

STATE OF NEW HAMPSHIRE  
SUPERIOR COURT, MERRIMACK, SS

Case No.: 217-2024-CR-1167

STATE OF NEW HAMPSHIRE,  
vs.  
ANNA BARBARA HANTZ MARCONI

**MOTION TO INTERVENE AT THE  
SEPTEMBER 16TH, 2025 HEARING**

NOW COMES Intervenor Brok-Alan Woodward-Griffith (“Griffith”), *pro se*, and hereby respectfully moves this Honorable Court to allow his intervention at the September 16<sup>th</sup>, 2025 hearing on the New Hampshire Judicial Branch’s *Motion to Clarify Subpoenas* (the “*Motion*”) (Doc. 122). By virtue of the *Motion*, Intervenor’s United States and State Constitutional rights are at stake, because the New Hampshire Supreme Court Justices are named witnesses in Intervenor civil trial, *Woodward-Griffith v. PC Connection, Inc., et al*, Case No. 216-2025-CV-00187 (Hills. Sup. North.). Further, the Supreme Court Justice have been duly subpoenaed by the Intervenor. Accordingly, because neither the State nor the Defendant to this action have any interest in Intervenor’s rights, **GRANTING** this intervention is proper.

**LEGAL STANDARD**

Superior courts have discretion over who may intervene in state court proceedings, and the “right of a party to intervene in pending litigation in this state has been rather freely allowed as a matter of practice.” Brzica v. Trustees of Dartmouth College, 147 N.H. 443, 446 (2002). New Hampshire has held that a non-party has a right to intervene in a criminal case, provided certain exceptions are met, such as when the intervenor’s constitutional or other rights are implicated by the resolution of a particular motion, request, or other issue during a criminal case. See In Re Rubenzer, No. 2015-0037, 2016 N.H. LEXIS 157 (Sep. 24<sup>th</sup>, 2025), quoting U.S. v.

1 Carmichael, 342 F. Supp. 2d 1070, 1072 (M.D. Ala. 2004). Third party intervention in criminal  
2 cases has been allowed to challenge a request for production of documents, or to protect other  
3 rights implicated by a particular proceeding. U.S. v. Carmichael, supra at 1072. (quoting Gravel  
4 v. U.S., 408 U.S. 606 (1972) (third party allowed to intervene relation to subpoena procedure  
5 where third party had U.S. Constitutional rights impacted).

7 Here, Intervenor’s Constitutional rights are implicated to call these justices as witnesses.<sup>1</sup>  
8 Moreover, there is no privilege that these Justices can assert that excuse their testimony, and  
9 requirement to respond to the Intervenor’s subpoenas. See Robbins v. Kalwall Corp., 120 N.H.  
10 451 (1980) (holding that a non-party holds the same, if not heightened duty, to provide  
11 discovery, citing U.S. v. Nixon 418 U.S. 683 (1974) for the proposition that discovery will be  
12 authorized even in face of claim of Constitutional privilege).

14 On the weight of the authorities presented, and the facts, analysis, and exhibits herein,  
15 this Honorable Court granting intervention is proper, and necessary, for the protection of  
16 Intervenor’s rights, including the fundamental constitutional right to summon witnesses – under  
17 both the State and Federal Constitution.

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21  
22  
23 <sup>1</sup> Under the United States Constitution: 1<sup>st</sup> Amendment (right of petition); 4<sup>th</sup> Amendment (under  
24 unreasonable search and seizure); 5<sup>th</sup> Amendment (due process); 6<sup>th</sup> Amendment; 9<sup>th</sup> Amendment; 10<sup>th</sup> Amendment;  
25 14<sup>th</sup> Amendment (equal protection); among others.

26 Under the New Hampshire Constitution: Part I, Art. 1; Part I, Art. 2; Part I, Art. 7; Part I, Art. 8; Part I.,  
27 Art. 14; Part I., Art. 15; Part I., Art. 22.

1 **BRIEF FACTUAL BACKGROUND**

- 2
- 3 1. On September 12<sup>th</sup>, 2025, the New Hampshire Judicial Branch filed a Motion to Quash in
- 4 Intervenor’s civil case, demonstrating that the Supreme Court, in fact, does *not* need
- 5 clarification on the subpoena process. A copy of the New Hampshire Supreme Court’s
- 6 Motion to Quash is attached as **Exhibit 1**. This was in response to Intervenor’s subpoena to
- 7 the New Hampshire Supreme Court Justices, in conjunction with prior serious judicial
- 8 misconduct, and possible alleged fraud and corruption, involving Defendant Hantz-Marconi,
- 9 and/or others, for actions taken against the Intervenor.
- 10
- 11 2. On July 11<sup>th</sup>, 2025, Intervenor Griffith filed a motion to vacate *all* orders issued by the New
- 12 Hampshire Supreme Court, on grounds of serious judicial misconduct, in relation to litigation
- 13 between Griffith and PC Connection, Inc., d/b/a Connection (“Connection”). Connection has
- 14 been fraudulently litigating against Griffith for over two and a half years. A copy of the
- 15 motion to vacate is attached hereto as **Exhibit 2**, and speaks for itself.
- 16
- 17 3. Griffith discovered this malfeasance by the Supreme Court Justices, in part, as a direct result
- 18 of Defendant Anna Barbara Hantz-Marconi (“Hantz-Marconi”) spontaneously alleging the
- 19 existence of a “vast judicial conspiracy” within the state of New Hampshire. See Doc. 100, ¶
- 20
- 21 4. Before this admission by the Defendant, no party had ever alleged the existence of any
- 22 “vast judicial conspiracy.”
- 23
- 24 4. On July 14<sup>th</sup>, 2025, Intervenor filed for recusal of the sitting Supreme Court Justices, as
- 25 material witnesses: MacDonald, Countway, Basset, and Donovan. A copy has been attached
- 26 as **Exhibit 3**, and speaks for itself.
- 27
- 28 5. Two months later, *neither of these motions have been acted on by the New Hampshire Supreme Court, at time of filing*. At minimum, this is grounds for further allegations of





1 Respectfully submitted,

2 Dated this 15<sup>th</sup> of September, 2025.

3  
4 /s/Brok-Alan Woodward-Griffith

5 

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Brok-Alan Woodward-Griffith, *pro se*

6 471 Silver Street, Apt. 105

7 Manchester, NH, 03103

8 [brokgrf@gmail.com](mailto:brokgrf@gmail.com)

9 603.325.0749

10 **CERTIFICATE OF SERVICE**

11 I hereby certify that a copy has been provided  
12 to all parties via the Court's eFile service.

13 **/s/Brok-Alan Woodward-Griffith**

14 **FACTUAL AVERMENT**

15 I hereby make oath and swear that the facts  
16 and allegations contained herein are true and  
17 accurate to the best of my knowledge, belief,  
18 and ability, without waiving the right to  
19 amend same as facts and circumstances so  
20 dictate. Further affiant sayeth naught.

21 **/s/Brok-Alan Woodward-Griffith**

# EXHIBIT 1

**THE STATE OF NEW HAMPSHIRE**

HILLSBOROUGH, SS.

HILLSBOROUGH COUNTY  
SUPERIOR COURT - NORTH

Brok-Alan Woodward-Griffith

v.

PC Connection, Inc., et al  
No. 216-2025-CV-00187

**MOTION TO QUASH**

NOW COMES, the New Hampshire Administrative Office of the Courts, by and through its counsel, Drummond Woodsum & MacMahon, and hereby moves the Court to grant this Motion to Quash the subpoenas served upon Chief Justice Gordon MacDonald, Justice Melissa Countway, Justice James Basset, and Justice Patrick Donovan of the New Hampshire Supreme Court, stating as follows:

1. The undersigned represents the institution of the state's judiciary, including by filing motions to quash subpoenas, motions to continue proceedings based on the unavailability of Judicial Branch witnesses, and other appropriate pleadings. The undersigned attorney's duties also include discouraging the pursuit of testimony of Judicial Branch employees, including judicial officers, when doing so would raise ethical issues for the witness, or even be contrary to law.

2. In the course of completing the duties described above, the undersigned has become aware that on August 29, 2025, Chief Justice Gordon MacDonald, Justice Melissa Countway, Justice James Basset, and Justice Patrick Donovan of the New Hampshire Supreme

Court were served with a subpoena to appear at 471 Silver Street, Manchester NH 03103, which, upon information and belief, is a residential apartment building. *See Appendix A.*

3. The undersigned has conferred with counsel for Justice Anna Barbara Hantz Marconi in this matter. While the subpoenas served upon Chief Justice Gordon MacDonald, Justice Melissa Countway, Justice James Basset, and Justice Patrick Donovan also name Justice Anna Barbara Hantz Marconi, upon information and belief, Justice Hantz Marconi has not been served with such subpoena as of the date of filing this motion. Since Justice Hantz Marconi has not been served there is no subpoena to quash in regard to her. Therefore, this Motion to Quash filed only with respect to the subpoenas served on Chief Justice Gordon MacDonald, Justice Melissa Countway, Justice James Basset, and Justice Patrick Donovan and is not filed on behalf of Justice Hantz Marconi.

