

EXHIBIT

A

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

**DEFENDANT COURTNEY BRASSARD'S RESPONSES TO PLAINTIFF'S
DISCOVERY REQUESTS SET FORTH IN NOTICE OF DEPOSITION DUCES TECUM**

NOW COMES Defendant, Courtney Brassard., by and through her attorneys, Davis
Steadman Percy & Sluka LLC, and hereby responds to Plaintiff's Discovery Requests as follows:

1. Any personal banking records from July 2013 – April 2021 where funds from Kenneth Blaisdell, Jr. or the Estate of Kenneth H. Blaisdell, Jr. were deposited.

ANSWER: Objection overly broad and burdensome nor is the request relevant or likely to lead to relevant information not already in the possession of the Plaintiff. Notwithstanding the objection Plaintiff has copies of all check written to me from the above stated accounts and in fact provided me with the same along with an Excel Spreadsheet. See attached spreadsheet and copies of checks. Comments on the intent/purpose of each check is provided on the Excel spreadsheet by me.

2. College transcripts for any associate degree or bachelor's degree program entered into by yourself between 2010 – 2014

ANSWER: Objection not relevant or likely to lead to the discovery of relevant information. Notwithstanding the objection, I do not have an associate or bachelor's degree and was never in such a program. I took three classes at CCV that were prerequisites to my admission into an associates degree program. I have taken no other college courses.

3. Tax returns from 2013 – 2021

ANSWER: Objection, not relevant, not likely to lead to the discovery of relevant information.

4. Any receipt which you assert supports your claims that you improved the Astro Commodore trailer.

ANSWER: Previously disclosed to Plaintiff at mediation. Subsequent to mediation these documents were stolen, and I no longer possess or have means to obtain additional copies at the present time. A report of the theft was filed with the Randolph Police Department.

5. Checks from Kenneth H. Blaisdell, Jr.'s accounts that were deposited by you into any banking account owned by you during 2013 – 2021.

ANSWER: See response to #1 above. I do not retain copies of these checks when received. The attached copies were provided to me by Plaintiff. Plaintiff has all of these checks and has produced a spreadsheet listing the same.

6. Copies of any W.B. Rogers gravel checks received by you between 2014 – present.

ANSWER: One check was received and upon information and belief Plaintiff already possesses the same.

7. Any communications between you, Brian Falzo, and/or W.B. Rogers related to gravel operations at Kenneth H. Blaisdell, Jr.'s land (transferred to you and Brian Falzo by Trini Brassard).

ANSWER: Plaintiff already possesses copies of all communication of which I am aware.

8. Any other document or photo in your possession which relates to your claimed inheritance from the Estate of Kenneth H. Blaisdell, Jr.

ANSWER: Objection, overly broad and burdensome. As I have been decreed a portion personal property of the estate and a residual beneficiary this would include any and all photographs taken during my infancy through the death of my grandfather. There is no relevant document or photograph that I am aware of that is not in the possession of the Plaintiff, which includes but is not limited to deeds, appraisals, appraisals of personal property and photographs of the same, copies of bank account statements of my grandfather, etc.

Dated at _____, Vermont this _____ day of March 2025.

Courtney Brassard

Subscribed and sworn before me:

Notary Public
My commission expires:

AS TO OBJECTIONS:

Todd C. Steadman, Esq.
Attorney for Courtney Brassard

Courtney Brassard				
Check No.	Date of Payment	Date Processed	Payee	Amount
2158	12/18/2013	1/6/2014	Courtney Brassard	200.00
2235	2/21/2014	2/26/2014	Courtney Brassard	100.00
5210	4/27/2015	4/29/2015	Courtney Brassard	600.00
5212	5/4/2015	5/6/2015	Courtney Brassard	1,000.00
5223	6/2/2015	6/5/2015	Courtney Brassard	1,200.00
5240	7/5/2015	7/7/2015	Courtney Brassard	1,200.00
5279	11/27/2015	12/3/2015	Courtney Brassard	200.00
5378	12/25/2016	1/9/2017	Courtney Brassard	200.00
5388	1/24/2017	3/7/2017	Courtney Brassard	100.00
				4,800.00

