

HILLSBOROUGH, SS.
Northern District

THE STATE OF NEW HAMPSHIRE

SUPERIOR COURT

State of New Hampshire

v.

Adam Montgomery

Case Nos. 216-2022-CR-00020
216-2022-CR-00577

**STATE'S ASSENTED-TO MOTION TO EXTEND DEADLINE TO RESPOND TO
DEFENDANT'S MOTIONS TO SUPPRESS**

NOW COMES the State of New Hampshire, by and through its attorneys, the Office of the Attorney General, and respectfully requests that this Honorable Court extend by two weeks the State's deadline to respond to the defendant's motions to suppress. As grounds therefore, the State submits as follows:

1. On August 1, 2022, the defendant filed two motions to suppress: Motion to Suppress Statements from December 31, 2021, and Motion to Suppress Statements from January 4, 2022 (together, "the defendant's motions").
2. Per Rule 35(i)(1) of the New Hampshire Rules of Criminal Procedure, the State has 10 days to respond to the defendant's motions. This 10-day deadline would be August 11, 2022.
3. Undersigned counsel's personal and professional commitments, including a previously scheduled vacation and a one-and-one-half-day long training, would make it difficult for the State to respond to the defendant's motions within the usual 10-day deadline. Therefore, the State is requesting a two-week extension to its deadline to respond to the defendant's motions, to August 25, 2022.

Granted



Honorable Amy B. Messer

August 4, 2022

Clerk's Notice of Decision
Document Sent to Parties
on 08/04/2022

4. Counsel for the defendant assents to the relief requested herein.

WHEREFORE, the State of New Hampshire respectfully requests that this Honorable Court:

(A) Extend by two weeks, to August 25, 2022, the State's deadline to respond to the defendant's Motion to Suppress Statements from December 31, 2021 and Motion to Suppress Statements from January 4, 2022; and

(B) Grant such further relief as may be deemed just and proper.

Respectfully submitted,

THE STATE OF NEW HAMPSHIRE

By its attorneys,

John M. Formella
Attorney General

Date: August 3, 2022

/s/ Jesse O'Neill
Jesse O'Neill, NH Bar No. 20723
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CERTIFICATE OF SERVICE

I hereby certify that on this date a copy of the foregoing was sent to counsel for the defendant via the electronic case filing system.

/s/ Jesse O'Neill
Jesse O'Neill