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Vermont Superior Court
Orange Unit
23-CV-02848
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July 24, 2025

(VIA EMAIL)

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Todd Steadman, Esq.

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167 North Main Street

White River Junction, Vermont 05001

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

Dear Todd,

We write in connection with your client's production, pursuant to the V.R.C.P. 26, 33, 34, and 37. On June 2, 2025, your client produced copies of her checking and savings account statements under the protection of the Court's April 30, 2025, order (the "Confidentiality Order"). However, this production was incomplete, and we are writing in our effort to resolve this dispute. This letter is sent in good faith under Rule 26(c)(1), and if there is a need to conference, we will participate.

Your client produced copies of her business checking account "Magnifique Salon, LLC" for Northfield Savings Bank ending 0911, her personal checking and savings account statements for Northfield Savings Bank ending 9518 and 5204, and joint checking account statements of your client and Defendant Brian Falzo for Northfield Savings Bank ending in 1813. However, we did not receive deposited checks and deposit slips, as requested.

We appreciate your timely attention to this matter and supplemental responses.

Sincerely,

/s/ Elizabeth Willhite

Elizabeth Willhite, Esq.

DEFENDANT'S
EXHIBIT B