidential Information and/or have destroyed such copies in their possession. Counsel shall share all such certifications with opposing counsel. Counsel for each Party may retain one copy of the Confidential Information contained in his/her files provided that the confidentiality provisions are continued and preserved. Any such copies shall not be considered part of the client and file and need not be returned to the client as part of any return of client files but may be retained and destroyed as part of Counsel's record-keeping policies and practices. All duplicate copies shall be destroyed or returned to the Producing Party within 30 days.

So Ordered.

Electronically signed on 4/28/2025 2:14 PM pursuant to V.R.E.F. 9(d)


Daniel Richardson
Superior Court Judge

Exhibit

B

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.)

**PLAINTIFF'S FIRST SET OF INTERROGATORIES
AND REQUESTS TO PRODUCE TO DEFENDANT DANIEL BRASSARD**

NOW COMES Plaintiff JOHN DURKEE, EXECUTOR OF THE ESTATE OF
DECEDENT KENNETH H. BLAISDELL, JR., by and through his attorneys, PRIMMER PIPER
EGGLESTON & CRAMER, PC, and pursuant to V.R.C.P. 26 *et. seq.*, hereby PROPOUNDS the
within Interrogatories and Requests to Produce to Defendant DANIEL BRASSARD, to be
answered under oath and within the time prescribed by the Rules.

Definitions

In answering each Interrogatory or Request to Produce, the following definitions apply:

1. "Address" means, unless otherwise specified, the business and residence address,
including city or town and zip code, and business and residence telephone number
(including extension, if any).
2. "Complaint" means the Complaint filed by the Plaintiff in this action.
3. "Identify" means, with respect to Records, that the answer shall state the following
information as to each such Record:

- a. the title, heading, or caption of such document if any;
- b. the identifying number, letter, or combination thereof, if any, and the significance or meaning of such, if computerized, then computer access code;
- c. the date appearing on such document, and if no date appears thereon, the answer shall so state and shall give the date, or approximate date, on which this document was prepared;
- d. the general nature or description of such document (i.e., whether it is a letter, memorandum, minutes of meeting, etc.) and the number of pages of which it consists;
- e. the name of the person who signed such document, and if it is not signed, the answer shall so state and shall give the name of the person who prepared it;
- f. the name of the person to whom such document was addressed and the name of each person, other than such addressee to whom such document, or a copy thereof, was sent; and,
- g. the name of the person who has custody of such document.

The foregoing information shall be given in sufficient detail to enable a party or person to whom a subpoena is directed to identify documents sought to be produced, and to enable Defendants to determine that such document when produced is in fact the document so described. In lieu of the identification of documents as provided for above, you may attach copies of such documents to your response and incorporate the same by reference in your response.

- 4. "Identify" means, with respect to any individual person, that the response shall state, to the extent known, the person's present home address, present home telephone number,

present business address, present business telephone number, present employer, present title, present job description, and age. If you do not know the person's present home address, you shall so state and list the person's last known home address.

5. "Record" or "Records" means all documents, communications, text messages, emails, social media posts, video and audio recordings, photographs, memoranda, letters, reports, notes, tabulations, computations, lists, journals, diaries, calendars, drawings, photographs, videos, sketches, charts, graphs, and other similar objects or written things regardless of format or characteristics, including electronically stored information (ESI), digital and electronic records, computer files or other recorded data, and every other type of data compilation from which information can be obtained, translated or transcribed, whether originals or copies. "Record" or "Records" shall include all documents, objects, and similar things prepared by or in the possession, custody, or control of Defendants or their agents, representatives, or attorneys.
6. "Plaintiff" means Plaintiff John Durkee, Executor of the Estate of Decedent Kenneth H. Blaisdell, Jr.
7. "You" or "your" means Defendant Daniel Brassard and his respective attorneys, agents, and any other person acting on his behalf or at his instruction.
8. "Thad's Parcel" means 102.9 Acres located at 505 Vt Rte 14 N, Randolph, VT.
9. "Decedent" means Kenneth H. Blaisdell, Jr.
10. "POA Agent" means Trini Brassard.

Instructions

1. In answering these Interrogatories and Requests to Produce, you must furnish all records in your possession, custody, or control, including all information in the possession,

custody, or control of any person acting on your behalf. If you do not possess all of the information requested in an Interrogatory or Request to Produce, you must provide as much of the information as you do possess.

2. If any answer is based on information and belief rather than personal knowledge, state that it is made on that basis and identify the name of the person who provided the information.
3. In construing these Interrogatories and Requests to Produce: (i) the singular shall include the plural and the plural shall include the singular; (ii) masculine or feminine pronouns shall not exclude other genders; (iii) the conjunctions "and" and "or" shall be read either disjunctively or conjunctively so as to be applied as broadly as possible and to bring within the scope of the Request all information that might otherwise be construed to be outside its scope; (iv) each of the words "all," "each," "any," and "every" shall be deemed to include each of the other functional words; (v) the definition of each term defined above shall be used regardless of whether the term is capitalized; and (vi) the past tense of a verb used herein includes the present tense and the present tense includes the past tense. In every such instance, the specific Request shall be construed in the broadest sense so as to call for the most complete and inclusive answer.
4. For all records requested herein that have been destroyed or otherwise discarded, identify each such destroyed or discarded document and state:
 - a. the date it was destroyed or discarded;
 - b. the reason it was destroyed or discarded; and
 - c. the name of the person responsible for destroying or discarding it.