4. The New Hampshire Constitution provides: “It is essential to the preservation of the rights of every individual, his life, liberty, property, and character, that there be an impartial interpretation of the laws, and administration of justice. It is the right of every citizen to be tried by judges as impartial as the lot of humanity will admit.” Part I, Article 35. This provision mandates that there be an independent judiciary so that the adjudication of individual controversies is fair and remains uninfluenced by outside forces. *See Petition of Mone*, 143 N.H. 128, 137 (1998) *citing State v. LaFrance*, 124 N.H. 171, 177–78 (1983). This includes the perception of partiality. *In re Petition of Jud. Conduct Comm.*, 151 N.H. 123, 126 (2004) (it is the Supreme Court’s responsibility to “foster public confidence in the judiciary”). It is the Supreme Court's responsibility “to oversee the operations of the judicial branch for the purposes of maintaining public confidence in the administration of justice.” *Opinion of the Justices (Judicial Salary Suspension)*, 140 N.H. 297, 299 (1995)

5. Therefore, specific laws limit the ability of judges to step off the bench and participate in cases as witnesses for either side. For over a hundred years, beginning with *Hale v. Wyatt*, 78 N.H. 214, 215–16 (1916), the New Hampshire Supreme Court has held that a judge may be a competent witness to prove all that occurred before him, but that he may not be compelled to testify. *See Gelinis v. Metropolitan Prop. & Liability Ins. Co.*, 131 N.H. 154, 168–69 (1988); *In re C.M.*, 166 N.H. 764, 778 (2014). The decision as to whether to testify is personal. *Hale*, 78 N.H. at 215. The judge may waive this personal privilege, but it is a matter entirely for the judge to decide. *See Gelinis*, 131 N.H. at 168–69; *In re C.M.*, 166 N.H. 764, 778 (2014); *see also Phelan v. Thompson*, 161 F.R.D. 7, 7–8 (D.N.H. 1994) (recognizing the existence of a state privilege for a judge not to testify and applying the privilege in a federal case where a New Hampshire state judge declined to be deposed by either party).

6. Further, no judge may be examined in this state as to his or her mental processes or the reasoning by which their decision is made. *Merriam v. Salem*, 112 N.H. 267, 268 (1972) (Individuals “acting in a judicial capacity ... may not be required to answer inquiries into the mental processes by which their decisions were reached.”). *See also Baldi v. Broderick*, No. CIV. 04-CV-466-PB, 2006 WL 1134922, at \*2 (D.N.H. Apr. 27, 2006) (“The decision-making or mental processes of judges is not subject to discovery. That is true under federal law. ... It is equally true under New Hampshire law.”).

7. The same rationale has protected judicial communications and other deliberative materials in other jurisdictions where they have been sought. *See, e.g., In re Enforcement of a Subpoena*, 463 Mass. 162, 174 (2012) (not only mental processes are protected from disclosure, but also “confidential communications among judges and between judges and court staff made in the course of and related to their deliberative processes”—an absolute privilege); *Butler v. Prince*

*George's Cnty.*, Maryland, No. CV 22-1768 PJM, 2024 WL 1376347, at \*10 (D. Md. Mar. 29, 2024) (precluding “any effort to require a state-court Judge to testify about his or her mental processes, whether individually or as a matter of collective policy”); *Kosiorek v. Smigelski*, 54 A.3d 564, 578 n. 19 (Conn. App. Ct. 2012) (noting that the lack of authority regarding the sanctity of the judicial deliberative process is “undoubtedly because its existence and validity has been so universally recognized”); *United States v. Nixon*, 418 U.S. 683, 708 (1974) (“the claim of confidentiality of judicial deliberations, for example, has all the values to which accord deference for the privacy of all citizens and, added to those values, is the necessity for protection of the public interest in candid, objective, and even blunt or harsh opinions in ... decisionmaking.”); *Thomas v. Page*, 361 Ill. App. 3d 484, 492 (2005) (“We believe that the benefits which [i]nure to the judicial decision-making process through the interchange of ideas between a judge and all of the members of the court’s staff would be diminished unless these communications remained confidential, including communications between a judge and another judge’s clerk.”).

8. New Hampshire law also provides that it is inappropriate to call a judge as a witness when there is any other person or record available to provide the evidence, it would be inappropriate to call a judge as a witness when there is any other person or record available to provide the evidence. *State ex rel Childs v. Hayward*, 109 N.H. 228, 230 (1968) (No judicial officer should “be subjected to interrogation with respect to the evidence presented before him when there is an existing record thereof.”); *In re C.M.*, 166 N.H. at 778 (the testimony sought from the judge could be fully established by official records). Other jurisdictions that lack New Hampshire’s judicial exemption from interrogation have uniformly found that a judge may only be called to provide evidence if the judge is the sole source of the evidence, amongst other

restrictions. *State v. Comprehensive Health of Planned Parenthood of Kansas & Mid-Missouri, Inc.*, 291 Kan. 322, 364 (2010) (“A judge should only be required to testify if ... the judge is the only possible source of the testimony on the relevant factual information.”); *see, e.g., all in accord United States v. Frankenthal*, 582 F.2d 1102, 1108 (7th Cir. 1978); *United States v. Roth*, 332 F. Supp. 2d 565, 568–70 (S.D.N.Y. 2004), *aff’d sub nom. United States v. St. John*, 267 F. App’x 17 (2d Cir. 2008); *People v. Knisley*, 2022 CO 59, ¶ 26–¶ 28; *State v. Sims*, 272 Neb. 811, 827–28 (2006); *Hatcher v. McBride*, 221 W. Va. 5, 14, (2006).

9. Here, it does not appear that Plaintiff made any reasonable efforts to obtain evidence by other means, including, but not limited, to requesting certified copies of court records.

10. A judge who has been requested to testify as a witness in a case may be required to “discourage the party from requiring him or her to testify.” *Hatcher v. McBride*, 221 W. Va. 5, 14 (2006); *see also* New Hampshire Code of Judicial Conduct Rule 3.3, Comment 1 (“A judge who, without being subpoenaed, testifies as a character witness abuses the prestige of judicial office to advance the interests of another. [...] Except in unusual circumstances where the demands of justice require, a judge should discourage a party from requiring the judge to testify as a character witness.”).

11. The filing of the motion in no way waives the right of any of the named judicial officers to raise any and all privileges and objections if this subpoena is not quashed.

WHEREFORE, for the foregoing reasons, the Administrative Office of the Courts respectfully requests that this Honorable Court:

A. Grant this Motion to Quash;

B. Grant any further relief as justice requires

Respectfully submitted,  
Administrative Office of the Courts  
By and through its Counsel,  
DRUMMOND WOODSUM

September 12, 2025

/s/ Sarah H. Freeman  
Sarah H. Freeman, NHB #270201  
670 N. Commercial St., Suite 207  
Manchester NH 03101  
(603) 792-7405  
[sfreeman@dwmlaw.com](mailto:sfreeman@dwmlaw.com)

CERTIFICATION

I hereby certify that on this day the 12<sup>th</sup> day of September 2025 above motion was served via electronic filing to the parties.

/s/ Sarah Freeman  
Sarah H. Freeman

## APPENDIX A

THE STATE OF NEW HAMPSHIRE  
JUDICIAL BRANCH  
https://www.courts.nh.gov

REC'D NH SUPREME COURT  
AUG 28 25 PM 12:09

Court Name: Hillsborough Superior Court - North  
Case Name: Brok-Alan Woodward-Griffith v. PC Connection, Inc., et al  
Case Number: 216-2025-CV-00187  
(if known)

SUBPOENA

To:

Chief Justice Gordon MacDonald  
Name of Witness

1 Charles Doe Drive  
Street Address

Concord, NH, 03301  
City, State, Zip Code

You are required to appear at: 471 Silver Street located  
Location (if at a courthouse, put name of court)

at 471 Silver Street, Manchester, NH, 03103  
Street Address City State

on 09/15/2025 at 9:30 AM to testify about the above case.  
Date Time

You are further required to bring with you the following:  
SEE ATTACHED SCHEDULE A

TODD W. RAINIER  
JUSTICE OF THE PEACE  
State of New Hampshire  
My Commission Expires  
February 8, 2028

IF YOU DO NOT APPEAR YOU MAY BE SUBJECT TO LEGAL PENALTIES

8/26/25  
Date

[Signature]  
Signature Justice of the Peace, Clerk of Court, or Judge

TODD RAINIER  
Printed name

Issued at the request of BROK-ALAN WOODWARD-GRIFFITH Phone number (optional) \_\_\_\_\_

RETURN OF SERVICE

On \_\_\_\_\_ at \_\_\_\_\_ o'clock in the  a.m.  p.m. I read or delivered in hand to the above-named person an original subpoena of which this is a true copy.

Signature \_\_\_\_\_

Printed name \_\_\_\_\_

Title (if applicable) \_\_\_\_\_

Agency (if applicable) \_\_\_\_\_

REQUESTING PARTY IS RESPONSIBLE FOR PAYMENT OF TRAVEL AND ATTENDANCE FEES

STATE OF NEW HAMPSHIRE

HILLSBOROUGH, SS  
*Northern District*

SUPERIOR COURT

**Docket No. 216-2025-CV-00187**

*For the issuance of a subpoena under N.H. RSA Chap. 516*

Brok-Alan Woodward-Griffith

v.

PC Connection, Inc., et al.

**SUBPOENA DUCES TECUM**

**TO: Supreme Court of New Hampshire**

**Justice Gordon MacDonald**

**Justice Melissa Countway**

**Justice James Basset**

**Justice Patrick Donovan**

**Justice Anna Barbara Hantz-Marconi**

1 Charles Doe Drive  
Concord, NH, 03301

You are hereby required to appear at 471 Silver Street, Manchester, NH, 03103, in the State of New Hampshire, County of Hillsborough, on the **15<sup>th</sup> Day of September, 2025 at 9:30 a.m.**, to bring with you all items listed in the attached **SCHEDULE A**.

