

# EXHIBIT C

**VERMONT SUPERIOR COURT**

Rutland Unit  
83 Center St  
Rutland, VT 05701  
802-775-0114  
www.vermontjudiciary.org



**PROBATE DIVISION**

Case No. 22-PR-02895

**Estate of: John Abner Mead (date of death 1/12/1920)**

**ENTRY REGARDING MOTION**

Title: Petition to Open an Estate and Appoint Fiduciary (Motion: 1)  
Filer: James Lamb Hinsman  
Filed Date: May 10, 2022

The motion is GRANTED.

A hearing was held on the petition brought by an heir of the decedent to re-open the estate and appoint a special administrator for the purposes of investigating and presenting potential claims against Middlebury College for an alleged breach of the terms of a conveyance made by the decedent while he was still alive. This does not involve a bequest of the estate.

The estate was opened in 1920 and the will allowed following testimony of witnesses. The Estate was administered and the assets known at that time were distributed as part of the distribution and the estate was closed in 1921.

Petitioners now believe that there is a potential claim to be made against Middlebury College for breach of an agreement between the decedent and the college as part of his donation of the chapel building to the college. Without passing judgment on the validity of any claims (which would not be under the jurisdiction of this court), the Court will re-open the estate of John Abner Mead and appoint Hon. James H. Douglas to serve as a special administrator to research and present any potential claims against the college and settle or prosecute those claims within his discretion.

Electronically signed on June 17, 2022 pursuant to V.R.E.F. 9(d)

A handwritten signature in black ink, appearing to read "K. C. Anderson", written over a horizontal line.

Karl C. Anderson  
Probate Judge

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**PROBATE DIVISION**

Case No. 22-PR-02895

Estate of: John Mead

**LETTERS OF SPECIAL ADMINISTRATION**

TO: Hon. James H. Douglas

**Name:**

Hon. James H. Douglas

**Address:**

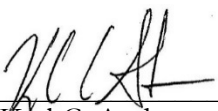
109 South Munger Street, Middlebury, VT 05753

This Court appoints you as special administrator of this estate.

**Limited purpose.**

You are granted full authority to collect and take charge of the following estate of the deceased for the following purpose: To represent the estate for the purpose of presenting and possibly prosecuting potential legal claims of the Decedent for breach of contract and/or for breach of the conditions of the conditional gift of the Mead Chapel to Middlebury College.

Electronically signed on June 17, 2022 pursuant to V.R.E.F. 9(d)

  
Karl C. Anderson  
Probate Judge

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PROBATE DIVISION  
Case No. 22-PR-02895

Estate of: John Mead

### **CERTIFICATE OF APPOINTMENT OF FIDUCIARY**

I hereby certify that on June 20, 2022, Hon. James H. Douglas of Middlebury, Vermont was appointed by the Court to serve as the Special Administrator for a Limited Purpose for this proceeding and has accepted the responsibilities and trust related to this position.

Based on the Court's records, I certify that the appointment has never been revoked and remains in full force and effect.

Electronically signed: 6/20/2022 12:25 PM pursuant to V.R.E.F. 9(d)

A handwritten signature in cursive script, reading "Matthew J. Weir".

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Probate Register  
Rutland Probate Division