

STATE OF VERMONT

VERMONT SUPERIOR COURT
Orange Unit

CIVIL DIVISION
Docket No. 23-cv-02848

JON 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.)

**DANIEL BRASSARD AND BRASSARD SUGARWORKS AND
MAPLE SUPPLY, LLC'S RESPONSES TO PLAINTIFF JOHN DURKEE'S FIRST SET
OF INTERROGATORIES AND REQUESTS TO PRODUCE**

Defendants Daniel Brassard and Brassard Sugarworks and Maple Supply, LLC ("Brassard Sugarworks"), hereby respond to PLAINTIFF JOHN DURKEE FIRST SET OF INTERROGATORIES AND REQUESTS TO PRODUCE as follows, and please excuse the numerical mistakes as I am working with the original document provided by the Plaintiffs' counsel.

Interrogatories

1. State your full name, date of birth, home address, occupation, and business address.

Response:

Daniel Brassard

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East Randolph, VT

Agriculture

East Randolph, VT

2. Describe the highest level of education achieved, including the identity of the school and degree awarded.

Response: Objection. This request is overly broad, unduly burdensome and/or unduly invasive of my privacy and is neither relevant to any party's claim or defense nor proportional to the needs of the case; in addition, the burden to me providing the requested discovery substantially outweighs the likely benefit to you of obtaining it, especially when considering the issues at stake in this case. Notwithstanding and without waiving the foregoing objection, Daniel Brassard and Brassard Sugarworks respond as follows:

I graduated from Randolph Union High School and Randolph Regional Technical Center in 2013. I have attended multiple topic specific classes, conferences and other learning opportunities. I also received on the job training for agricultural practices through

Ken Blaisdell for all the years we shared – January 1995 through April 2021.

2. Identify all banking or other financial institutions where you have held personal or business accounts from July 18, 2013 to the present.

Response: Objection. This request is overly broad, unduly burdensome and/or unduly invasive of my privacy and is neither relevant to any party's claim or defense nor proportional to the needs of the case; in addition, the burden to me providing the requested discovery substantially outweighs the likely benefit to you of obtaining it, especially when considering the issues at stake in this case. In addition, this is confidential information for which the Plaintiff cannot be trusted. There has been a serious "leak" of information to the press about the defendants prior to them even knowing the filing of the civil case was happening. I cannot trust this information if provided will be held confidential which will have an impact on my financial security.

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.

Response: Objection. This request is overly broad, unduly burdensome and/or unduly invasive of my privacy and is neither relevant to any party's claim or defense nor proportional to the needs of the case; in addition, the burden to me providing the requested discovery substantially outweighs the likely benefit to you of obtaining it, especially when considering the issues at stake in this case.

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.

Response: Objection. This request is overly broad, unduly burdensome and/or unduly invasive of my privacy and is neither relevant to any party's claim or defense nor proportional to the needs of the case; in addition, the burden to me providing the requested discovery substantially outweighs the likely benefit to you of obtaining it, especially when considering the issues at stake in this case. Also, you already have this information in your possession.

5. Identify all credit card accounts in your name open during any portion of the period July 18, 2013 to the present.

Response: I have none and did not have any credit cards open during that time period.

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.

Response: Objection. This request is overly broad, unduly burdensome and/or unduly invasive of my privacy and is neither relevant to any party's claim or defense nor proportional to the needs of the case; in addition, the burden to me providing the requested discovery substantially outweighs the likely benefit to you of obtaining it, especially when considering the issues at stake in this case. Notwithstanding and without waiving the foregoing objection, Daniel Brassard and Brassard Sugarworks state as follows:

You have all the bank records and cancelled checks and can compile this information.

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.

Response: Objection. This request is overly broad, unduly burdensome and/or unduly invasive of my privacy and is neither relevant to any party's claim or defense nor proportional to the needs of the case; in addition, the burden to me providing the requested discovery substantially outweighs the likely benefit to you of obtaining it, especially when considering the issues at stake in this case. Notwithstanding and without waiving the foregoing objection, Daniel Brassard and Brassard Sugarworks state as follows:

You have all the bank records and cancelled checks and can compile this information.

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.