**PLEASE NOTE:** in lieu of appearing in person, you may contact counsel for Brok-Alan Woodward-Griffith, who is appearing *pro se*, via email ([brokgrf@gmail.com](mailto:brokgrf@gmail.com)) or phone (603-325-0749) to make arrangements for production of the herein requested documents electronically or by mail.

HEREOF FAIL NOT, as you will answer your default under the penalties prescribed by law.

Dated at Manchester, NH, this 26<sup>th</sup> day of August 2025



**SCHEDULE A**  
**INSTRUCTIONS**

A. The Requests below are continuing in nature. All information discovered after the completion of your responses to these Requests must be promptly produced.

B. If any document or thing requested was formerly in your possession, custody, or control and has been lost or destroyed, please submit, in lieu of each document, a written statement that:

a. Describes in detail the nature of the document and its contents;

b. Identifies the person who prepared or authored the document, and, if applicable, the person to whom the document was sent;

c. Specifies the date on which the document was prepared or transmitted or both;  
and

d. Specify, if possible, the date on which the document was lost or destroyed, and, if destroyed, the conditions of or reasons for such destruction and the person requesting and performing the destruction.

C. If any documents required to be produced by this Subpoena are withheld, please identify the document by stating its date, author, recipients, and the reason for withholding.

D. If any of the requested documents fall within the scope of this Subpoena but have not been produced because of any claim of privilege, please provide a log including the following information as to each document to which such claim is made:

a. Its date;

- b. The name and address of its maker;
- c. The name and address of each person listed as an addressee or recipient, whether as addressee or copied;
- d. A brief description of the subject matter of the document;
- e. The nature of the privilege or immunity claimed; and
- f. A summary of all facts and circumstances upon which such a claim is based.

### **DEFINITIONS**

1. "And" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this set of interrogatories any information that might otherwise be construed to be outside its scope.

2. "Communication" means any act or instance of transferring, transmitting, passing, delivering or giving information, by oral, written, or electronic means, including, but not limited to, by notes, letter, telegram, telex, telephone facsimile, text message, tape, electronic mail, voicemail, or otherwise.

3. "Concerning" includes, but is not limited to, referring to, relating to, embodying, connecting to, commenting on, responding to, showing, describing, analyzing, reflecting, constituting, illustrating, depicting, summarizing, recording, evidencing, supporting, contradicting, and rebutting, either directly or by inference.

4. "Correspondence" includes, but is not limited to, letters, telegrams, inter or intraoffice memoranda, work communications, emails, text messages, notes and memoranda of meetings or oral communications and sound recordings and transcripts thereof, and all other written or electronic communications of whatever form.

5. "Document" includes, but is not limited to, material of every type and description, however produced and reproduced, including, but not limited to, correspondence, communications, memoranda, email or other electronic data of any kind or nature, contracts, subcontracts, agreements, transmittals, schedules, sketches, drawings, notes, diaries, photographs, samples, punch cards, discs, microfilm, bulletins, telegraphs, tape recordings, Dictaphone belts, printouts, financial records, corporate records and reports, minutes of meetings, credit records and reports, written statements, periodicals, policy or other manuals, warranties, advertising, contracts, work papers, work sheets, daily reports, charts, tables, graphs, photographs, notebooks, instructions, payroll records, invoices, bills, statements, promissory notes, checks, and handwritten notes, regardless of origin or location, in the possession, custody or control of the witness, plaintiff or their agents, accountants or attorneys. "Document" also means all copies of documents, by whatever means made, if the copy bears any other marking or notation not found on the original.

6. "Identify" shall mean to establish the identity of, and/or to describe in as much detail as possible.

7. "Griffith" shall mean Brok-Alan Woodward-Griffith, and/or any person acting on his behalf.

8. "Litigation" shall mean this action, Brok-Alan Woodward-Griffith v. PC Connection, Inc., et al, Docket No. 216-2025-CV-00187, pending in Hillsborough County Superior Court.

9. "Related Litigations" shall mean Brok-Alan Woodward-Griffith v. PC Connection, Inc., et al, Docket. No. 216-2025-CV-00092; PC Connection, Inc., v. Brok-Alan Woodward-Griffith, et al, Docket. No. 216-2023-CV-00220.

10. "Person" shall mean the plural as well as the singular, and includes any individual firm, partnership, corporation, proprietorship, business trust, association, joint venture, or any other entity.

11. "Relating to" or "Related to" shall mean evidencing, describing, constituting, consisting of, mentioning, forming the basis of, commenting on, supporting, analyzing, summarizing, or connected with.
12. "DCW" shall mean Data Center Warehouse, Inc., as well as any representative, agent, employee, or person acting on DCW's behalf.
13. "Hinckley Allen" shall mean Hinckley Allen & Snyder, LLP, as well as any representative, agent, employee, or person acting on Hinckley Allen's behalf.
14. "Fisher Phillips" shall mean Fisher & Phillips, LLP, as well as any representative, agent, employee, or person acting on Fisher Phillips' behalf.
15. "Connection" shall mean PC Connection, Inc., as well as any representative, agent, employee, or person acting on Connection's behalf.
16. "SCONH" "you" or "your" shall mean the Supreme Court of New Hampshire, as well as any representative, agent, employee, or person acting on the New Hampshire Supreme Court's behalf, including the Justices.
17. "Justices" shall mean the New Hampshire Supreme Court Justices collectively: Gordon MacDonald, Melissa Countway, James Basset, Patrick Donovan, Anna Barbara Hantz-Marconi.
18. Where indicated, the Justices will be referred to individually by last name, i.e., "Justice Hantz-Marconi," "Justice MacDonald," etc.
19. Words used in the singular, where the context permits, include the plural, and vice versa. The masculine gender, where the context permits, includes the feminine or neutral gender.

## REQUESTS

1. Identify and provide the e-mail addresses of Justices Countway, MacDonald, Donovan, Basset, and Hantz-Marconi.
2. Identify and provide all emails of the Justices between 2019 to present day that reference Griffith, Connection, DCW, Hinckley Allen, Fisher Phillips, the Litigation, and Related Litigations, individually and/or jointly.
3. Provide all SCONH documents and correspondences between 2019 to present day that reference Griffith, Connection, DCW, Hinckley Allen, Fisher Phillips, the Litigation, and Related Litigations, individually and/or jointly.
4. Provide all SCONH phone records between 2019 to present day.
5. Provide the personal phone records of the SCONH Justices, and identify all personal phone numbers associated with the SCONH Justices.
6. Provide all text messages of the SCONH Justices, from personal and publicly utilized sources, that reference Griffith, Connection, DCW, Fisher Phillips, Hinckley Allen, the Litigation, or Related Litigations, individually and/or jointly.
7. Provide SCONH phone records pertaining to the Justices, and identify the SCONH phone numbers provided to and/or utilized by the Justices.
8. Identify and provide all appeals to SCONH, where a memorandum of law was required to be submitted before acceptance of an appeal, from 2019 to present day.
9. Identify and provide the documents from all appeals to SCONH on a motion to dismiss, from 2019 to present day.
10. Identify and provide the documents from all appeals to SCONH on a motion to dismiss, which was declined by the Justices, from 2019 to present day.

11. Identify and provide the documents from all appeals to SCONH on a motion to intervene, from 2019 to present day.
12. Provide all documents and correspondence related to recusal and/or non-recusal, concerning all appeals from the Litigation and Related Litigations.
13. Provide all documents and correspondence related to the Supreme Court Appeal Case No. 2023-0527, including but not limited to the Justices' *en banc* decision.
14. Provide all documents and correspondence related to Chief Justice MacDonald's management of SCONH, including but not limited to rules, orders, or internal practices and procedures related to Chief Justice MacDonald's management of the New Hampshire Supreme Court.

THE STATE OF NEW HAMPSHIRE  
JUDICIAL BRANCH  
https://www.courts.nh.gov

RECORDED  
SEP 25 2025 12:09

Court Name: Hillsborough Superior Court - North  
Case Name: Brok-Alan Woodward-Griffith v. PC Connection, Inc., et al  
Case Number: 216-2025-CV-00187  
(if known)

SUBPOENA

To:

Justice James Bassett

Name of Witness

1 Charles Doe Drive

Street Address

Concord, NH, 03301

City, State, Zip Code

You are required to appear at: 471 Silver Street located  
Location (if at a courthouse, put name of court)

at 471 Silver Street, Manchester, NH, 03103

Street Address

City

State

on 09/15/2025 at 9:30 AM to testify about the above case.  
Date Time

You are further required to bring with you the following:

SEE ATTACHED SCHEDULE A

TODD W. RAINIER  
JUSTICE OF THE PEACE  
State of New Hampshire  
My Commission Expires  
February 8, 2028

IF YOU DO NOT APPEAR YOU MAY BE SUBJECT TO LEGAL PENALTIES

8/26/25

Date

Todd Rainier  
Signature Justice of the Peace, Clerk of Court, or Judge

TODD RAINIER

Printed name

Issued at the request of BROK-ALAN WOODWARD-GRIFFITH

Phone number (optional)

RETURN OF SERVICE

On \_\_\_\_\_ at \_\_\_\_\_ o'clock in the  a.m.  p.m. I read or delivered in hand to the above-named person an original subpoena of which this is a true copy.

Signature \_\_\_\_\_

Printed name \_\_\_\_\_

Title (if applicable) \_\_\_\_\_

Agency (if applicable) \_\_\_\_\_

REQUESTING PARTY IS RESPONSIBLE FOR PAYMENT OF TRAVEL AND ATTENDANCE FEES

STATE OF NEW HAMPSHIRE

HILLSBOROUGH, SS  
*Northern District*

SUPERIOR COURT

**Docket No. 216-2025-CV-00187**

*For the issuance of a subpoena under N.H. RSA Chap. 516*

Brok-Alan Woodward-Griffith

v.

