

# EXHIBIT EE

STATE OF VERMONT

SUPERIOR COURT  
Addison Unit

CIVIL DIVISION  
Case No. 23-CV-01214

HON. JAMES H. DOUGLAS,	)
Special Administrator of the	)
Estate of John Abner Mead,	)
	)
<i>Plaintiff,</i>	)
v.	)
	)
THE PRESIDENT AND FELLOWS	)
OF MIDDLEBURY COLLEGE,	)
	)
<i>Defendant.</i>	)

**PLAINTIFF’S ANSWERS TO MIDDLEBURY COLLEGE’S  
FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION**

Plaintiff Hon. James H. Douglas, Special Administrator of the Estate of John Abner Mead, submits the following Answers to Defendant’s First Set of Interrogatories and Requests for Production:

**OBJECTIONS TO DEFINITIONS**

**“You and Your”**. The terms “you,” and “your” shall mean James H. Douglas and his agents, employees, affiliates, attorneys, and any person or entity acting on his behalf or under his control.

**Objection: James H. Douglas is not a party to this action. Therefore, the terms “you” and “your” will be understood to refer to James H. Douglas, Special Administrator of the Estate of John Abner Mead and not to James H. Douglas the individual.**

3. Identify each document that you contend sets forth or reflects a condition subsequent to the Mead Gift requiring Middlebury College to maintain the name “Mead Memorial Chapel” on the Chapel in perpetuity.

**ANSWER: Objection to the use of and definition of “Mead Gift.” Mead did not gift funds to pay for the construction of a chapel on the campus of Middlebury College. He erected a chapel, the same to be known as the “Mead Memorial Chapel.”**

**Without waiving such objection, see Exhibits to the Complaint: Ex. 1-001 thru 1-012, Ex. 2-001 thru 2-031, Ex. 3-011 thru 3-016, Ex. 3-021, Ex. 3-034, Ex. 4-003 thru 4-010, Ex. 4-021, Ex. 4-027, and Ex. 8-003 (photos of Family Bible and Mead Memorial Chapel Sign).**

**Plaintiff will supplement his Answer after receipt of Defendant’s Discovery Responses.**

4. Describe in detail the basis for your allegation in paragraph 127 of the Complaint that the “final cost paid by [John Abner] Mead to construct the Chapel was \$75,373.34,” including for each constituent expense included in that calculation: (a) the amount of the expense, (b) the purpose of the expense, (c) the date(s) upon which the expense was paid or incurred, and (d) identification of the documents reflecting the expense.

**ANSWER: See Exhibit 3-001 thru 3-004, 3-008 thru 3-009, 3-011 thru 3-019, 3-021, 3-026 thru 3-034, 3-044 thru 3-052. Plaintiff will supplement his Answer after receipt of Defendant’s Discovery Responses.**

5. Identify and describe all communications, whether oral or in writing, between you and the Vermont Attorney General’s Office relating to the Mead Gift, the Gift Letter, the Chapel, or Middlebury’s removal of the name “Mead” from the

Chapel. For each such communication, describe the form and content of the communication, state when it occurred, and identify any witnesses to the communication.

**ANSWER: Objection to the use of and definition of “Mead Gift.” Mead did not gift funds to pay for the construction of a chapel on the campus of Middlebury College. He erected a chapel, the same to be known as the “Mead Memorial Chapel.”**

**Objection to the use and definition of “Gift Letter.” Mead’s May 11, 1914 letter did not describe a potential gift of funds for the construction of a chapel, it offered to erect a chapel, the same to be known as the “Mead Memorial Chapel.”**

**Without waiving such objections, none.**

6. Identify and describe each category of damages you are claiming in this matter, and for each such category of damages: (a) provide a computation of the damages claimed, fully illustrating how you have calculated them and (b) identify each document supporting the claimed damages.

**ANSWER: To be determined. Plaintiff will supplement his Answer according to the case scheduling order.**

7. Identify all witnesses you may call at trial in this matter.

**ANSWER: To be determined. Presently, Plaintiff may call the following witnesses at trial: George Lee, Laurie Patton, Jeff Cason, Nicole Curvin, Miguel Hernandez, Colleen Fitzpatrick, David Gibson, Janine Hetherington, Rebeka Irwin, Roni Lezama, Joyce Mao, David Provost, Hannah Ross.**

8. List each person whom you expect to call as an expert witness at trial.

For each expert, state:

- a. the expert’s name, address, and telephone number;
- b. the subject matter on which the expert is expected to testify;

was \$75,373.34.”

**ANSWER: See Exhibits to the Complaint as indicated supra.**

7. Produce copies of all communications between you and the Vermont Attorney General’s Office relating to the Mead Gift, the Gift Letter, the Chapel, or Middlebury’s removal of the name “Mead” from the Chapel.

**ANSWER: Objection to the use of and definition of “Mead Gift.” Mead did not gift funds to pay for the construction of a chapel on the campus of Middlebury College. He erected a chapel, the same to be known as the “Mead Memorial Chapel.”**

**Objection to the use and definition of “Gift Letter.” Mead’s May 11, 1914 letter did not describe a potential gift of funds for the construction of a chapel, it offered to erect a chapel, the same to be known as the “Mead Memorial Chapel.”**

**Without waiving such objections, none.**

8. Produce all documents supporting your claim for damages in this matter.

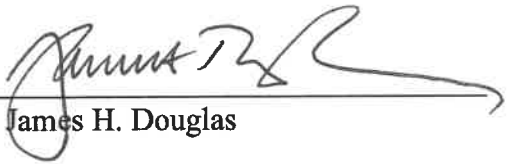
**ANSWER: To be determined. Plaintiff will supplement his Answer according to the case scheduling order.**

9. Produce a copy of the current curriculum vitae of each expert witness you have identified in response to these discovery requests or that you disclose in discovery.

**ANSWER: To be determined. Plaintiff will supplement his Answer according to the case scheduling order.**

10. Produce a copy of the complete file of any expert witness you have identified in response to these discovery requests or that you disclose in discovery. With respect to any communications to or from the expert in the expert’s file, produce

DATED at Middlebury, County of Addison and State of Vermont, this 14<sup>th</sup> day of November 2023.

By:   
James H. Douglas

STATE OF VERMONT  
COUNTY OF ADDISON, ss.

At Middlebury, in said County this 14<sup>th</sup> day of November 2023, James H. Douglas personally appeared and made oath to the truth of the statements set forth herein.

Before me,   
Notary Public 11/31/25

My Commission Expires:

January 31, 2025