Response: Objection. This request is overly broad, unduly burdensome and/or unduly invasive of my privacy and is neither

relevant to any party's claim or defense nor proportional to the needs of the case; in addition, the burden to me providing the requested discovery substantially outweighs the likely benefit to you of obtaining it, especially when considering the issues at stake in this case. Notwithstanding and without waiving the foregoing objection, Daniel Brassard and Brassard Sugarworks state as follows:

You have all the bank records and cancelled checks and can compile this information.

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.

Response: See response to Interrogatory No. 8.

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.

Response: Objection. This request is overly broad, unduly burdensome and/or unduly invasive of my privacy and is neither relevant to any party's claim or defense nor proportional to the needs of the case; in addition, the burden to me providing the requested discovery substantially outweighs the likely benefit to you of obtaining it, especially when considering the issues at stake in this case.

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.

Response: Objection. This request is overly broad, unduly burdensome and/or unduly invasive of my privacy and is neither relevant to any party's claim or defense nor proportional to the needs of the case; in addition, the burden to me providing the requested discovery substantially outweighs the likely benefit to you of obtaining it, especially when considering the issues at stake in this case.

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.

Response: Objection. This request is overly broad, unduly burdensome and/or unduly invasive of my privacy and is neither relevant to any party's claim or defense nor proportional to the needs of the case; in addition, the burden to me providing the requested discovery substantially outweighs the likely benefit to you of obtaining it, especially when considering the issues at stake in this case. Notwithstanding and without waiving the foregoing objection, Daniel Brassard and Brassard Sugarworks state as follows:

You have the bank records and can compile this information.

14. Identify any leases entered into between you and the Decedent from July 18, 2013 to the present.

Response: You already have these leases in your possession as they were turned over when you were appointed as Administrator of this estate.

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.

Response: Objection. This request is overly broad, unduly burdensome and/or unduly invasive of my privacy and is neither relevant to any party's claim or defense nor proportional to the needs of the case; in addition, the burden to me providing the requested discovery substantially outweighs the likely benefit to you of obtaining it, especially when considering the issues at stake in this case.

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.

Response: I'm not aware of any communications between me, my grandfather or any other person "Which led to" my grandfather appointing my mother as his agent under the 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.

Response: Objection. This request is overly broad, unduly burdensome and/or unduly invasive of my privacy and is neither relevant to any party's claim or defense nor proportional to the needs of the case; in addition, the burden to me providing the requested discovery substantially outweighs the likely benefit to you of obtaining it, especially when considering the issues at stake in this case. Notwithstanding and without waiving the foregoing objection, Daniel Brassard and Brassard Sugarworks state as follows:

You have the bank records and invoices for this work that were turned over to you in February 2022.

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.

Response: Objection. This request is overly broad, unduly burdensome and/or unduly invasive of my privacy and is neither relevant to any party's claim or defense nor proportional to the needs of the case; in addition, the burden to me providing the requested discovery substantially outweighs the likely benefit to you of obtaining it, especially when considering the issues at stake in this case. Notwithstanding and without waiving the foregoing objection, Daniel Brassard and Brassard Sugarworks state as follows:

You have the bank records and deposits made as you produced them for one of your inaccurate analyses during mediation.

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.

Response: Objection. This request is overly broad, unduly burdensome and/or unduly invasive of my privacy and is neither relevant to any party's claim or defense nor proportional to the needs of the case; in addition, the burden to me providing the requested discovery substantially outweighs the likely benefit to

you of obtaining it, especially when considering the issues at stake in this case. Notwithstanding and without waiving the foregoing objection, Daniel Brassard and Brassard Sugarworks state as follows:

I was first paid on salary under Thad's order of \$700 weekly that eventually changed to an hourly rate, then to a per bale rate which were all negotiated with Thad Blaisdell and Trini Brassard. As far as checks, you have the bank statements and copies of the checks

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.