PC Connection, Inc., et al.

**SUBPOENA DUCES TECUM**

**TO: Supreme Court of New Hampshire**

**Justice Gordon MacDonald**

**Justice Melissa Countway**

**Justice James Bassett**

**Justice Patrick Donovan**

**Justice Anna Barbara Hantz-Marconi**

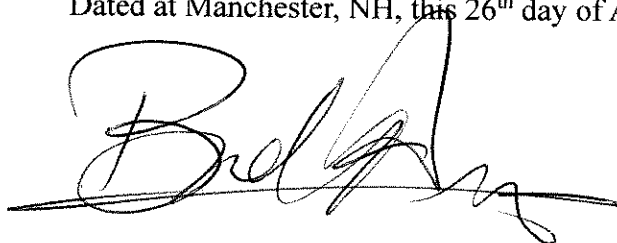
1 Charles Doe Drive  
Concord, NH, 03301

You are hereby required to appear at 471 Silver Street, Manchester, NH, 03103, in the State of New Hampshire, County of Hillsborough, on the **15<sup>th</sup> Day of September, 2025 at 9:30 a.m.**, to bring with you all items listed in the attached **SCHEDULE A**.

**PLEASE NOTE:** in lieu of appearing in person, you may contact counsel for Brok-Alan Woodward-Griffith, who is appearing *pro se*, via email ([brokgrf@gmail.com](mailto:brokgrf@gmail.com)) or phone (603-325-0749) to make arrangements for production of the herein requested documents electronically or by mail.

HEREOF FAIL NOT, as you will answer your default under the penalties prescribed by law.

Dated at Manchester, NH, this 26<sup>th</sup> day of August 2025



**SCHEDULE A**  
**INSTRUCTIONS**

A. The Requests below are continuing in nature. All information discovered after the completion of your responses to these Requests must be promptly produced.

B. If any document or thing requested was formerly in your possession, custody, or control and has been lost or destroyed, please submit, in lieu of each document, a written statement that:

a. Describes in detail the nature of the document and its contents;

b. Identifies the person who prepared or authored the document, and, if applicable, the person to whom the document was sent;

c. Specifies the date on which the document was prepared or transmitted or both;  
and

d. Specify, if possible, the date on which the document was lost or destroyed, and, if destroyed, the conditions of or reasons for such destruction and the person requesting and performing the destruction.

C. If any documents required to be produced by this Subpoena are withheld, please identify the document by stating its date, author, recipients, and the reason for withholding.

D. If any of the requested documents fall within the scope of this Subpoena but have not been produced because of any claim of privilege, please provide a log including the following information as to each document to which such claim is made:

a. Its date;

- b. The name and address of its maker;
- c. The name and address of each person listed as an addressee or recipient, whether as addressee or copied;
- d. A brief description of the subject matter of the document;
- e. The nature of the privilege or immunity claimed; and
- f. A summary of all facts and circumstances upon which such a claim is based.

### **DEFINITIONS**

1. "And" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this set of interrogatories any information that might otherwise be construed to be outside its scope.
2. "Communication" means any act or instance of transferring, transmitting, passing, delivering or giving information, by oral, written, or electronic means, including, but not limited to, by notes, letter, telegram, telex, telephone facsimile, text message, tape, electronic mail, voicemail, or otherwise.
3. "Concerning" includes, but is not limited to, referring to, relating to, embodying, connecting to, commenting on, responding to, showing, describing, analyzing, reflecting, constituting, illustrating, depicting, summarizing, recording, evidencing, supporting, contradicting, and rebutting, either directly or by inference.
4. "Correspondence" includes, but is not limited to, letters, telegrams, inter or intraoffice memoranda, work communications, emails, text messages, notes and memoranda of meetings or oral communications and sound recordings and transcripts thereof, and all other written or electronic communications of whatever form.

5. "Document" includes, but is not limited to, material of every type and description, however produced and reproduced, including, but not limited to, correspondence, communications, memoranda, email or other electronic data of any kind or nature, contracts, subcontracts, agreements, transmittals, schedules, sketches, drawings, notes, diaries, photographs, samples, punch cards, discs, microfilm, bulletins, telegraphs, tape recordings, Dictaphone belts, printouts, financial records, corporate records and reports, minutes of meetings, credit records and reports, written statements, periodicals, policy or other manuals, warranties, advertising, contracts, work papers, work sheets, daily reports, charts, tables, graphs, photographs, notebooks, instructions, payroll records, invoices, bills, statements, promissory notes, checks, and handwritten notes, regardless of origin or location, in the possession, custody or control of the witness, plaintiff or their agents, accountants or attorneys. "Document" also means all copies of documents, by whatever means made, if the copy bears any other marking or notation not found on the original.

6. "Identify" shall mean to establish the identity of, and/or to describe in as much detail as possible.

7. "Griffith" shall mean Brok-Alan Woodward-Griffith, and/or any person acting on his behalf.

8. "Litigation" shall mean this action, Brok-Alan Woodward-Griffith v. PC Connection, Inc., et al, Docket No. 216-2025-CV-00187, pending in Hillsborough County Superior Court.

9. "Related Litigations" shall mean Brok-Alan Woodward-Griffith v. PC Connection, Inc., et al, Docket. No. 216-2025-CV-00092; PC Connection, Inc., v. Brok-Alan Woodward-Griffith, et al, Docket. No. 216-2023-CV-00220.

10. "Person" shall mean the plural as well as the singular, and includes any individual firm, partnership, corporation, proprietorship, business trust, association, joint venture, or any other entity.

11. "Relating to" or "Related to" shall mean evidencing, describing, constituting, consisting of, mentioning, forming the basis of, commenting on, supporting, analyzing, summarizing, or connected with.
12. "DCW" shall mean Data Center Warehouse, Inc., as well as any representative, agent, employee, or person acting on DCW's behalf.
13. "Hinckley Allen" shall mean Hinckley Allen & Snyder, LLP, as well as any representative, agent, employee, or person acting on Hinckley Allen's behalf.
14. "Fisher Phillips" shall mean Fisher & Phillips, LLP, as well as any representative, agent, employee, or person acting on Fisher Phillips' behalf.
15. "Connection" shall mean PC Connection, Inc., as well as any representative, agent, employee, or person acting on Connection's behalf.
16. "SCONH" "you" or "your" shall mean the Supreme Court of New Hampshire, as well as any representative, agent, employee, or person acting on the New Hampshire Supreme Court's behalf, including the Justices.
17. "Justices" shall mean the New Hampshire Supreme Court Justices collectively: Gordon MacDonald, Melissa Countway, James Basset, Patrick Donovan, Anna Barbara Hantz-Marconi.
18. Where indicated, the Justices will be referred to individually by last name, i.e., "Justice Hantz-Marconi," "Justice MacDonald," etc.
19. Words used in the singular, where the context permits, include the plural, and vice versa. The masculine gender, where the context permits, includes the feminine or neutral gender.

## REQUESTS

1. Identify and provide the e-mail addresses of Justices Countway, MacDonald, Donovan, Basset, and Hantz-Marconi.
2. Identify and provide all emails of the Justices between 2019 to present day that reference Griffith, Connection, DCW, Hinckley Allen, Fisher Phillips, the Litigation, and Related Litigations, individually and/or jointly.
3. Provide all SCONH documents and correspondences between 2019 to present day that reference Griffith, Connection, DCW, Hinckley Allen, Fisher Phillips, the Litigation, and Related Litigations, individually and/or jointly.
4. Provide all SCONH phone records between 2019 to present day.
5. Provide the personal phone records of the SCONH Justices, and identify all personal phone numbers associated with the SCONH Justices.
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14. Provide all documents and correspondence related to Chief Justice MacDonald's management of SCONH, including but not limited to rules, orders, or internal practices and procedures related to Chief Justice MacDonald's management of the New Hampshire Supreme Court.

THE STATE OF NEW HAMPSHIRE  
JUDICIAL BRANCH  
https://www.courts.nh.gov

REC'D NH SUPREME COURT  
AUG 28 '25 PM 12:09

Court Name: Hillsborough Superior Court - North  
Case Name: Brok-Alan Woodward-Griffith v. PC Connection, Inc., et al  
Case Number: 216-2025-CV-00187  
(if known)

SUBPOENA

To:

Justice Melissa Countway

Name of Witness

1 Charles Doe Drive

Street Address

Concord, NH, 03301

City, State, Zip Code

You are required to appear at: 471 Silver Street located  
Location (if at a courthouse, put name of court)

at 471 Silver Street, Manchester, NH, 03103

Street Address

City

State

on 09/15/2025 at 9:30 AM to testify about the above case.

Date

Time

You are further required to bring with you the following:

SEE ATTACHED SCHEDULE A

TODD W. RAINIER  
JUSTICE OF THE PEACE  
State of New Hampshire  
My Commission Expires  
February 8, 2028

IF YOU DO NOT APPEAR YOU MAY BE SUBJECT TO LEGAL PENALTIES

8/26/25

Date

Todd W. Rainier  
Signature Justice of the Peace, Clerk of Court, or Judge

TODD RAINIER  
Printed name

Issued at the request of BROK-ALAN WOODWARD-GRIFFITH Phone number (optional) \_\_\_\_\_

RETURN OF SERVICE

On \_\_\_\_\_ at \_\_\_\_\_ o'clock in the  a.m.  p.m. I read or delivered in hand to the above-named person an original subpoena of which this is a true copy.