CHRISTMAS
BIRTHDAY

UNEMPLOYED TO
PROVIDE CARE

CHRISTMAS
CHRISTMAS
BIRTHDAY

KENNETH H. BLASDELL
 211 RD 70 BOX 1
 EAST RANDOLPH VT 05401

2150

01/06/13

For Cash Two hundred dollars \$200.00

RANDOLPH NATIONAL BANK
 RANDOLPH, VERMONT

For John Brassard

⑆011601171⑆ ⑆0⑆401⑆ 2150

Ck# 2158 Date 01/06/14 Amt \$200.00

KENNETH H. BLASDELL
 211 RD 70 BOX 1
 EAST RANDOLPH VT 05401

2235

02/26/14

For Cash One hundred dollars \$100.00

RANDOLPH NATIONAL BANK
 RANDOLPH, VERMONT

For John Brassard

⑆011601171⑆ ⑆0⑆401⑆ 2235

Ck# 2235 Date 02/26/14 Amt \$100.00

KENNETH H. BLASDELL
 211 RD 70 BOX 1
 EAST RANDOLPH VT 05401

5210

04/29/15

For Cash Six hundred dollars \$600.00

RANDOLPH NATIONAL BANK
 RANDOLPH, VERMONT

For John Brassard, Atty

⑆211770200⑆ ⑆0403⑆ 5210

Ck# 5210 Date 04/29/15 Amt \$600.00

KENNETH H. BLASDELL
 211 RD 70 BOX 1
 EAST RANDOLPH VT 05401

5212

05/06/15

For Cash One thousand dollars \$1,000.00

RANDOLPH NATIONAL BANK
 RANDOLPH, VERMONT

For John Brassard, Atty

⑆211770200⑆ ⑆0403⑆ 5212

Ck# 5212 Date 05/06/15 Amt \$1,000.00

KENNETH H. BLASDELL
 211 RD 70 BOX 1
 EAST RANDOLPH VT 05401

5223

06/05/15

For Cash Twelve hundred dollars \$1,200.00

RANDOLPH NATIONAL BANK
 RANDOLPH, VERMONT

For John Brassard, Atty

⑆211770200⑆ ⑆0403⑆ 5223

Ck# 5223 Date 06/05/15 Amt \$1,200.00

MARSHALL H. BRASSARD
 200 W. 1st Street, Suite 100
 Portland, ME 04101
 Phone: 603-775-1001

5240
 No. 125115
 \$1,200.00
 Two hundred dollars
 LANCE BRASSARD
 JUNE BRASSARD, JR.
 6040315 5240

Ck# 5240 Date 07/07/15 Amt \$1,200.00

MARSHALL H. BRASSARD
 200 W. 1st Street, Suite 100
 Portland, ME 04101
 Phone: 603-775-1001

5279
 No. 1122115
 \$200.00
 Two hundred dollars
 LANCE BRASSARD
 JUNE BRASSARD, JR.
 6040315 5279

Ck# 5279 Date 12/03/15 Amt \$200.00

MARSHALL H. BRASSARD
 200 W. 1st Street, Suite 100
 Portland, ME 04101
 Phone: 603-775-1001

5378
 No. 125115
 \$200.00
 Two hundred dollars
 LANCE BRASSARD
 JUNE BRASSARD, JR.
 6040315 5378

Ck# 5378 Date 01/09/17 Amt \$200.00

MARSHALL H. BRASSARD
 200 W. 1st Street, Suite 100
 Portland, ME 04101
 Phone: 603-775-1001

5388
 No. 125115
 \$100.00
 One hundred dollars
 LANCE BRASSARD
 JUNE BRASSARD, JR.
 6040315 5388

Ck# 5388 Date 03/07/17 Amt \$100.00