Response: Objection. This request is overly broad, unduly burdensome and/or unduly invasive of my privacy and is neither relevant to any party's claim or defense nor proportional to the needs of the case; in addition, the burden to me providing the requested discovery substantially outweighs the likely benefit to you of obtaining it, especially when considering the issues at stake in this case. Notwithstanding and without waiving the foregoing

objections, Daniel Brassard and Brassard Sugarworks state as follows:

However, Ken Blaisdell was active in various activities following his stroke that include operating equipment, discussing equipment replacements and making decisions on purchases, discussing crop rotation plans and making decisions, discussing agriculture requirements such as nutrient management plans and participating in deciding how to meet that requirement, and a variety of other daily tasks. There were no records kept of his daily participation as he was a part of the operation of his farm and not an employee.

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.

Response: Objection. This request is overly broad, unduly burdensome and/or unduly invasive of my privacy and is neither relevant to any party's claim or defense nor proportional to the needs of the case; in addition, the burden to me providing the requested discovery substantially outweighs the likely benefit to

you of obtaining it, especially when considering the issues at stake in this case.

22. Identify the monies you paid to the Decedent between July 2013 and April 2021

to lease various parcels of land owned by him.

Response: Objection. This request is overly broad, unduly burdensome and/or unduly invasive of my privacy and is neither relevant to any party's claim or defense nor proportional to the needs of the case; in addition, the burden to me providing the requested discovery substantially outweighs the likely benefit to you of obtaining it, especially when considering the issue at stake in this case.

23. Identify the monies you paid to the Decedent between July 2013 and April 2021 to use farm equipment owned by him.

Response: Objection. This request is overly broad, unduly burdensome and/or unduly invasive of my privacy and is neither relevant to any party's claim or defense nor proportional to the needs of the case; in addition, the burden to me providing the requested discovery substantially outweighs the likely benefit to

you of obtaining it, especially when considering the issues at stake in this case.

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.

Response: Objection. This request is overly broad, unduly burdensome and/or unduly invasive of my privacy and is neither relevant to any party's claim or defense nor proportional to the needs of the case; in addition, the burden to me providing the requested discovery substantially outweighs the likely benefit to you of obtaining it, especially when considering the issues at stake in this case.

25. Identify the names of all individuals or entities that paid you income for these same employment activities between July 2013 – present.

Response: Objection This request is overly broad, unduly burdensome and/or unduly invasive of my privacy and is neither relevant to any party's claim or defense nor proportional to the needs of the case; in addition, the burden to me providing the

requested discovery substantially outweighs the likely benefit to you of obtaining it, especially when considering the issues at stake in this case.

Requests for Production

1. With respect to each and every response to the foregoing Interrogatories, produce all documents identified in your response.

Response: See above responses.

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.

Response: Objection. This request is overly broad, unduly burdensome and/or unduly invasive of my privacy and is neither relevant to any party's claim or defense nor proportional to the needs of the case; in addition, the burden to me providing the requested discovery substantially outweighs the likely benefit to you of obtaining it, especially when considering the issues at stake in this case.

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.

Response: Objection. This request is overly broad, unduly burdensome and/or unduly invasive of my privacy and is neither relevant to any party's claim or defense nor proportional to the needs of the case; in addition, the burden to me providing the requested discovery substantially outweighs the likely benefit to you of obtaining it, especially when considering the issues at stake in this case.

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.

Response: Objection. This request is overly broad, unduly burdensome and/or unduly invasive of my privacy and is neither relevant to any party's claim or defense nor proportional to the needs of the case; in addition, the burden to me providing the requested discovery substantially outweighs the likely benefit to you of obtaining it, especially when considering the issues at stake

in this case. Notwithstanding and without waving the foregoing objection, Daniel Brassard and Brassard Sugarworks state as follows:

There are none of these items that were purchased.

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.

Response: Objection. This request is overly broad, unduly burdensome and/or unduly invasive of my privacy and is neither relevant to any party's claim or defense nor proportional to the needs of the case; in addition, the burden to me providing the requested discovery substantially outweighs the likely benefit to you of obtaining it, especially when considering the issues at stake in this case. Notwithstanding and without waiving the foregoing objection, Daniel Brassard and Brassard Sugarworks state as follows:

There are none.

