

BAR HARBOR BANK & TRUST,
Successor in Interest by Merger to
Lake Sunapee Bank, fsb,
Plaintiff,

- vs. -

VERMONT COUNTRY CORP., *et al.*
Defendants.

PLAINTIFF'S RESPONSE TO
DEFENDANTS' FILING
OF OCTOBER 19, 2018

In any event, further delay of the proceedings is unwarranted. Repayment of the note has been in default for more than a year. The principal due on the note is \$218,160.01, with \$34.14 per diem interest accruing (exclusive of costs and fees relative to the foreclosure). Defendant offers no support for her contention that “funds will become available to purchase back the property.” Even if she could provide some evidence that she could repay some amount, the redemption period should be set at 30 days, pursuant to 12 V.S.A. § 4946(c).

¹ The Court has already ruled that Defendant Battaglia may not file documents on behalf of Vermont Country Corporation (VCC).

DATED at Rutland, Vermont, this 24th day of October, 2018.

BAR HARBOR BANK & TRUST,
Successor in Interest by Merger to
Lake Sunapee Bank, fsb

By: /s/ Elizabeth A. Glynn
Elizabeth A. Glynn, Esq.
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Ryan Smith & Carbine, Ltd.
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Its Attorney
802-786-1065

8913-124/865452

STATE OF VERMONT

SUPERIOR COURT
Windsor Unit

CIVIL DIVISION
Docket No. 142-4-18 Wrcv

BAR HARBOR BANK & TRUST,
Successor in Interest by Merger to
Lake Sunapee Bank, fsb,
Plaintiff

CERTIFICATE OF SERVICE

vs.

VERMONT COUNTRY CORPORATION;
MARJORIE M. BATTAGLIA;
MARK A. BENETATOS;
AND ALL UNNAMED OCCUPANTS OF
3699 WOODSTOCK ROAD,
WHITE RIVER JUNCTION (HARTFORD), VERMONT,
Defendants

I, Elizabeth A. Glynn, Esq., hereby certify that I served *a copy of Plaintiff's Response to Defendants' Filing of October 19, 2018 and Certificate of Service*, to all other parties to this case as follows:

Jeffrey P. White, Esq.
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Marjorie M. Battaglia
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White River Jct., VT 05001
Defendant

Via:

- ☒ First Class Mail by depositing it in the US
Mail;
- ☐ By personal delivery to _____ or
his/her counsel;
- ☒ Other. Explain: EMAIL

DATED at Rutland Vermont this 24th day of October, 2018.

BY: /s/ Elizabeth A. Glynn
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