5. Where information or documentation requested is objected to on grounds of privilege or deemed non-discoverable on grounds of privilege or for any other reason, please: (i) identify each item of information or document so claimed to be protected by privilege or otherwise non-discoverable; (ii) describe, generally, the nature of the information or the type of documentation not being produced without disclosing its substance; (iii) state the nature of the claim or privilege or ground for non-disclosure being asserted; and (iv) state the facts relied on for the claim of privilege or non-disclosure.
6. These interrogatories and requests for production of documents shall be deemed continuing. When necessary to reflect events occurring and information becoming available after the filing of your initial responses, you are to promptly supplement your responses to these interrogatories.

Interrogatories

1. State your full name, date of birth, home address, occupation, and business address.
2. Describe the highest level of education achieved, including the identity of the school and degree awarded.
- ✓ 2. Identify all banking or other financial institutions where you have held personal or business accounts from July 18, 2013 to the present.
3. Identify all banking or other financial institutions where you have obtained mortgages from July 18, 2013 to the present, the purposes for those mortgages and any collateral offered.
4. Identify all real estate that has been deeded to you from July 18, 2013 to the present, including the address, lot number, town or village, date deeded, and the amount paid by you, or others on your behalf, for said property.

5. Identify all credit card accounts in your name open during any portion of the period July 18, 2013 to the present.
6. Identify all monies received by you from July 18, 2013 to the present from the Decedent and/or the Decedent's POA Agent, including the date, amount and type of monetary transaction, such as gifts, payments for work, reimbursement for expenses, etc.
7. Identify all monies paid on your behalf to any creditor of yours from July 18, 2013 to the present by the Decedent and/or the Decedent's POA Agent, including the date, amount and type of monetary transaction.
8. Identify all gifts purchased for you from July 18, 2013 to the present by the Decedent and/or the Decedent's POA Agent, including the date, amount and type of gift, such as a motor vehicle, mobile home, etc.
9. Identify all items purchased on your behalf from July 18, 2013 to the present by the Decedent and/or the Decedent's POA Agent, including the date, amount and type of item, including but not limited to personal property and equipment such as ATVs, guns, tractors, and wood chippers.
10. Identify all barter transactions made by you or on your behalf, using property of the Decedent and/or the Decedent's POA Agent including but not limited to hay, timber, and gravel, and identify the property you received in exchange for such items.
11. Identify all of your sources of income from July 18, 2013 to the present, including the name and address of the source of income and the amount and nature of the income, such as wages, contractor payments, interest, rental income, sale of goods or property, etc.

13. Identify any payments you have made to the Decedent and/or the Decedent's POA Agent from July 18, 2013 to the present, including an explanation of the reason such payment was made.
14. Identify any leases entered into between you and the Decedent from July 18, 2013 to the present.
15. Describe your job duties, specific expertise necessary for your professional career, the length of time you have been at your current position, and any certification or licensing necessary to hold the title you currently hold.
16. Describe all communications among you, the Decedent, and any other person in July 2013, after the Decedent suffered a stroke, which led to the Decedent appointing Defendant Trini Brassard as his agent under his Durable Power of Attorney.
17. Describe your role in the Decedent's farming operation from July 2013 – present, including how you were paid for labor.
18. Identify the names, addresses, and phone numbers for any customer of the Decedent's hay who paid you cash or wrote a check payable to you rather than Kenneth H. Blaisdell, Jr., and provide copies of these same cancelled checks as well as copies of deposit slips showing where money was deposited.
19. Describe how you were compensated for hay production from 2013 – 2021, and provide copies of cancelled checks and deposit slips made by you to deposit this compensation into bank accounts.
20. Describe how often the Decedent worked on his farm after July 2013, and include in your description the number of hours a week he would typically work, the specific tasks he performed, and the individuals who worked with him during this same time.

21. Describe your understanding of who was to inherit "Thad's Parcel" you and your wife, Brittany Greene, resided at under the terms of lease executed by you and Co-Defendant Trini Brassard.
22. Identify the monies you paid to the Decedent between July 2013 and April 2021 to lease various parcels of land owned by him.
23. Identify the monies you paid to the Decedent between July 2013 and April 2021 to use farm equipment owned by him.
24. Describe your employment activities between July 2013 to the present, including any self-employment activities, day-work farm laborer, day-work hay laborer, livestock sales, maple sugar sales, and any other activity you engaged in for income.
25. Identify the names of all individuals or entities that paid you income for these same employment activities between July 2013 – present.