Signature \_\_\_\_\_

Printed name \_\_\_\_\_

Title (if applicable) \_\_\_\_\_

Agency (if applicable) \_\_\_\_\_

REQUESTING PARTY IS RESPONSIBLE FOR PAYMENT OF TRAVEL AND ATTENDANCE FEES

STATE OF NEW HAMPSHIRE

HILLSBOROUGH, SS  
Northern District

SUPERIOR COURT

**Docket No. 216-2025-CV-00187**

*For the issuance of a subpoena under N.H. RSA Chap. 516*

Brok-Alan Woodward-Griffith

v.

PC Connection, Inc., et al.

**SUBPOENA DUCES TECUM**

**TO: Supreme Court of New Hampshire**

**Justice Gordon MacDonald**

**Justice Melissa Countway**

**Justice James Bassett**

**Justice Patrick Donovan**

**Justice Anna Barbara Hantz-Marconi**

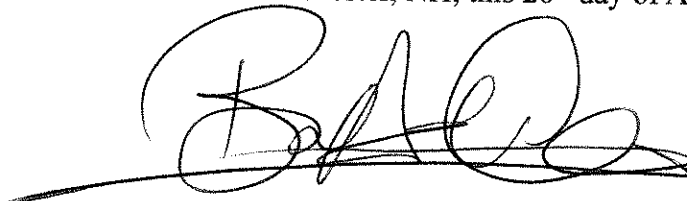
1 Charles Doe Drive  
Concord, NH, 03301

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Dated at Manchester, NH, this 26<sup>th</sup> day of August 2025



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THE STATE OF NEW HAMPSHIRE  
JUDICIAL BRANCH  
https://www.courts.nh.gov

REC'D NH SUPREME COURT  
AUG 28 25 PM 12:08

Court Name: Hillsborough Superior Court - North  
Case Name: Brok-Alan Woodward-Griffith v. PC Connection, Inc., et al  
Case Number: 216-2025-CV-00187  
(if known)

SUBPOENA

To: Justice Patrick Donovan  
Name of Witness  
1 Charles Doe Drive  
Street Address  
Concord, NH, 03301  
City, State, Zip Code  
You are required to appear at: 471 Silver Street located  
Location (if at a courthouse, put name of court)  
at 471 Silver Street, Manchester, NH, 03103  
Street Address City State  
on 09/15/2025 at 9:30 AM to testify about the above case.  
Date Time

You are further required to bring with you the following:  
SEE ATTACHED SCHEDULE A

TODD W. RAINIER  
JUSTICE OF THE PEACE  
State of New Hampshire  
My Commission Expires  
February 8, 2028

IF YOU DO NOT APPEAR YOU MAY BE SUBJECT TO LEGAL PENALTIES

8/26/25  
Date  
T. Rainier  
Signature Justice of the Peace, Clerk of Court, or Judge  
Todd Rainier  
Printed name  
Issued at the request of Brok-Alan Woodward-Griffith Phone number (optional) \_\_\_\_\_

RETURN OF SERVICE

On \_\_\_\_\_ at \_\_\_\_\_ o'clock in the  a.m.  p.m. I read or delivered in hand to the above-named person an original subpoena of which this is a true copy.  
Signature \_\_\_\_\_  
Printed name \_\_\_\_\_  
Title (if applicable) \_\_\_\_\_  
Agency (if applicable) \_\_\_\_\_

REQUESTING PARTY IS RESPONSIBLE FOR PAYMENT OF TRAVEL AND ATTENDANCE FEES

STATE OF NEW HAMPSHIRE

HILLSBOROUGH, SS  
Northern District

SUPERIOR COURT

**Docket No. 216-2025-CV-00187**

*For the issuance of a subpoena under N.H. RSA Chap. 516*

Brok-Alan Woodward-Griffith

v.

PC Connection, Inc., et al.

**SUBPOENA DUCES TECUM**

**TO: Supreme Court of New Hampshire**

**Justice Gordon MacDonald**

**Justice Melissa Countway**

**Justice James Bassett**

**Justice Patrick Donovan**

**Justice Anna Barbara Hantz-Marconi**

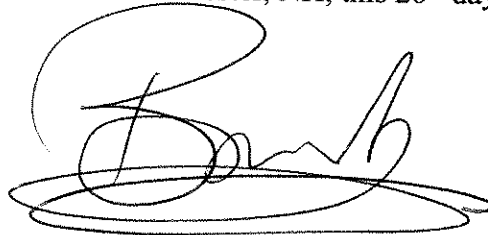
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7. Provide SCONH phone records pertaining to the Justices, and identify the SCONH phone numbers provided to and/or utilized by the Justices.
8. Identify and provide all appeals to SCONH, where a memorandum of law was required to be submitted before acceptance of an appeal, from 2019 to present day.
9. Identify and provide the documents from all appeals to SCONH on a motion to dismiss, from 2019 to present day.
10. Identify and provide the documents from all appeals to SCONH on a motion to dismiss, which was declined by the Justices, from 2019 to present day.

11. Identify and provide the documents from all appeals to SCONH on a motion to intervene, from 2019 to present day.
12. Provide all documents and correspondence related to recusal and/or non-recusal, concerning all appeals from the Litigation and Related Litigations.
13. Provide all documents and correspondence related to the Supreme Court Appeal Case No. 2023-0527, including but not limited to the Justices' *en banc* decision.
14. Provide all documents and correspondence related to Chief Justice MacDonald's management of SCONH, including but not limited to rules, orders, or internal practices and procedures related to Chief Justice MacDonald's management of the New Hampshire Supreme Court.

# EXHIBIT 1

STATE OF NEW HAMPSHIRE  
SUPREME COURT

Appeal Case No. 2025-0252

Brok-Alan Woodward-Griffith  
Appellant

v.

PC Connection, Inc., d/b/a Connection  
Et al.  
Appellee

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**APPELLANT’S MOTION TO VACATE JUSTICE COUNTWAY’S  
AND THIS SUPREME COURT’S ORDERS ON GROUNDS OF ILLEGALITY  
AND SERIOUS JUDICIAL MISCONDUCT**

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Pursuant to Supreme Court Rule 22A, and N.H. RSA 490:30-b, III, Appellant/Petitioner and **forced *pro se***<sup>1</sup> Brok-Alan Woodward-Griffith hereby respectfully submits this *Motion to Vacate* prior orders of Justice Melissa Beth Countway (“Countway”), and this Supreme Court, on grounds of illegality and serious judicial misconduct. Further, Appellant has concurrently filed a *Motion for Recusal* of all present Justices of this Supreme Court, as all current sitting Justices are, or have become, necessary witnesses to the judicial misconduct as outlined herein, and the corruption, bribery, and serious misconduct of Justice Anna Barbara Hantz Marconi (“Marconi”). The judicial corruption and fraudulent behavior of Defendant/Appellee Barbara Marconi directly caused Appellant’s underlying civil action, from which this instant appeal is taken.

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<sup>1</sup> “Forced *pro se*” reflects Appellant’s involuntary status due to fraud, obstruction, unlawful and/or other improper conduct, that substantially impaired and/or prevented Plaintiff’s access to unconflicted legal counsel, and/or was part of a deliberate strategy to deprive and/or obstruct Plaintiff’s rights. Moreover, the judicial misconduct as outlined herein underscore the New Hampshire Supreme Court’s continued attempts to shirk its constitutionally mandated duties to Appellant, and demonstrates a pattern of serious judicial misconduct by the New Hampshire Supreme Court.

Furthermore, the pattern of judicial misconduct and illegality that Justice Countway and this Supreme Court has engaged in gives probable cause to believe this sitting Supreme Court is “closing ranks” in effort to protect Justice Marconi from Appellant’s simultaneous appeal in Justice Marconi’s criminal case, whereby Appellant seeks to obtain grand jury materials which are believed to contain evidence of Justice Marconi’s bribery, corruption, and/or other illegal *quid pro quo* schemes Justice Marconi was engaged in. The highly improper conduct by this Supreme Court further lends probable cause to believe that this Supreme Court was likewise engaged in similar serious misconduct, and/or illegal behavior, and is seeking to shield such evidence from public scrutiny.

Appellant states in support as follows.