6. With respect to any leases, personal, business, or cosigned to, produce a copy of the lease.

Response: Objection. This request is overly broad, unduly burdensome and/or unduly invasive of my privacy and is neither relevant to any party's claim or defense nor proportional to the needs of the case; in addition, the burden to me providing the requested discovery substantially outweighs the likely benefit to you of obtaining it, especially when considering the issue at stake in this case. Notwithstanding and without waiving the foregoing objection, Daniel Brassard and Brassard Sugarworks state as follows:

The leases signed were provided to the Plaintiff at his first meeting in November, 2021.

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).

Response: Objection. This request is overly broad, unduly burdensome and/or unduly invasive of my privacy and is neither relevant to any party's claim or defense nor proportional to the

needs of the case; in addition, the burden to me providing the requested discovery substantially outweighs the likely benefit to you of obtaining it, especially when considering the issues at stake in this case. Again, there are also confidentiality concerns given the “leak” of information to the press prior to Defendants even knowing about filings. They are also requesting information that is after my Grandfather passed and documents that are joint documents with parties that are not part of this case.

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.

Response: Objection. This request is overly broad, unduly burdensome and/or unduly invasive of my privacy and is neither relevant to any party’s claim or defense nor proportional to the needs of the case; in addition, the burden to me providing the requested discovery substantially outweighs the likely benefit to you of obtaining it, especially when considering the issue at stake in this case. In addition, I have a confidentiality concern with any of

my financial documents being shared with Plaintiff given the “leak” to the press of filings prior to them being made.

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.

Response: Objection. This request is overly broad, unduly burdensome and/or unduly invasive of my privacy and is neither relevant to any party's claim or defense nor proportional to the needs of the case; in addition, the burden to me providing the requested discovery substantially outweighs the likely benefit to you of obtaining it, especially when considering the issue at stake in this case. Notwithstanding and without waiving the foregoing objection, Daniel Brassard and Brassard Sugarworks state as follows:

In researching if there is even such a report the Vermont DMV went through a system upgrade and eliminated records prior to 2017. They are also unable to produce a report on this activity without a court order.

10. Produce customer lists for all self-employment activities described above, including the names, addresses, and phone numbers between July 2013 – April 2021.

Response: Objection. This request is overly broad, unduly burdensome and/or unduly invasive of my privacy and is neither relevant to any party's claim or defense nor proportional to the needs of the case; in addition, the burden to me providing the requested discovery substantially outweighs the likely benefit to you of obtaining it, especially when considering the issues at stake in this case. Notwithstanding and without waiving the foregoing objection, Daniel Brassard and Brassard Sugarworks state as follows:

The Plaintiff has a list of customers for the estate available by using the check copies he obtained through the bank.

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

Response: There are no leases other than the documents provided to Plaintiff in November 2021.

12. Produce copies of livestock auction sales between July 2013 – April 2021.

Response: I didn't sell livestock at auction during this time period.

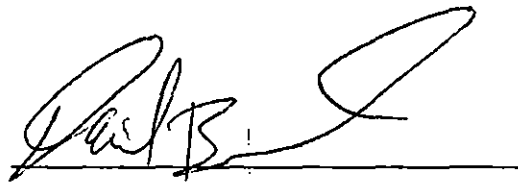
ATTESTATION

(Pursuant to 4 V.S.A. § 27b)

Pursuant to 4 V.S.A. § 27b, I have reviewed the facts set forth in the foregoing responses and hereby state that they are true to the best of my knowledge and belief. I understand that if the foregoing responses are false, I will be subject to the penalty of perjury or to other sanctions in the discretion of the Court.

Dated: 2-28-25

capacity

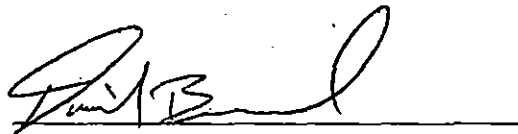


Daniel Brassard, individually and in his
as Manager of Brassard Sugarworks and
Maple Supply, LLC

Objections dated in East Randolph, Vermont this 28th day of February, 2025.

Respectfully submitted,

DANIEL BRASSARD and BRASSARD
SUGARWORKS AND MAPLE SUPPLY,
LLC



capacity

Daniel Brassard, individually and in his
as Manager of Brassard Sugarworks and
Maple Supply, LLC