

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.)
)
v.)
)
TRINI BRASSARD,)
COURTNEY BRASSARD, BRIAN FALZO,)
DANIEL BRASSARD, AND)
BRASSARD SUGARWORKS)
AND MAPLE SUPPLY, LLC)

NOTICE OF DEPOSITION DUCES TECUM

Pursuant to V.R.C.P. 30, you are hereby notified that JOHN DURKEE, EXECUTOR OF THE ESTATE OF DECEDENT KENNETH BLAISDELL, JR. by and through their attorneys, Primmer Piper Eggleston and Cramer PC, will take the deposition upon oral examination of **Courtney Brassard** on **Thursday August 8, 2024** beginning at **10:00 a.m. EST** at 43 Lincoln Corners Way, Suite 205, Woodstock, Vermont, 05091, before an officer authorized to administer oaths. Said deposition may be video-recorded and will continue pursuant to rule and agreement until completed. You are invited to attend and examine.

DUCES TECUM

Ms. Brassard is hereby instructed to produce by **Thursday, August 1, 2024** at 5:00 p.m. to Primmer Piper Eggleston and Cramer, PC, via either physical production (to Primmer Piper Eggleston and Cramer PC, 43 Lincoln Corners Way, Suite 205, Woodstock, Vermont, 05091) or electronic means (to ewillhite@primmer.com, and rwindish@primmer.com) for copying and examination under oath:

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.
2. College transcripts for any associates degree or bachelor's degree program entered into by yourself between 2010 – 2014
3. Tax returns from 2013 – 2021
4. Any receipt which you assert supports your claims that you improved the Astro Commodore trailer
5. Checks from Kenneth H. Blaisdell, Jr.'s accounts that were deposited by you into any banking account owned by you during 2013 – 2021.
6. Copies of any W.B. Rogers gravel checks received by you between 2014 – present.
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).
8. Any other document or photo in your possession which relates to your claimed inheritance from the Estate of Kenneth H. Blaisdell, Jr.

DATED at Woodstock, Vermont, this 7th day of June, 2024.

PRIMMER PIPER EGGLESTON & CRAMER PC

By: /s/ Elizabeth Willhite
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***Attorneys for John Durkee, Executor of the Estate
of Kenneth H. Blaisdell, Jr.***