### **FACTUAL & PROCEDURAL BACKGROUND**

1. This appeal was taken from *Brok-Alan Woodward-Griffith v. PC Connection, Inc., et al.*, Case No. 216-2025-CV-00187 (Hills. Sup. North.), and was timely filed on May 12<sup>th</sup>, 2025. See Notice of Appeal, 5-12-2025.
2. This appeal arose out of violations to Appellant’s Constitutional rights, both state and Federal, including but not limited to due process violations. See Appel’t Mot. for Clarif... and Brief Memo., 6-25-2025.
3. Despite the grounds for this appeal being well-settled law, Justice Countway denied this appeal, without prejudice, on procedural grounds, pursuant to Supreme Court Rule 21(7), sitting as a single justice. See Dismissed, 7-01-2025.
4. Moreover, Justice Countway ruled on a motion of substance, sitting as a single justice. See Dismissed, 7-01-2025. (Justice Countway Order, ruling on Appellant’s *Mot. for Clarification*)

5. Notably, this has become a pattern of conduct for Justice Countway, who has now sat, as a single justice, on five (5) separate mandatory appeals of Appellant, ruled on motions of substance, and denied such appeals on procedural grounds, despite such appeals being grounded upon well-settled law. See Case No.'s 2024-0610, 2024-0678, 2024-0708, 2025-248, 2025-0252 (N.H. Supr. Ct.); See also Case No.'s 2024-0624, 2024-0684 (N.H. Supr. Ct.; Justices ruling as group).
6. Further, Justice Countway's denials are similarly improper, and mirror the misconduct, that Justice Marconi engaged in when she was bribed into denying Appellant's first appeal in Case No. 2024-0527 (N.H. Supr. Ct.). Justice Marconi is an Appellee to this instant appeal, and a Defendant in the underlying action.
7. Moreover, Appellant is simultaneously appealing a decision in Justice Marconi's criminal case, *State of New Hampshire v. Anna Barbara Hantz Marconi*, Case No. 217-2024-CR-01167; Appeal Case No. 2025-0203 (N.H. Supr. Ct.). The nature of the appeal is Griffith seeking to intervene by right to collect evidence to support his allegations of Justice Marconi's bribery and corruption, which are believed to have been collected by the New Hampshire Attorney General and presented to the grand jury in that case. Such discretionary appeal was timely filed on April 18<sup>th</sup>, 2025, and has been pending summary reversal since June 11<sup>th</sup>, 2025. See Case No. 2025-0203 (N.H. Supr. Ct.).
8. Instead of addressing Petitioner's motion for summary reversal pending in the appeal from Defendant/Appellee Marconi's criminal trial, Case No. 2025-0203 (N.H. Supr. Ct.), the Supreme Court and Justice Countway elected to hurriedly rule on *this* current appeal, improperly denying this appeal on July 1<sup>st</sup>, 2025, on procedural grounds. This current appeal had only been ripe for adjudication since June 25<sup>th</sup>, 2025, the day Appellant submitted his

memorandum of law concerning this appeal. See *Appel't Mot. for Clarif. and Brief Memo.*, 6-25-2025.

9. By contrast, Petitioner's motion for summary reversal in the appeal from Defendant/Appellee Marconi's criminal trial has been pending since June 11<sup>th</sup>, 2025. Further, this Supreme Court ***failed*** to address Petitioner's ***emergency*** motion for stay under Case No. 2025-0203, which was ***filed on June 30<sup>th</sup>, 2025, the day before Justice Countway improperly denied this current appeal on procedural grounds.*** At time of filing, Case No. 2025-0203 ***remains without a ruling.***
10. Stating the prior paragraphs differently, and to highlight the importance, ***this Supreme Court has delayed summarily reversing the trial court's decision in Justice Marconi's criminal case and avoided ruling on Appellant's Emergency Motion for Stay.*** Moreover, ***this Supreme Court prioritized ruling on this instant appeal, which had only been ripe for preliminary ruling for six (6) days, rather than ruling on Appellant's appeal in Marconi's criminal case, which has been pending, at time of filing, for over thirty (30) days.*** Crucially, the ***only*** proper and lawful conclusion that the Supreme Court could arrive at in Justice Marconi's criminal appeal (Case. No. 2025-0203) is summary reversal, due to the trial court's order being insufficient, and failing to meet the test allowing for summary affirmance. See Case No. 2025-203 (N.H. Supr. Ct.), *Appel't Obj to... Mot for Summ. Affirm, Appel't Mot for Summ. Reversal, Appel't Memo. Of Law.* 6-11-2025.
11. Further underscoring this pattern of misconduct, Justice Countway has at least twice ruled on motions of substance, sitting as a single justice. See *Appel't Mot. for Clarif. and Dismissed*, 07-01-2025; See also Case No. 2024-0248, *Mot. to hold Owen R. Graham in Contempt and Appeal Dismissed*, 6-12-2025 (N.H. Supr. Ct.).

12. Supreme Court justices are forbidden from ruling, as a single justice, on motions of substance and/or dispositive motions, such as detailed prior, by N.H. Supreme Court Rule 20(2). See N.H. Supr. Ct. R. 20(2); See also N.H. Supr. Ct. R. 21(5), 21(7). Such motions, such as Appellant’s *Motion for Clarification*, and *Motion to Hold Owen R. Graham in Contempt*, are motions of substance, and/or dispositive, and therefore require **AT MINIMUM** a three-justice majority. See again N.H. Supr. Ct. R. 20(2), 21(5), 21(7).
13. Troublingly, the current Justices of this Supreme Court (MacDonald, Donovan, Basset, and Countway)(hereinafter, “these Supreme Court Justices”) have continually refused to recuse themselves despite amply being made aware of their status as witnesses in Petitioner’s underlying civil cases. See Case No. 2024-0610, 2024-0624, 2024-0678, 2024-0684, 2024-0708. Additionally, when refusing to recuse themselves, these Supreme Court Justices failed to comply with Supreme Court Rule 21A, which requires that a denial “shall be supported by findings of fact with respect to the allegations contained in the motion.” See N.H. Supr. Ct. R. 21A.
14. When the Court has recused itself, which ***only*** occurred in the first appeal taken by Petitioner from Defendant/Appellee Marconi’s criminal trial, these Supreme Court Justices elected to ignore Petitioner’s motion to recuse, instead, option to declare it “moot,” and therefore recusing on these Supreme Court Justices’ own motion. See Case No. 2024-0707, *Recusal Order*, 12-19-2025. This *sua sponte* recusal by these Supreme Court Justices demonstrates that they are amply aware their involvement in proceedings involving Petitioner raises ample appearance of impropriety, and rises to actual impropriety.
15. Upon information and belief, Justice Countway has taken these actions, and implemented these rulings, at the instruction of Chief Justice MacDonald, who is implicated as a witness in

Justice Marconi’s criminal case, and further implicated as a witness in Appellant’s underlying civil case from which this appeal is taken. Further, upon information and belief, these actions by the current Supreme Court Justices were taken at the urging of Christopher H.M. Carter, Esq., and/or others presently unknown at this time, to deliberately violation Petitioner’s constitutional rights, including but not limited to equal protection and due process, as part of a deliberate and improper, and/or unlawful, legal strategy against the Petitioner.

16. As Justice Countway has now ruled again, in this current appeal, on dispositive motions and/or motions of substance as a single justice, this instant motion to vacate orders of the Supreme Court has been filed, along with recusal of the other current sitting justices.

### **ARGUMENT**

#### I. Justice Countway COULD NOT Act as A Single Justice under Rule 21(7)

As these were Rule 7 Mandatory Appeals by Petitioner, Justice Countway was not permitted by Supreme Court rules to act as a single justice on most, if not all, appeals filed by the Appellant, and therefore any orders resulting from this serious misconduct and illegality must be vacated.

New Hampshire Supreme Court (“SCONH”) Rule 21(7) provides:

“A single justice may rule on all **non-dispositive motions** and may issue any **non-dispositive order**. A single justice may rule upon requests to withdraw or dismiss an appeal filed by the appellant, may dismiss an appeal pursuant to Rule 5(4), Rule 15(2) or Rule 16(12); and **may dismiss an appeal without prejudice upon procedural grounds**. Any order of a single justice shall state which justice so ruled.” See N.H. Supr. Ct. R. 21(7). (emphasis added)

Accordingly, when invoking SCONH Rule 21(7), as Justice Countway has done here - and in prior appeals - the **only** permissible justification to act as a solo justice was a dismissal on procedural grounds. These procedural grounds are defined by SCONH Rule 25(7), which provides that these procedural grounds are “jurisdiction, mootness, untimeliness, or **other cause unrelated to the merits of the appeal.**” See N.H. Supr. Ct. R. 25(7). No such procedural grounds existed here, and no alternative grounds existed generally for Justice Countway to dismiss the appeal as a solo justice under SCONH Rule 21(7). Likewise, no procedural grounds existed under SCONH Rule 21(7) for then-Justice Marconi to deny Appellant’s first appeal in Case No. 2023-0527 (N.H. Supr. Ct.), and therefore the Supreme Court’s *en banc* ratification of this serious judicial misconduct by Justice Countway and then-Justice Marconi inextricably ties the current Supreme Court to this serious judicial misconduct and illegality. As then-Justice Marconi invoked Rule 21(7) to dismiss Appellant’s appeal in Case No. 2023-0527, when SCONH Rule 25(7) plainly forbids anything short of a majority concurrence when disposing of a Rule 7 Mandatory Appeal – this undisputably ties all current sitting Justices of this Supreme Court to Defendant/Appellee’s misconduct, and at minimum, renders all material witnesses.

Justice Countway and the Supreme Court was amply aware<sup>2</sup> that no procedural grounds existed for dismissal under Rule 21(7), by virtue of Appellant’s *Motion for Clarification and Brief Memo. Of Law* – which explained the well-settled law concerning appeals based on constitutional rights violations. See *Appel’t Mot. for Clarif. and Brief Memo*, 6-25-2025. By way of brief restatement, the well-settled law in New Hampshire is that when constitutional rights have or will be violated, a party **always** has standing, and standing is a question of subject matter

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<sup>2</sup> “‘Knowingly,’ ‘knowledge,’ ‘known,’ and ‘knows’ mean actual knowledge of the fact in question. A person’s knowledge may be inferred from circumstances.” See N.H. Supr. Ct. R. 38, TERMINOLOGY

jurisdiction, *which may be raised at any time*. See e.g. Libertarian Party of N.H. v. Sec’y of State, 158 N.H. 194, 195 (2008); Gen. Elec. Co. v. Comm’r, New Hampshire Dep’t of Revenue Admin., 154 N.H. 457, 462 (2006).

Furthermore, Justice Countway and the Supreme Court were presented with the trial courts order in this current appeal, which *unequivocally stated* that the trial court “held no trial or hearing on the merits” and yet ordered that Appellant had “no appreciable likelihood of success.” This is a **bright line** violation of Appellant’s due process rights, and therefore Justice Countway was not only forbidden by the SCONH rules from dismissing the appeal on procedural grounds, but also forbidden to act as a single justice. See *Appel’t Mot. for Clarif. and Memo. Of Law*, 6-25-2025.

