

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,)
 Plaintiff)
 v.)
 President and Fellows of Middlebury)
 College)
 Defendant)

PLAINTIFF’S EXHIBIT LIST
SUMMARY JUDGMENT & MOTION TO DISMISS

Ex. #	Exhibit	Date	
1	Mead’s <i>Letter of Offer – of the “Mead Memorial Chapel”</i>	5/11/1914	
2	Letter: Thomas to Trustees w/ JAM’s <i>Letter of Offer</i> and requesting immediate responses	5/15/1914	
3	Letters from Trustees to Thomas	May/Jun 1914	
4	MC Board Minutes: Accept the “Mead Memorial Chapel”	6/22/1914	
5	MC Board Meeting Minutes – Resolved to go forward with construction - \$60,000 by Mead & bal. by College	12/18/1914	
6	Acceptance Letter: JAM to Trustees – Mead agrees to pay \$60,000 if the College agrees to complete the chapel	1/13/1915	
7	Letter: Thomas to Vermont Marble Co. re quote for change to plans requested by Mrs. Mead re pilasters and windows.	2/22/1915	
8	Letter: Thomas Rogers to Thomas Quote for change	2/24/1915	
9	Offer Memorandum: JAM to Trustees – Mead offer to pay additional 1,031, if Trustees install \$5,000 pipe organ	2/27/1915	
10	Letter: Thomas to Partridge re \$1,031 approval	3/1/1915	
11	Letter: Thomas to Rogers - Authorizing \$1,031 changes	3/1/1915	

12	MC Board Meeting Minutes- Acceptance of Mead's offer to add \$1,031 and College will buy \$5,000 pipe organ	4/14/1915	
13	News Article: Barre Daily Times - Fine Organ Ordered	August 1915	
14	Mead Memorial Chapel - Architectural Plans – Mead No. 4 – East Elevation (Front of Chapel)	3/31/1915	
15	Mead Memorial Chapel - Architectural Plans – Mead No. 19 – Main Entrance Doors under Portico	3/31/1915	
16	Mead Memorial Chapel - Architectural Plans – Misc. 1	3/31/1915	
17	Mead Memorial Chapel - Architectural Plans – Misc. 2	3/31/1915	
18	Letter: JAM to Thomas – Offer to add Chime of Bells to the Mead Memorial Chapel	6/21/1915	
19	MC Board Meeting Minutes - Gratefully accepting Bells	6/23/1915	
20	News Articles: Middlebury Register - Chime of Bells	1915	
21	News Article: Middlebury Register - “Bells Delight Many”	1/7/1916	
22	Letters/invoice re Chime of Bells - \$6,960, pd by Mead	Dec. 1915	
23	Photos of the Chime of Bells – present day	2024	
24	Letter: Thomas to JAM – Cornerstone Box and sod	5/27/1914	
25	Program: “Breaking Ground for the Mead Memorial Chapel & Presentation of Corner Stone”	6/23/1914	
26	Photos – Ground Breaking & Cornerstone Ceremony	6/23/1914	
27	Speech: “Breaking Ground and Presentation of Corner Stone” by Ex-Governor John A. Mead, ‘64	6/23/1914	
28	Speech: “Acceptance in Behalf of the Trustees” by Rev. James L. Barton, D.D., LL.D., ‘81	6/23/1914	
29	Speech: “Address in Behalf of the Faculty” by Prof. Wright	6/23/1914	
30	News Articles - <i>Groundbreaking & Cornerstone Ceremony</i>	June 1914	
31	News Article: Boston Transcript Article on MMC	4/8/1915	

32	New Articles – Announcing <i>Dedication Ceremony</i>	June 1916	
33	Mead’s Speech – Dedication & Presentation of Keys	6/18/1916	
34	Ezra Brainerd’s Acceptance Speech obo the Turstees	6/18/1916	
35	New Articles – Reporting on <i>Dedication Ceremony</i>	June 1916	
36	1916 - Kaleidoscope dedicated to Mead	1916	
37	Correspondence re architects, plans, specs, construction, costs, contractors, contracts, building committee	1914-17	
38	Mead Memorial Chapel Booklet – correspondence between Thomas, Mead, & Mrs. Mead	11/14/1916 to 12/13/1916	
39	The Hymnal of Praise inscribed “Mead Memorial Chapel”	Sept. 1916	
40	Mead’s additional agreement to pay for Hymn Boards	Dec. 1916	
41	Mead’s gift of \$1,000 to the College Endowment	June 1918	
42	Board Meeting Minutes making tribute to Mead.	1920	
43	Letter - Thomas to Carl B. Hinsman re completing the west end of the Chapel with marble	6/14/1920	
44	Letter – Carl B. Hinsman to Pres. Moody re repairs to spire, and expressing strong desire that it be restored	4/29/1931	
45	Letter - Pres. Moody to Carl B. Hinsman – matter settled, proceeding with the repairs to the spire.	5/8/1931	
46	Letter –Moody to Mrs. Carl Hinsman - asking for consent to add the galleries as balcony seating	7/20/1937	
47	Ordering re-inscription of 7 of the original 11 bells which were recast in 1985, with Mead’s gift and verse	4/2/1985	
48	Photos of MMC and sign before & after removal. Photo of the original Mead Family Bible	2021 2021	
49	The Community House Report and Financial Statement	1919-20	
50	“Pearsons Hall”	1908-10	
51	“McCullough Gymnasium”	1910	

52	“Hepburn Dormitory”	1915	
53	“Gifford Memorial Hall for Boys”	1939	
54	Board Acceptance of Gifford Memorial Hall	1940	
55	Map and index of Middlebury Campus Buildings	2017	
56	Mead Family Tree filed with Probate Division	6/12/2022	