

COÖS, SS.

SUPERIOR COURT

State of New Hampshire

v.

Volodymyr Zhukovskyy

214-2019-CR-078

ASSENTED MOTION TO EXTEND DEADLINE

NOW COMES the accused, by and through counsel, Jay Duguay and Steve Mirkin, Esq., and respectfully moves the Court pursuant to agreement with the State to extend by thirty days the deadline for filing a Motion *in Limine* concerning aspects of the accused's June 24, 2019, interview with State Police, and states as follows:

1. Per previous discussions with the Court, the parties were directed to confer as to which portions of said interview needed to be redacted.
2. On December 1, 2021, the defense forwarded to the State an email designating ten specific sections of said interview it wishes to have redacted.
3. The State responded on March 15, 2022, agreeing to redact four of the ten portions, and objecting in whole or in part to redacting the remaining six portions.
4. March 15, 2022, is the date the Court has set as a deadline for pretrial motions to be filed.
5. Due to the above timeline, there is not sufficient time remaining on March 15 for the defense to formulate and file an appropriate motion *in limine* as to the June 24 interview.
6. The State, Scott Chase, Esq., has indicated its ASSENT to extend the deadline thirty days, to April 15, 2022, for filing of a motion *in limine* in this regard.

Granted

/s/ Peter H. Bornstein
Honorable Peter H. Bornstein
March 16, 2022

Clerk's Notice of Decision
Document Sent to Parties
on 03/16/2022

WHEREFORE, the accused respectfully prays the Court to grant an extension through April 15, 2022, to file a motion *in limine* regarding redaction of portions of his June 24, 2019, interview with State Police, and for such further relief as may be just.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been forwarded this 15th day of March, 2022, to John G. McCormack, Esq., Coös County Attorney, and Scott Chase, Esq. and Josh Speicher, Esq., Assistant Attorneys General.



Steve Mirkin