In addition, Appellant’s *Motion for Clarification and Brief Memorandum of Law* is a motion of substance, and/or a dispositive motion, and therefore Justice Countway was again, forbidden by the rules from acting as a single justice on such a motion. SCONH Rule 20(2) clearly proscribes single justices from ruling on such motions:

“Without limiting the authority of a single justice under Rule 21(7), **a majority consisting of at least three justices**, either full-time or temporarily assigned pursuant to RSA 490:3, **must concur in any judgment of the court.**”

Discussed prior, Rule 21(7) *only* permits a single justice to rule in four (4) scenarios:

- 1) Non-dispositive motions, and non-dispositive orders;
- 2) A motion to withdraw the appeal *filed by the Appellant*;
- 3) A dismissal pursuant to Rule 5(4), Rule 15(2) or Rule 16(12);
- 4) A dismissal on procedural grounds (jurisdiction, mootness, untimeliness, or other cause unrelated to merits of appeal

Crucially, none of these four scenarios were present here, *or in Petitioner's prior Rule 7 Mandatory appeals*, and therefore Justice Countway's single-justice ruling dismissing this instant appeal, and prior appeals, on procedural grounds was blatantly improper, unlawful, and rises to serious judicial misconduct. Furthermore, the Supreme Court Justices concurring in such procedural dismissals by Justice Countway, beginning with Justice Marconi in Supreme Court Case No. 2023-0527, results in the entire panel of current justices committing serious judicial misconduct.

Finally, as this was a Rule 7 Mandatory appeal under SCONH rules, the Supreme Court Justices were forbidden to act as solo justices under the authority granted by SCONH Rule 21(7). In a mandatory Rule 7 Appeal, the procedures are governed by SCONH Rule 25, "Summary Disposition," and specifically, Rule 25(7), *which requires, at minimum, a three justice majority pursuant to Rule 20(2)*. See N.H. Supr. Ct. R. 7, R. 25(7), R. 20(2). The failure to obtain a three-justice majority when dismissing Petitioner's mandatory appeals therefore rises to serious judicial misconduct, illegality, and further demonstrates awareness that the other current sitting Supreme Court Justices (MacDonald, Donovan, Basset) are all necessary material witnesses.

## II. Justice Countway SHOULD HAVE Set This Appeal Before a 3JX Panel

As this was an appeal concerning the constitutional rights of the Appellant, *which is well-settled law*, the *only* lawful course of action required that Justice Countway accept this appeal. Conforming with the requirement that Justice Countway was lawfully *mandated* to accept this instant appeal, as it was filed as a Rule 7 Mandatory Appeal, Justice Countway *could* have invoked SCONH Rule 12-D, which holds that the Court may decide that an appeal will be directed to a three justice ("3JX") panel, or that the parties may request same. See N.H. Supr. Ct. R. 12-D(1)(a), See also 12-D(5).

Specifically, Rule 12-D(5)(a) formally establishes that a 3JX panel is proper when the appeal “involv[es] claims of error in the application of settled law.” As stated prior, this is an appeal concerning constitutional rights of the Appellant, in an area of well-settled law not just federally, but within New Hampshire jurisprudence. As such, a Rule 12-D could have been invoked by Justice Countway, but crucially, Justice Countway ***had no option but to accept this appeal***, and ***had no power to dismiss it on procedural grounds***.

Furthermore, this appeal meets ***all*** the criteria outlined by SCONH Rule 12-D(5)(a)(b) and (c), and the questions brought to the Supreme Court on Appellant’s amended *Notice of Appeal* plainly establishes that these criteria have been met. See *Notice of Appeal Refiled*, 6-16-2025. As Justice Countway indicated in her order improperly dismissing this appeal on procedural grounds, she had reviewed all the documents referenced, and therefore either Justice Countway ***did not actually read*** these documents, or ***committed serious judicial misconduct and illegally dismissed this appeal***. Either scenario results in highly improper conduct, illegality, and serious judicial misconduct under the judicial canons.

Further, this is the improper pattern of conduct first established by then-Justice Anna Barbara Hantz Marconi, who likewise improperly dismissed Appellant’s first appeal in Supreme Court Case No. 2023-0527 on procedural grounds. The order in that appeal indicated that the documents were reviewed by Justice Marconi, and purportedly by the entire Supreme Court, who ratified then-Justice Marconi’s highly improper conduct and illegal procedural dismissal. This continued and ongoing pattern of misconduct more than establishes probable cause to believe that the present sitting Justices of this Supreme Court are attempting to “cover up” Marconi’s illegal dismissal in Case No. 2023-0527.

### III. Motions of Substance/Dispositive Motions Require a 3JX Majority

As SCONH Rule 21(7) limits the scope of a single justice's authority in dismissing an appeal, SCONH Rule 20 *mandates* that a three justice majority concur *in any opinion of the Supreme Court* if the motion relates to substance, or the motion is dispositive. Justice Countway's invocation of Rule 21(7) in dismissing this instant appeal, and prior appeals, is therefore illegal, rises to serious judicial misconduct, and establishes that actual impropriety has occurred in this, and prior, appeals.

First, Appellant's *Motion for Clarification and Brief Memo of Law* is a motion of substance, as it plainly requires the Supreme Court to answer substantial questions of law and procedure on constitutional grounds. Justice Countway was not permitted to act on such motion, dismissing same, as a single justice. Furthermore, in Case No. 2025-0248, Appellant's *Motion to Hold Owen R. Graham in Contempt* was likewise a "motion of substance." Her summary denial of such motion, without a 3JX majority, was likewise illegal and serious judicial misconduct. Moreover, such denial reflects a breach of impartiality, demonstrates favoritism, and further attempts to conceal the illegal conduct of the Appellees in this instant matter. This raises, at minimum, a substantial appearance of impropriety, in direct breach of the Code of Judicial Conduct.

In the alternative/in addition, these motions could be construed as dispositive motions, and therefore her actions as a solo justice are equally highly improper, and grounds for her decisions to be vacated. Furthermore, this demonstrates a pattern of conduct by Justice Countway that demonstrates a flagrant disregard for the Judicial Canons, and for the rules and law governing Supreme Court appeals.

Furthermore, the lack of concurrence, and/or effort to obtain a 3JX concurrence on these motions, and/or the Supreme Court ratifying the serious judicial misconduct *en banc* vis-à-vis the procedural dismissals, amply suggests that ***that Chief Justice MacDonald, and/or the entire current sitting Supreme Court Justices, are aware that they are material witnesses at minimum to Justice Marconi's serious judicial misconduct, illegal acts, and/or bribery and corruption.*** This is ample basis for vacating these orders, and for the recusal *en banc* of the entire current sitting Supreme Court.

In addition, before ruling *en banc* in Appellant's appeal under Case No. 2024-0678, the Supreme Court was made ***amply aware*** that fraud upon the court had occurred, and that the Supreme Court's intervention was not only necessary, but mandated. See Case No. 2024-0678 (N.H. Supr. Ct.), *Appel't Mot. to Recon. En Banc*, 3-13-2025. This Court took no action, and in fact, delayed ruling *en banc* **for over three (3) months**. Not only does this give rise to ample probable cause to believe serious judicial misconduct has occurred, but additionally highlights the ***extreme impropriety*** of Justice Countway rushing out an improper procedural dismissal in this current appeal in ***six (6) short days*** – especially when contrasted with the fact that Appellant's appeal in Marconi's criminal case, at time of filing, ***has now been ripe for summary reversal for over twenty-five (25) days.*** See Case No. 2025-0203 (N.H. Supr. Ct.), *Appel't Mot. for Summ. Revers.*, 6-11-2025.

Further, this Supreme Court, at time of filing, has failed to take any ***any*** action on Petitioner's emergency motion to stay under Case No. 2025-0203, which is ***clearly*** marked as an emergency motion. This emergency motion has been pending since June 30<sup>th</sup>, 2025. Given that this Supreme Court has demonstrated in this current appeal that it can “push out” expedited rulings in just six (6) days on non-priority appeals, ***where no party has requested expedited ruling***, this is ample

grounds for a reasonable person to believe in an appearance of impropriety, and further, that bias, favoritism, prejudice, external influences, and improper procedural misconduct, is guiding the decision of these Supreme Court Justices, in violation of the Judicial Canons. See N.H. Supr. Ct. R. 38, Rule 1.1, 1.2, 1.3, 2.2, 2.3, 2.4, 2.5, 2.6, etc.

#### IV. Justice Countway and the Sitting Justices' Actions rise to Serious Misconduct

For the reasons foregoing and following, Justice Countway's actions, and the Supreme Court *en banc* thereby, are direct and flagrant breaches of the Judicial Code of Conduct, and rise to serious judicial misconduct, which warrants vacating this, and prior, orders of the New Hampshire Supreme Court.