Requests for Production

1. With respect to each and every response to the foregoing Interrogatories, produce all documents identified in your response.
2. With respect to all payments made or received, produce all written or electronic evidence of such payments including but not limited to canceled checks, wire transfer confirmations, deposit slips and receipts. Include any and all deposit slips and/or copies of the check(s) corresponding to each such deposit.
3. With respect to all real estate identified in response to the foregoing Interrogatories, produce copies of deeds and proofs of payment for the property.

4. With respect to any item purchased either in full or in part for you or on your behalf that required a title, including but not limited to a car, truck, mobile home, or motor home, produce a copy of such document.
5. With respect to any item purchased either in full or in part for you or on your behalf that required a title, including but not limited to a vehicle, ATV, mobile home, or motor home, produce a copy of such document.
6. With respect to any leases, personal, business, or cosigned to, produce a copy of the lease.
7. Produce a complete copy of your Federal and State income tax returns from 2013 to the present, including all depreciation schedules and all source documents related to each return (including but not limited to W-2's, 1099s, and all schedules to each such tax return such as K-1s, and copies of invoices and bills of sale for any assets purchased or sold).
- 8. With respect to all banks and other financial institutions at which you have held an account from July 18, 2013 to date, produce a copy of your monthly bank statements and copies of canceled checks, deposit slips, and wire transfer confirmations.
9. Produce a complete copy of Vermont Department of Motor Vehicle records linked to your driver's license, and/or your name from July 18, 2013 to date, including new registrations for cars, trucks, trailers, motor homes, farm equipment, ATVs, boats, and campers.
10. Produce customer lists for all self-employment activities described above, including the names, addresses, and phone numbers between July 2013 – April 2021.

11. Produce farm leases to produce hay, maple syrup products, timber, gravel, or any other agricultural product between July 2013 – April 2021.
12. Produce copies of livestock auction sales between July 2013 – April 2021.

DATED at Woodstock, Vermont, this 29TH day of September, 2023.

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

/s/ Elizabeth Willhite
Elizabeth Willhite, Esq.
43 Lincoln Corners Way, Suite 205
Woodstock, Vermont 05091
rwindish@primmer.com | 802.457.8128
ewillhite@primmer.com | 802.371.5202
***Attorneys for John Durkee, Executor of the Estate
of Kenneth H. Blaisdell, Jr.***

Exhibit

C



**PRIMMER PIPER
EGGLESTON &
CRAMER PC**

ELIZABETH A. WILLHITE
ADMITTED IN VT AND NH
ewillhite@primmer.com
TEL: 802-864-0880
FAX: 802-864-0328

43 Lincoln Corners Way, Suite 205 | Woodstock, VT 05091

July 11, 2025

(VIA EMAIL)

brassardsugarworks@gmail.com

Dan Brassard

**Re: *John Durkee, Executor of Estate of Kenneth H. Blaisdell, Jr.*
v. Trini Brassard, et al.
Docket No.: 23-CV-02848**

Dear Dan,

This letter is being sent pursuant to the V.R.C.P. 26, 33, 34, and 37 as a supplement to our Requests to Produce and Interrogatories dated September 29, 2023. As required by V.R.C.P. 26(c)(1), this letter is being sent in good faith and is our effort to resolve the dispute outlined below. If there is a need to conference, we will participate.

Discovery Obligations under V.R.C.P. 26, 33, 34, 37.

Plaintiff may use interrogatories (Rule 33) and request to produce (Rule 34) to obtain discovery that is "relevant to his claims" and "proportional to the needs of the case." V.R.C.P. 26(b). See Rule 26(b)(1)

In addition, because the Court addressed your confidentiality concerns and issued an order governing the production of financial documents on April 30, 2025, any objection from you based on confidentiality is now moot.

Missing Discovery

Bank Statements and Deposit Tickets for Brassard Sugarworks and Maple Supply LLC.

To date, you have not provided any bank statements or deposit information of any kind relating to Brassard Sugarworks and Maple Supply LLC. As explained in the Court's Confidentiality Order, Plaintiff is entitled to these documents and information. Please produce these records promptly.

Unredacted Copies of Deposited Checks

On June 9, 2025, pursuant to the Court April 30, 2025 order (the "Confidentiality Order"), you provided copies of financial records. However, there are multiple deposited checks where the account owner is redacted, and memo line is redacted or unreadable. These records

Brassard, Daniel
July 11, 2025
Page 2 of 2

are labeled: DB00041; DB00054-55; DB00068-70; DB00078; DB00081-82; DB00091;
DB00102-103; DB00111; DB00122-123; DB00132; DB00144; DB00155; DB00164-165;
DB00186; DB00188; DB00196; DB00198-199; DB00212; DB00214; DB00233-235; DB00239;
DB00255-56; DB00258; DB00267; DB00269; DB00284; DB00299-DB00300; DB00313;
DB00322; DB00342-344; DB00357; DB00366; DB00373; DB00396-397; DB00416; DB00452-
453; DB00469; DB00487-88; DB00491-495; DB00508; DB00518-519; DB00561; DB00627-
629; DB00647; DB00668; DB00669; DB00670; DB00672; DB00691-694; DB00708-713;
DB00730-733; DB00796; DB00798.

