

Daniel Brassard's

Response to court ordered document production and

Request to be filed under seal

Case #23-CV-02848

Court Order filed on 8/25/2025 item #2

"Additional banking records identified in Plaintiff's interrogatory #2, which should at a minimum include Defendants records related to Brassard Self Storage, LLC and deposited checks or deposit slips for Brassard Sugarworks and Maple Supply, LLC."

In response to the court order, production of Brassard Self Storage LLC statements and deposit slips. This information wasn't included as missing in the plaintiff's letter dated July 11, 2025. It wasn't until after I produced the documents requested for Brassard Sugarworks and Maple Supply LLC that the plaintiff then brought up Brassard Self Storage LLC. Below in bold is the portion about missing discovery that was in the letter received on July 11, 2025 from Elizabeth Wilhite.

**"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."**

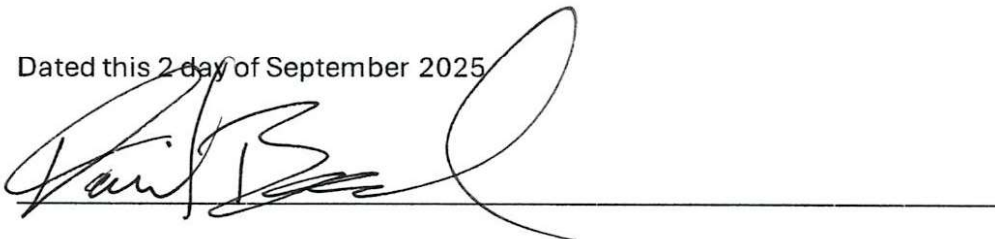
It wasn't until August 14, 2025 that Brassard Self Storage LLC was brought into any request for documents. For the record, discovery closed in April 2025 therefore this request shouldn't be allowed however I have zero to hide so I'm producing the documents. Deposit slips are provided, and you will see the high check count making it burdensome to produce every check. For reference, tenants pay monthly, quarterly or yearly. Rent at the

time was \$50, \$70, \$110. You will see some checks deposited in various multiples of these rates.

**Also attached here are the missing deposit slips and checks for Brassard Sugarworks that I ask be filed under seal due to the volume of checks that belong to customers that are not related to the case that include account numbers and other information.**

This information was requested of the bank in the prior requests. In a meeting at the bank they discovered they were not being found on their side and we were able to resolve the issue. This was not an issue of my making.

Dated this 2 day of September 2025

A handwritten signature in black ink, appearing to read "Paul B.", is written over a solid horizontal line. The signature is stylized with a large, looping flourish at the end.