

**STATE OF VERMONT
SUPREME COURT**

Hon. James H. Douglas,)	Docket No. 25-AP-148
Special Administrator of the)	
Estate of John Abner Mead,)	
<i>Plaintiff/Appellant</i>)	
v.)	
)	
The President and Fellows of)	
Middlebury College)	
<i>Defendant/Appellee</i>)	

MOTION FOR LEAVE TO FILE
A CORRECTION TO APPELLANT'S PRINCIPAL BRIEF

NOW COMES Counsel for Plaintiff/Appellant, who hereby requests leave to file a corrected version of Appellant's Principal Brief to ensure that a paragraph on page 24 which contains 2 erroneous caselaw citations can be corrected so as not to mislead or create confusion with the erroneous citations.

Submitted with this motion is a redline-strikeout version of the Brief which contains the corrections on page 24 as well as corresponding corrections to the Table of Authorities. In addition, a clean copy of the corrected Brief with the changes accepted, is being submitted to replace the Brief containing the errors.

Undersigned counsel was unaware of the erroneous content and apologizes for any inconvenience to the parties and to the Court and would greatly appreciate permission to correct the record. The error was unknown and the correction is being pursued in good faith.

WHEREFORE Appellant's counsel respectfully requests permission to submit a corrected Principal Brief.

DATED at Randolph, Vermont, this 2nd day of January, 2026.

**The Honorable James H. Douglas, Special
Administrator of the Estate of John Abner
Mead,**

Plaintiff/Appellant

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