Your production of these redacted and unreadable statements fails to comply with Rule 33 as the answers to Plaintiff's Interrogatories may not be derived or ascertained from the redacted records. Plaintiff is unable to determine what each payment was for, for whom, and its relationship to a contract, invoice, or otherwise.

The information sought is responsive to Plaintiff's discovery request and is relevant to Plaintiff's claims. Thus, it must be provided. Further, your objection based on concerns that we would contact clients and allegedly damage your reputation fails as these concerns would be covered under the court's Confidentiality Order.

Please produce all the requested information within the next ten business days. Alternatively, we will request the court intervene to decide this issue.

Sincerely,

/s/ Elizabeth Willhite

Elizabeth Willhite

Exhibit

D

SUPERIOR COURT
Orange ☐ Unit

STATE OF VERMONT

Civil DIVISION
Docket No. 23-CV-02848

Est of Kenneth Blaisdell v. Trini Brassard, et al

CERTIFICATE OF SERVICE

I certify that I have today delivered the following documents to all other parties to this case:

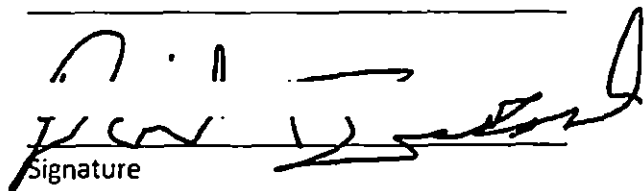
Brassard Sugarworks LLC bank records Via Dropbox to Plaintiffs council

- ☐ By first class mail by depositing it in the U.S. mail;
☐ By personal delivery to _____ or his/her counsel;
☒ Other: Explain: via Email/Dropbox

The names and addresses of the parties/lawyers to whom the mail was addressed or personal delivery was made are as follows: *(Attach additional sheets, if necessary)*

Name	Address
<u>Brian Falzo</u>	<u>Firefighter82093@aol.com</u>
<u>Trini Brassard - Barney Brannen</u>	<u>bbrannen@brannen_loftus.com</u>
<u>Courtney Brassard- Todd Steadman</u>	<u>steadman@whiteriverlawyers.com</u>
<u>Rich Windish</u>	<u>rwindish@primmer.com</u>
<u>Elizabeth Wilhite</u>	<u>ewillhite@primmer.com</u>
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

Dated
7/20/2025


Signature
Daniel Brassard
Print Name

Counsel



File Edit

DB



← 2 of 20 →



Share

View Help

Page 4 of 138

Open in ▾

Edit



100% ▾



Confidential Information - Produced Subject to Confidentiality Order in Case No. 23-CV-02848

Primary Account: 6550193185
Date: 3/31/2021 Page: 4 of 4**BAR HARBOR**
BANK & TRUST

BRASSARD EQUIPMENTWORKS & SUPPLY
DAN BRASSARD
1037
Pay to the order of: [Redacted]
\$739.36
Date: 3/3/2021

Date 3/3/2021 Amt \$739.36

BRASSARD EQUIPMENTWORKS & SUPPLY
DAN BRASSARD
1038
Pay to the order of: [Redacted]
\$4,467.00
Date: 3/8/2021

Date 3/8/2021 Amt \$4,467.00

BRASSARD EQUIPMENTWORKS & SUPPLY
DAN BRASSARD
1039
Pay to the order of: [Redacted]
\$394.00
Date: 3/22/2021

Date 3/22/2021 Amt \$394.00

BRASSARD EQUIPMENTWORKS & SUPPLY
DAN BRASSARD
1038
Pay to the order of: [Redacted]
\$165.00
Date: 3/1/2021

Ch# 1038 Date 3/1/2021 Amt \$165.00

BRASSARD EQUIPMENTWORKS & SUPPLY
DAN BRASSARD
1040
Pay to the order of: [Redacted]
\$1,725.00
Date: 3/19/2021

Ch# 1040 Date 3/19/2021 Amt \$1,725.00

BRASSARD EQUIPMENTWORKS & SUPPLY
DAN BRASSARD
1041
Pay to the order of: [Redacted]
\$250.00
Date: 3/11/2021

Ch# 1041 Date 3/11/2021 Amt \$250.00

DB00999



File Edit

DB



← 2 of 20 →



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Page 5 of 138

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Edit



100%



Confidential Information - Produced Subject to Confidentiality Order in Case No. 23-CV-02848



Brassard Sugarworks and Maple Supply LLC
849 VT Rte 14
East Randolph VT 05041

Date 2/26/21
Primary Account
Enclosures

Page 1

SUMMARY OF ACCOUNTS

Account Number	Account Title	Current Balance
XXXXXX3165	Easy Business Cking	1,642.03

