



MURPHY
SULLIVAN
KRONK

Via U.S. Mail

December 22, 2015

Elizabeth M. Demas, Esq.
Clarke Demas & Baker
346 Shelburne Road, Suite 203
P.O. Box 4484
Burlington, VT 05406-4484

Re: Brianne E. Chase v. Town of Underhill

Dear Beth:

I am writing with respect to your client's responses to the Town's first set of discovery requests. Certain responses were less than complete and the Town requests more complete responses.

Interrogatory No. 3. Please identify by date the Selectboard meetings referenced in the response.

Interrogatory No. 10. Please identify the type of vehicle used to access the property, e.g. car, snowmobile, four-wheeler, etc., or whether Plaintiff traveled by foot. Please state how often such access was made. If access was made for purposes other than recreational purposes, please identify all other purposes for which the Repa Trail was used to access the property.

Interrogatory 14. Does Plaintiff contend that it does not hold the same right to use Goodrich Road that it holds to use Repa Trail? Does Plaintiff contend that it would be impossible to make Goodrich Road passable?

Interrogatory 17. When was the farmhouse last inhabited?

Interrogatory 18. Please provide a list of all persons with whom Plaintiff or its agents have discussed the farmstead's occupation and use.

Interrogatory No. 20. Please identify by date the Selectboard meetings referenced in the response.

Interrogatory No. 21. Please identify by date the Town meeting referenced in the response.

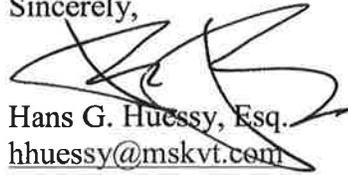
Interrogatory No. 22. Please identify by date the Selectboard meetings referenced in the response.

Interrogatory 23. Does Plaintiff have any knowledge of its predecessors in titles' means of accessing the property and the purposes for which its predecessors in title so accessed the property? If so, please provide a detailed explanation. With respect to Plaintiff's use of Repa Road and/or Trail to access the property, please provide as much detail as possible as to the frequency with which the road and/or trail were used to access the property and the primary purpose of said access.

Interrogatory 24. Does Plaintiff contend that Goodrich Road cannot be made physically passable?

I look forward to your responses.

Sincerely,

A handwritten signature in black ink, appearing to read 'H. Huessy', is written over the typed name and email address.

Hans G. Huessy, Esq.
hhuessy@mskvt.com

Enclosures

cc: Town of Underhill