

THE STATE OF NEW HAMPSHIRE

HILLSBOROUGH, SS

NORTHERN DISTRICT

STATE OF NEW HAMPSHIRE

v.

DALE HOLLOWAY

216-2019-CR-01856

**MOTION FOR HEARING ON STATUS OF COUNSEL**

NOW COMES the Defendant, by and through counsel, Donna J. Brown and Brian T. Lee, and requests that this Court schedule a hearing on status of counsel and in support thereof states as follows:

1. This matter is scheduled for Final Pretrial on October 28, 2020, with jury selection on November 30<sup>th</sup> and trial December 7<sup>th</sup>.
2. Defense counsel were appointed to this matter as there is a conflict with the New Hampshire Public Defender's Office.
3. Subsequent to the last hearing in this matter, which took place on October 8, 2020, Mr. Holloway communicated to Attorney Brown that he wanted her to withdraw from the case.
4. On October 19, 2020, Attorney Brown went to the House of Corrections to meet with Mr. Holloway and discuss his withdrawal request. Mr. Holloway declined to meet with counsel.

5. On October 20, 2020, Attorney Lee went to the House of Corrections to meet with Mr. Holloway. Mr. Holloway declined to meet with Attorney Lee.
6. Given the upcoming court dates and related filing deadlines defense counsel respectfully request that this Court schedule a hearing on the status of counsel as soon as possible.
7. Pending such hearing it is requested that current pre-trial filing deadlines be tolled.

WHEREFORE, the Defendant respectfully requests that this Honorable Court:

- A. Schedule a hearing on status of counsel; and,
- B. Stay and extend current pre-trial filing deadlines; and,
- C. Grant such other relief as is deemed just.

Respectfully submitted,  
Dale Holloway  
By his attorneys,

Dated: October 20, 2020

By: /s/ Donna J. Brown  
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CERTIFICATION

I hereby certify that a copy of this Motion has been e-filed to Catherine Devine and Brian Greklek-McKeon of the Hillsborough County Attorney's Office on this 20<sup>th</sup> day of October, 2020.

/s/ Donna J. Brown

Donna J. Brown