Checking Account

Easy Business Cking	Account Number	XXXXXX3165	Check Safekeeping	
Previous Balance		9,942.84	Statement Dates	2/01/21 thru 2/28/21
5 Deposits/Credits		25,781.94	Days in the statement period	28
24 checks/Debits		34,082.75	Average Ledger	11,567.93
Service Charge		.00	Average Collected	11,567.93
Interest Paid		.00		
Current Balance		1,642.03		

Activity in Date Order

Date	Description	Credit	Debit	Balance
2/01	POS DEB 1734 01/30/21 161001 NST THE HOME DEP WEST LEBANONNH Card# 0574		168.45-	9,774.39
2/01	DBT CRD 2003 01/31/21 203814 PVC PIPE SUPPLIES 6628954337MS Card# 0574		276.36-	9,498.03
2/03	Deposit	14,900.00		24,398.03
2/05	POS DEB 1727 02/05/21 787828 PUMP & PANTRY WILLIAMSTOWNVT Card# 0574		73.09-	24,324.94
2/08	POS DEB 0825 02/08/21 710400 RANDOLF TENNEYBR RANDOLPHVT Card# 0574		12.45-	24,312.49
2/08	Check 1034		250.00-	24,062.49
2/09	210209P2 Square Inc CCD 9424300002 L210598567915	174.48		24,236.97
2/10	Check 1035		20,000.00-	4,236.97
2/11	Deposit	1,748.00		5,984.97
2/11	DBT CRD 0853 02/11/21 634077 CENTRAL SUPPLIES RANDOLPHVT Card# 0574		9.67-	5,975.30
2/16	POS DEB 1154 02/13/21 459887 CENTRAL SUPPLIES		126.79-	5,848.51

DB01000

Exhibit

E

7/24/2025 8:59 PM

----- Forwarded message -----
From: Amanda Weeks <amandaw@whitercu.com>
Date: Wed, Jul 23, 2025, 12:43 PM
Subject: RE: Checks
To: Dan Brassard <dbrassard32@gmail.com>

Perfect. Just so you are aware, there were quit a few checks deposited in that timeframe. I will get back to you shortly with the fee for the printing.

Best Regards,



Amanda Weeks
MSR

White River Credit Union
(802) 728-9228 | (800) 891-3332 | (802) 728-7121
www.whitercu.com

White River Credit Union is not liable for delayed transaction posting or informational requests sent directly to individual staff members. In the event of staff absences, e-mail boxes cannot be guaranteed to be monitored. To avoid delays, communications should be sent to info@whitercu.com, securely through our [online banking platform](#), or called into an office. For your protection, we remind you that this e-mail is an unsecured communication which means it is not intended for sending confidential or sensitive information. Please do not include your social security number, account number, driver's license number, credit or debit card number or any other personal or financial information in the content of any e-mail communication. This communication, and any associated attachments, is intended solely for the individual or entity to whom it is addressed and may contain information that is privileged, confidential or otherwise protected from disclosure. If you have received this communication in error, please notify us immediately.

From: Dan Brassard <dbrassard32@gmail.com>
Sent: Wednesday, July 23, 2025 12:39 PM
To: Amanda Weeks <amandaw@whitercu.com>
Subject: Re: Checks

WRCU Security Filter

Warning: Sender address dbrassard32@gmail.com is not verified by your organization.
Please be cautious of any requests for sharing of the UICU's

[Report Phishing](#) [Mark Safe](#)

Generated by Microsoft

Yes that is correct

Thanks
Dan

On Wed, Jul 23, 2025, 12:36 PM Amanda Weeks <amandaw@whitercu.com> wrote:

Good Afternoon, Dan. This is Amanda at the White River Credit Union.

I did call you, but your voicemail is full and I couldn't leave a message. You only needed printed copies of the checks that were deposited, correct? The timeframe we can print is only January 2017 - March 2021. I just want to verify the time frame before we calculate the fee for printing the check copies and research.

Thank you

Best Regards,

Amanda Weeks
MSR

White River Credit Union
(802) 728-9228 | (800) 891-3332 | (802) 728-7121
www.whitercu.com

White River Credit Union is not liable for delayed transaction posting or informational requests sent directly to individual staff members. In the event of staff absences, e-mail boxes cannot be guaranteed to be monitored. To avoid delays, communications should be sent to info@whitercu.com, securely through our [online banking platform](#), or called into an office. For your protection, we remind you that this e-mail is an unsecured communication which means it is not intended for sending confidential or sensitive information. Please do not include your social security number, account number, driver's license number, credit or debit card number or any other personal or financial information in the content of any e-mail communication. This communication, and any associated attachments, is intended solely for the individual or entity to whom it is addressed and may contain information that is privileged, confidential or otherwise protected from disclosure. If you have received this communication in error, please notify us immediately.

