

THE STATE OF NEW HAMPSHIRE

**IN THE MERRIMACK
SUPERIOR COURT**

**ORIGINALLY DOCKETED IN
THE ROCKINGHAM
SUPERIOR COURT AS CASE
NOS. 90-1370, 1371, 1372**

PAMELA SMART,

Petitioner,

v.

STATE OF NEW HAMPSHIRE,

Respondent.

2026 JAN -9 A 9:31
MERRIMACK SUPERIOR COURT

MOTION TO ADMIT COUNSEL *PRO HAC VICE*

Joseph Prieto, a member in good standing of the New Hampshire Bar, respectfully moves that Attorney Matthew Zernhelt of the law firm Zernhelt Law LLC, be permitted to practice before this Court in the above-referenced action. In support of this motion, Petitioner states as follows:

1. The undersigned is a member of the New Hampshire Bar in good standing and at all times shall be actively associated with Attorney Matthew Zernhelt of the law firm Zernhelt Law, LLC, in this action.
2. Mr. Zernhelt's verified application in accordance with Superior Court Rule 19 and New Hampshire Rule of Criminal Procedure Rule 42 is attached hereto as Exhibit A.
3. Petitioner requests that Mr. Zernhelt be permitted to appear, along with local counsel, in this matter.

WHEREFORE, Petitioner respectfully requests that this Court enter an order:

- (i) Permitting Matthew Zernhelt to practice before this Court in this action; and
- (ii) Grant such further relief as the Court deems just and appropriate.

Date: January 5, 2026

Respectfully submitted,

Pamela Smart

By Attorney,

JOSEPH PRIETO, ESQ.

/s/ Joseph Prieto, Esq. 

Joseph Prieto, Esq.

(NH Bar no. 15040)

PrietoLaw

68 Sagamore Street

Manchester, NH 03104

(603) 232-2085

joe@prietolaw.com

CERTIFICATE OF SERVICE

I hereby certify on this 5th day of January, 2026, a copy of the foregoing documents was served via electronic service through the Court's electronic filing system to the Office of the Attorney General of New Hampshire.

/s/ Joseph Prieto, Esq. 

Joseph Prieto, Esq.

**EXHIBIT A –
Application of
Matthew Zernhelt**

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PAMELA SMART,

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STATE OF NEW HAMPSHIRE,

Respondent.

VERIFIED APPLICATION TO ADMIT COUNSEL PRO HAC VICE

Attorney Matthew Zernhelt hereby applies to practice before this Court in the instant action pursuant to Superior Court Rule 19 and in support thereof says:

1. I reside at [REDACTED]. My business address is 100 West Road, Suite 204, Towson, MD 21204.
2. I seek to represent Pamela Smart ("Petitioner") in the above-captioned matter. Petitioner is incarcerated at Bedford Hills Correctional Facility, located at 247 Harris Rd., Bedford Hills, New York, 10507, by order of the Rockingham County Superior Court and the New Hampshire Department of Corrections. As such, she does not have a phone number.
3. I am a member in good standing of the bars of the following courts:

Court

Supreme Court of the United States
United States Court of Appeals for the Fourth Circuit
United States District Court for the District of Maryland
State of Maryland

Period of Admission

October 10, 2017, to present
November 14, 2023, to present
May 15, 2015, to present
December 13, 2012, to present


4. I have never been denied admission *pro hac vice* in this State and have never had my *pro hac vice* admission revoked in this State. I have not otherwise been formally disciplined or sanctioned by any court in this State.
5. No formal, written disciplinary proceeding has ever been brought against me by any disciplinary authority within the last five years.
6. I have never been held in contempt or otherwise sanctioned by any court in written order in the last five years for disobedience of its rules or orders.
7. In the preceding two years, I have not filed an application to appear *pro hac vice* in New Hampshire.
8. The following counsel will serve as local counsel in this matter and will be associated with me and will be present at any trial or hearing:

Joseph Prieto, Esq.
(NH Bar no. 15040)
PrietoLaw
68 Sagamore Street
Manchester, NH 03104
(603) 232-2085
joe@prietolaw.com

WHEREFORE, Matthew Zernhelt respectfully requests that this Honorable Court:

- A. Permit Matthew Zernhelt to practice before this Court in this action on behalf of Petitioner; and
- B. Grant such other relief the Court deems just and proper.

Respectfully submitted,


Matthew Zernhelt
Zernhelt Law LLC
100 West Road, Suite 204

Towson, MD 21204
(443) 690-0870
mz@zernheltlaw.com

VERIFICATION

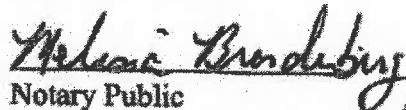
I, Matthew Zernhelt, verify and affirm under oath that the facts stated in this Verified Application to Admit Counsel *Pro Hac Vice* are true and correct to the best of my knowledge and belief.


Matthew Zernhelt

Matthew Zernhelt personally appeared before me, Melissa Brandenburg, a notary public in Baltimore County in the State of Maryland, and Matthew Zernhelt says he has read the foregoing Verified Application to Admit Counsel *Pro Hac Vice* and is informed and believes the facts stated therein are true and correct.

Subscribed and sworn before me on this 4th day of January 2026

NOTARY PUBLIC
STATE OF MARYLAND
Baltimore County
MELISSA A BRANDENBURG


Notary Public
My commission expires: 5/12/29

My Commission Expires 5/12/29

Supreme Court of Maryland

Annapolis, MD



CERTIFICATE OF GOOD STANDING

STATE OF MARYLAND, ss:

I, Gregory Hilton, Clerk of the Supreme Court of Maryland, do hereby certify that on the thirteenth day of December, 2012,

Matthew Chapin Zernhelt

having first taken and subscribed the oath prescribed by the Constitution and Laws of this State, was admitted as an attorney of said Court, is now in good standing, and as such is entitled to practice law in any of the Courts of said State, subject to the Rules of Court. This certificate of good standing is valid through the fifth day of March, 2026.



In Testimony Whereof, I have hereunto set my hand as Clerk, and affixed the Seal of the Supreme Court of Maryland, this fourth day of January, 2026.

Gregory Hilton

Clerk of the Supreme Court of Maryland