

STRAFFORD, SS

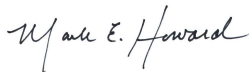
SUPERIOR COURT
DOCKET NO. 219-2022-CR-00064
DOCKET NO. 219-2022-CR-00068

Defendant granted leave
to file supplemental
objection on or before
August 22, 2022.

THE STATE OF NEW HAMPSHIRE

v.

MAURICIO GUERRERO



Honorable Mark E. Howard
August 16, 2022

OBJECTION TO STATES MOTION TO JOIN

NOW COMES, the Defendant, Mauricio Guerrero, by and through his Attorney, Harry N. Starbranch, who respectfully objects to the State's motion to Join.

As grounds for this Motion, your Defendant sets forth the following:

1. The Defendant is charged in felony indictment charging, inter alia, Burglary, (class A felonies).
2. That the State has filed a motion to join indictments.
3. The Defendant objects and wishes to be heard,
4. The Defendant requests additional time to confer with counsel and file a supplemental objection with the salient authority cited therein,
5. Specifically, the Defendant seeks a ten-day extension,
6. The State does not object to giving the Defendant and additional ten days to supplement his pleading. The State is not concurring with the Defendant on his substantive objection.

WHEREFORE, your Defendant moves that this Honorable Court Grant the following relief:

- A) That this Honorable Court deny the State's Motion to Join; and;

- B) Permit the Defendant to supplement his objection for an additional ten (10) day period,
- C) Schedule a hearing at the Clerk's convenience, and;
- D) Any such other and further relief as may be deemed just and proper.

Respectfully submitted,
Mauricio Guerrero,
By and Through his Attorney,
Harry N. Starbranch

Dated: August 9, 2022

/s/ Harry Starbranch
Harry N. Starbranch
NH Bar No. 6991
171 Middle Street
Portsmouth, NH 03801
(603) 436-5566

CERTIFICATE OF SERVICE

I, Harry N. Starbranch, Jr., Esq., hereby certify that a true copy of the foregoing **Defendant's Objection to the State's Motion to Join** has this date been served upon the Petition through ECF: Emily Garod, Esq., Strafford County Attorney's Office.

Dated: August 9, 2022

By: /s/ Harry Starbranch
Harry N. Starbranch, Jr., Esq.