- image002.jpg (3 KB)
- image002.jpg (3 KB)

Exhibit

F

Summary

Description	Deposit
Transaction Date	Dec 14, 2020
Check amount	\$100.00
Cash Amount	\$900.00
Balance	\$1,481.83
Total	\$1,000.00

Deposit Distribution

...4332 - 2 \$1,000.00

Checks

Check #1
\$100.00

Hide

Print Check

SPRAYED ON SYSTEMS LLC
12/8/20
866
Pay to the Order of Danville Brassard \$ 100.00
One Hundred Dollar Dollars
KeyBank National Association
1888 KEY4DIZ Key.com
For Syrup Todd Frier
⑆ 211672531⑆

WHITE RIVER CREDIT UNION
12/14/2020 09:21:21
RGT 211641279 B-03 T-12
758085

Printed

Summary.

Description	Deposit
Transaction Date	Dec 24, 2020
Check amount	\$666.59
Balance	\$1,207.49
Total	\$666.59

Deposit Distribution

...4332 - 2 \$666.59

Checks

Check #1
\$184.52

Hide |
Print Check |

CASH ONLY IF ALL CASH - SECURITY FEATURES LISTED ON EACH MONITOR NO TAPPLING OR COPY	
Bolduc Auto Salvage, Inc. 1000 1st St. Birmingham, AL 35203 (205) 325-1111	149996
Model: <u>1984 DODGE</u>	1984
Year: <u>1984</u>	1984
Make: <u>DODGE</u>	1984
Color: <u>Black</u>	1984
Engine: <u>2.0L</u>	1984
Transmission: <u>4-Speed</u>	1984
Drive: <u>Front</u>	1984
Body: <u>4-Door</u>	1984
Options: <u>None</u>	1984
Price: <u>\$1,000.00</u>	1984
Buyer: <u>DAVID BACHARD</u>	1984
Seller: <u>DAVID BACHARD</u>	1984
Address: <u>1000 1st St.</u>	1984
City: <u>Birmingham</u>	1984
State: <u>AL</u>	1984
Zip: <u>35203</u>	1984
Signature: <u>[Signature]</u>	1984
Stamp: <u>[Stamp]</u>	1984

104-6446P (OFFICE 10022)
 10/10/97 10/10/97
 10/10/97 10/10/97 10/10/97
 10/10/97

Check #2
\$482.07

Hide
Print Check

Summary

Description Deposit
Transaction Date Dec 28, 2020
Check amount \$468.90
Balance \$795.95
Total \$468.90

Deposit Distribution

***4332 - 2 \$468.90

Checks

Check #/1

\$468.90

Hide

Print Check

Printed on 12/28/2020 at 10:00 AM. This document is a copy of the original document. It is not a legal document. It is for informational purposes only.

DCI INC.
10000 W. 10TH AVE. SUITE 100
DENVER, CO 80202

Check # 4332 - 2 \$468.90

Year	Check Date	Check No.
2020	12/28/2020	4332 - 2
Check Amount		
\$468.90		

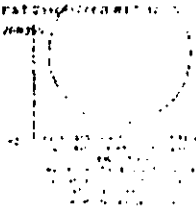
DCI INC.
10000 W. 10TH AVE. SUITE 100
DENVER, CO 80202

SECRET COUNTRY CODE

Handwritten signature

[Redacted line]

WRITE NAME OF BANK
ON CHECK
FOR DEPOSIT ONLY
DO NOT WRITE
HERE



12/28/2020
\$468.90
4332 - 2

Summary

Description	Deposit
Transaction Date	Jan 11, 2021
Check amount	\$2,400.00
Balance	\$2,967.03
Total	\$2,400.00

Deposit Distribution

***4332 - 2 \$2,400.00

Checks

Check #1
\$600.00

Hide

Print Check

United States Treasury H 213,628,599

01 06 21 20090800 KANSAS CITY, MO 4043 13664218
000615819479 4043 13664218 J 20203630810002

DANIEL H BRASSARD
849 VT ROUTE 14 N
EAST RANDOLPH VT 05041 9533

\$*****600*00

ECONOMIC IMPACT PAYMENT
PRESIDENT DONALD J. TRUMP

WARNING - DO NOT CASH CHECK WITHOUT
NOTING THE WATERMARK
HOLD TO LIGHT TO VERIFY WATERMARK

White River Credit Union
AT 11/20/21 11 10 15
BAT 211501278 311 11

Check #2
\$1,800.00

Hide

Print Check



01 05 21 2009C800 KANSAS CITY, MO 4043 13664217
G00615819478 4043 13664217 1 20203630810002

BRILLANT M GREENE
849 VI ROUTE 14 N
EAST RANDOLPH VT 05041 9533 S+--+1800+0

ECONOMIC IMPACT PAYMENT
PRESIDENT DONALD J. TRUMP

2001E R 078 (REF: 11601)
 01-10-2001 12:42:15
 621 2382527*6 01-1-12
 2001E

WARNING - DO NOT CASH CHECK WITHOUT
NOTING WATERMARK
HOLD TO LIGHT TO VERIFY WATERMARK

Summary

Description	Deposit
Transaction Date	Jan 22, 2021
Check amount	\$1,000.00
Balance	\$1,384.69
Total	\$1,000.00

Deposit Distribution

---4332 - 2 \$1,000.00

Checks

Check #1
\$1,000.00

Hide

Print Check

BRASSARD SELF-STORAGE LLC		0132
10001 1st St Barnesville, GA 30004		
Date: 1-22-21		
Pay to the order of: Brittany Greene		\$ 1000.00
One Thousand and 00/100		Dollars
BAR HARBOR BANK & TRUST		
10001 1st St Barnesville, GA 30004		
[Redacted Signature]		

WHITE RIVER CREDIT UNION
MEMBER SINCE 1981
9401 WILSON BLVD
BARNESVILLE, GA 30004

Credit to the Account of
the Within Named Payee
White River Credit Union

Summary.

Description	Deposit
Transaction Date	Jan 29, 2021
Check amount	\$2,141.00
Balance	\$3,511.89
Total	\$2,141.00

Deposit Distribution

...4332-2 \$2,141.00

Checks

Check #1
\$141.00

Hide

Print Check

ANITA M. GREENE
PH. 892 726-4710
P O BOX 472
HARDOLPH, VT 05640

3838
NEW 2047116

1-28-21

Date

Pay to the
Order of Brittany Brassard \$141.00

One hundred forty one Dollars

 **Northfield**
SAVINGS BANK

For Am Greene

01:29:2021 16:11:17
 R&T-211691279 B-01 T-12
 26552.1

Check #2
\$1,000.00

: Hide :

Print Check

BRASSARD SELF-STORAGE LLC
0134
01/21/23
\$1,000.00
DAN HANCOCK BANK & TRUST
Pay to the order of [Redacted]
[Signature]

AMERICAN CREDIT REPORT
1000 1/20/2023
1000 1/20/2023
1000 1/20/2023

Check #3
\$1,000.00

Hide

Print Check

BRASSARD SELF-STORAGE LLC NO. 401 202 610 57 07 11 11 EAST BARTON CT. 07 0000		0133 0133 0133
Date: 1-24-21		1-24-21
To: [Redacted]		1-24-21
BAR HARBOR BANK & TRUST 1000 1000 1000		1-24-21
Pay to the order of: [Redacted]		1-24-21
Amount: [Redacted]		1-24-21
AND I HEREBY CERTIFY THAT THIS CHECK IS IN FULL PAID TO THE ORDER OF THE CHECKEE		1-24-21

Summary

Description	Deposit
Transaction Date	Mar 30, 2021
Check amount	\$1,400.00
Balance	\$6,564.16
Total	\$1,400.00

Deposit Distribution

...4332 - 2 \$1,400.00

Checks

Check #1
\$1,400.00

Hide

Print Check

 **United States Treasury** 1231 650 B 282,084,846

US 76 21 20090800 KANSAS CITY, MO 4344 12039799
000656270678 4044 12039799 1 20210770810003

Pay to the order of
DANIEL H BRASSARD
849 VT ROUTE 14 N
EAST RANDOLPH VT 05041 9533

1***-1400*00
VOID AFTER ONE YEAR

ENCLOSURE, IMPACT PAYMENT

WHITE RIVER CREDIT UNION
BYN-0071 06 26 20
RAI-215591279 06 11 20
274114

WHITE RIVER CREDIT UNION
BYN-0071 06 26 20
RAI-215591279 06 11 20
274114

Exhibit

G

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.)

AFFIDAVIT OF ELIZABETH WILLHITE

NOW COMES Elizabeth A. Willhite, Esq., and being duly sworn, hereby deposes and certifies pursuant to Rule 26(h) and Rule 11:

1. I am over the age of 18 and otherwise competent to testify.
2. I am an attorney at Primmer Piper Eggleston & Cramer PC, which represents Plaintiff John Durkee, Executor of the Estate of Kenneth H. Blaisdell, Jr. ("Plaintiff") in this matter. Richard Windish is lead counsel on this case and I am working with Attorney Windish to prosecute these claims.
3. On September 29, 2023, Plaintiff served Defendant Daniel Brassard with written discovery requests.
4. A year later, on February 28, 2025, Defendant provided incomplete responses.
5. On April 30, 2025, the Court issued an order compelling Defendants to produce financial records and addressing Defendants' concerns regarding the confidentiality of financial

documents and information. *See* April 30, 2025 Decision on Motion (the “Confidentiality Order”).

6. The Court ordered Defendants to provide copies of the requested Confidential Information to the party that has made the discovery request within 30 days of receipt of the Confidentiality Order. *See* Confidentiality Order at ¶ 2.

7. On June 11, Defendant Daniel Brassard produced his individual bank and credit card statements, many of which were redacted. Defendant did not produce the financials for Brassard Sugarworks and Maple Supply, LLC.

8. That same day, undersigned counsel responded to Mr. Brassard to inform him that redactions on account numbers were acceptable, but not on the memo line or account holder sections. Undersigned counsel requested that Mr. Brassard produce unredacted versions of these records within 15 days.

9. In response this request, on July 1, 2025, Mr. Brassard offered to provide an explanation of these payments but refused to provide (semi) un-redacted versions, claiming his right to withhold this information based on his belief that “[wc] will contact the people using the same tone and hostile approach that you have used with me from day 1.” A true and accurate copy of the email is attached hereto as **Exhibit B**.

10. On July 11, undersigned counsel sent Mr. Brassard a Rule 26(h) letter to discuss the outstanding discovery requests. In this letter, Mr. Brassard was provided with the Bates label references for the production documents which must be produced in (semi) un-redacted form. A true and accurate copy of the letter is attached hereto as **Exhibit A**.

11. On July 21, Defendants provided the bank and credit cards statements for Brassard Sugarworks and Maple Supply, LLC.

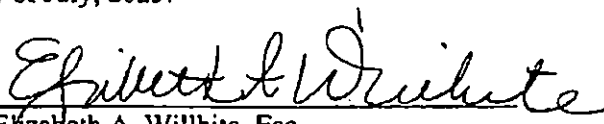
12. That same day, undersigned counsel again asked Defendants to produce (semi) un-redacted form of the financial documents referenced the July 11 letter.

13. Mr. Brassard responded to this email by first indicating that the records would come from the bank at a time that is "convenient" for the bank, and later admitted he burned the original copies of these records offering Plaintiff a 5-gallon bucket of ashes in response to these discovery requests.

14. The undersigned is unable to confer further with Defendant on these issues.

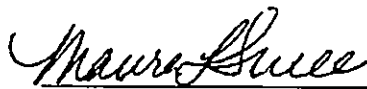
Further affiant sayeth not.

DATED at Burlington, Vermont, this 23rd day of July, 2025.


Elizabeth A. Willhite, Esq.

STATE OF VERMONT)
CHITTENDEN COUNTY)

Subscribed and sworn before me, this 23rd day of July 2025.


Notary Public
Commission expires on: 1/31/27

Maureen Lenoire Beall
Notary Public State of Vermont
Commission No. 0015678
Commission Exp: 1/31/2027

Exhibit

H

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.)

SUPPLEMENTAL AFFIDAVIT OF ELIZABETH WILLHITE
In Support Of
PLAINTIFF'S MOTION FOR SANCTIONS

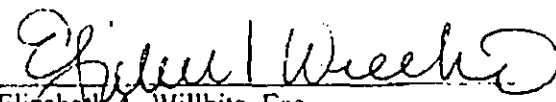
NOW COMES Elizabeth A. Willhite, Esq., and being duly sworn, hereby deposes and certifies pursuant to Rule 26(h) and Rule 11:

1. I am over the age of 18 and otherwise competent to testify.
2. I am an attorney at Primmer Piper Eggleston & Cramer PC, which represents Plaintiff John Durkee, Executor of the Estate of Kenneth H. Blaisdell, Jr. ("Plaintiff") in this matter. Richard Windish is lead counsel on this case and I am working with Attorney Windish to prosecute these claims.
3. Plaintiff filed a *Motion for Sanctions* with this Court on July 23, 2025.
4. Defendant Daniel Brassard supplemented his document production on July 24, 2025.
5. Plaintiff has reviewed this supplemental production, and now supplements the earlier facts as follows:

- a. Defendant Daniel Brassard produced some deposited checks in unredacted form on July 24, 2025;
 - b. Defendant Daniel Brassard has not produced deposited checks or deposit slips for Brassard Sugarworks and Maple Supply, LLC accounts; and
 - c. Defendant Daniel Brassard has not produced deposited checks or deposit slips from November 17, 2020 through December 31, 2021 for any of his personal or business banking accounts.
6. Plaintiff is aware that these Defendants made sizeable transactions during 2020 and 2021 which relate to the Decedent's income and Estate's assets.
 7. The parties attended a pre-mediation conference this morning.
 8. The parties intend to mediate on September 9, 2025.
 9. Plaintiff will be prejudiced if this discovery is not received before mediation.
 10. The undersigned is unable to confer further with Defendant on these issues.

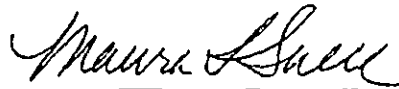
Further affiant sayeth not.

DATED at Woodstock, Vermont, this 1st day of August, 2025.


Elizabeth A. Willhite, Esq.

STATE OF VERMONT)
CHITTENDEN COUNTY)

Subscribed and sworn before me, this 1st day of August 2025.



Notary Public

Commission expires on: __/__/

Maure Lenore Snell
Notary Public - State of Vermont
Commission No. 0015876
Commission Exp: 1/31/2027