In no way limiting analysis to this specific case, and reserving all rights to further elaborate and supplement this instant filing as facts, needs, and circumstances so dictate, the analysis in In Re Case of Snow, 140 N.H. 618 (1996)<sup>3</sup> is germane and applicable. First, Snow held that judicial conduct which violated several judicial canons amounted to "serious [misconduct]." *Id.* at 624. Moreover, even if the factual findings in a particular case of judicial misconduct were "less serious" than other circumstances which violated the same canons, this does not alleviate the "serious" label. *Id.* Further, under the appearance of impropriety standard, which has occurred here, "the subjective intent or motivation of the judge is not a significant factor in assessing the judge's conduct...under this standard." *Id.* Underscoring the allegations of appearance of impropriety, is that actual impropriety has occurred. "Actual improprieties include violations of the law, court rules or Provisions of [The Judicial Code of Conduct]." See N.H. Rule. 38, Canon 1, Rule 1.2, Comment [5]. A judge's duty to obey the judicial canons, "especially to avoid the

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<sup>3</sup> Petitioner further respectfully fully incorporates by reference herein In Re Case of Snow generally, and the citations and discussions therein, for purposes of this motion.

appearance of impropriety, cannot be taken lightly.” Snow, supra at 627. Where the appearance of impropriety is credibly demonstrated, and moreover, ***actual impropriety under the Judicial Code of Conduct***, it is beyond question that the actions of these Supreme Court Justices as described herein amounts to serious judicial misconduct.

First, Justice Countway and the sitting Justices’ actions violates Canon 1, Rule 1.1 and Rule 1.2:

**Rule 1.1, Compliance with the Law**

A judge shall comply with the law, including the Code of Judicial Conduct.

**Rule 1.2, Promoting Confidence in the Judiciary**

A judge shall act at all times in a manner that promotes public confidence in the independence, integrity, and impartiality of the judiciary, and shall avoid impropriety and the appearance of impropriety. See N.H. Supr. Ct. R. 38. Canon 1.

Here, Justice Countway and the sitting Supreme Court acted in a manner that clearly violates Canon 1 of the Judicial Code of Conduct. By failing to act on Appellant’s appeal in Justice Marconi’s criminal trial, ***which has been pending for over thirty (30) days***, and instead, *sua sponte* fast-tracking a ruling on this instant appeal which ***was only properly pending preliminary decision by the Supreme Court for six (6) days***, Justice Countway and the Supreme Court has failed to act with honor, integrity, and impartiality – demonstrating substantial bias and favoritism, and crucially – ***lends probable cause to believe the Supreme Court is attempting to partially extinguish the grounds which exist for Appellant’s intervention in Marconi’s criminal trial.***<sup>4</sup>

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<sup>4</sup> This further exposes potential improper judicial conduct, illegality, impropriety, and favoritism and bias has occurred.

Further, Justice Countway sitting as a single justice ***on five (5) consecutive appeals of the Appellant and improperly dismissing such appeals on procedural grounds*** lends ample probable cause to further believe that Chief Justice MacDonald, and/or other Justices on the Supreme Court, are ***amply aware*** that they are material witnesses ***at minimum***, and therefore are not permitted to rule on any appeal involving the Appellant. Despite this fact, the current sitting Justices have ***continued to ratify Justice Marconi’s and Justice Countway’s improper and illegal procedural denials en banc***. This establishes that Rule 2.2, Rule 2.3, Rule 2.4, and Rule 2.6 of Canon 2 of the Code of Judicial Conduct has been breached, and that improper external influence is guiding the decisions of this Supreme Court.

Moreover, the very fact that Justice Countway ***improperly prioritized ruling on this appeal*** a mere ***six (6) days*** after it was “ripe” for preliminary acceptance, and when ***the day prior to issuing the ruling in this instant case***, Appellant had filed a request for an emergency stay in Marconi’s criminal appeal (See Case No. 2025-0203, N.H. Supr. Ct.), amply suggests that Justice Countway and the Supreme Court are breaching Rule 2.2 and Rule 2.3, *inter alia*, of the Code of Judicial Conduct, Canon 2.

This gives probable cause to believe ***all*** of the sitting Justices of the New Hampshire Supreme Court have been tainted, and/or engaged in substantial judicial misconduct. Further – Justice Marconi, in her criminal trial, has alleged the existence of this misconduct at the Supreme Court level. This leads Appellant to believe that Justice Marconi may be blackmailing the current sitting justices – MacDonald, Countway, Basset, and Donovan – into attempting to hide the evidence of her own misconduct. This is a clear breach of Rule 1.1 and Rule 1.2 of the code of judicial conduct, rises to serious judicial misconduct, and potential criminal behavior.

Furthermore, the fact that Justice Countway, backed by the sitting Supreme Court Justice and/or Chief Justice, attempted to brazenly violate Appellant’s constitutional rights – a **forced pro se litigant to whom the Supreme Court has a heightened duty under Rule 2.2 of the Code of Judicial Conduct** – speaks to bias, favoritism, external influences, improper ex-parte communications, and fails to ensure the right to be heard. Moreover, this directly implicates Justice Countway’s fitness to be a Supreme Court Justice, as she is either flagrantly ignoring the rules, duties, and obligations as a Supreme Court Justice, or is flagrantly and willfully violating those rules in effort to shield Justice Anna Barbara Hantz Marconi’s serious misconduct and illegal acts from public scrutiny. In addition to the other breaches, this is a breach of Rule 2.5 of the Judicial Code of Conduct by Justice Countway: “Competence, Diligence, and Cooperation.” Not only do Justice Countway’s actions rise to serious judicial misconduct, but also when considering Justice Countway was unable to clearly articulate *any* guiding principles of law at her confirmation hearing before the New Hampshire Executive Council, this amply gives reason to question Justice Countway’s general fitness to serve as a Supreme Court Justice.<sup>5 6</sup>

Accordingly, the following rules under Canon 2 of the Judicial Code of Conduct have been breached by Justice Countway, and the sitting Supreme Court Justices, by virtue of condoning and/or endorsing this serious judicial misconduct: Rule 2.2, Rule 2.3, Rule 2.4, Rule 2.5, Rule 2.6, Rule 2.7, Rule 2.9. See N.H. Supr. Ct. R. 38, Canon 2.

In light of the credibly demonstrated serious judicial misconduct that has occurred, and the fact that this has not just raised the appearance of impropriety, but rises to the direct

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<sup>5</sup> <https://indepthnh.org/2023/12/20/countway-confirmed-to-new-hampshire-supreme-court-laconia-land-deal-delayed/>

<sup>6</sup> <https://www.nhpr.org/nh-news/2023-12-20/melissa-countway-is-confirmed-to-nh-supreme-court>

definition of impropriety<sup>7</sup>, **Appellant actively reminds the Supreme Court Justices of their affirmative duty and obligation under Canon 2, Rule 2.15.**

Supreme Court Rule 38, Canon 2, Rule 2.15 provides, in relevant part:

**(A) A judge having knowledge that another judge has committed a violation of this Code that raises a substantial question regarding the judge's honesty, trustworthiness, or fitness as a judge in other respects shall inform the appropriate authority.**

(B) A judge having knowledge that a lawyer has committed a violation of the Rules of Professional Conduct that raises a substantial question regarding the lawyer's honesty, trustworthiness, or fitness as a lawyer in other respects shall inform the appropriate authority.

**(C) A judge who receives information indicating a substantial likelihood that another judge has committed a violation of this Code shall take appropriate action.**

(D) A judge who receives information indicating a substantial likelihood that a lawyer has committed a violation of the Rules of Professional Conduct shall take appropriate action.

This Rule is **not mere dictum**, but an ***obligation*** under N.H. Supr. Ct. R 38, Canon 2, Rule 2.15, and a judge ***is required to take action even if the judge does not have actual knowledge of the misconduct.*** See N.H. Supr. Ct. R. 38, Canon 2, Rule 2.15,

“Comment” [1][2]. In this instance, Appellant respectfully states the following authorities must and/or should have been noticed ***immediately***, upon Justice Marconi’s first unlawful and improper dismissal on procedural grounds, in Case No. 2023-0527, around October of 2023: The Judicial Conduct Committee, the House and Senate Majority and Minority leaders of the New Hampshire Congress, the Governor, the Executive Council, the Public Integrity Unit of the

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<sup>7</sup> “**Actual improprieties include violations of law, court rules or provisions of this Code.** The test for appearance of impropriety is whether the conduct would create in the mind of a reasonable, disinterested person fully informed of the facts a perception that the judge's ability to carry out judicial responsibilities with integrity, impartiality and competence is impaired.” See N.H. Supr. Ct. R. 38, Canon 1, Rule 1.2, “Comment” [5].

Attorney General, the Attorney General, and the New Hampshire House and Senate Judiciary Committees. If the current sitting Justices are unable to demonstrate that any action was taken in the wake of Justice Marconi's unlawful denial of Appellant's appeal, this is further grounds to believe systemic judicial misconduct has been committed by the Supreme Court – and crucially – ***Defendant Anna Barbara Hantz Marconi has spontaneously alleged the existence of systemic judicial corruption in her current criminal trial.*** See *State v. Anna Barbara Hantz Marconi*, 217-2024-CR-01167 (Merr. Super.); See also Case No. 2025-0203 (N.H. Supr. Ct.), *Appel't Mot. for Emerg. Stay*, Exh. 5., ¶ 4.

Petitioner, without prejudice, and without waiving any rights, reserves all rights to all further amendments, supplements, and/or otherwise, as facts, needs, and circumstances so dictate.

### **CONCLUSION**

In conclusion, “Judges are entrusted with immense authority over matters that affect the lives of all of New Hampshire’s citizens...It is a great public trust. Indeed, judges are the most visible symbol of the rule of law in our society. Without judges who are perceived to be trusted by members of the public as impartial, the authority of the rule of law is compromised.” Chief Justice Brock, In Re Case of Snow, 140 N.H. 618, 627 (1996) As charged herein, that public trust has been betrayed, and that authority has been compromised.

Accordingly, for, including but not limited to, the facts, reasons, and arguments foregoing, Appellant moves that the decisions in this appeal, and other named appeals, be vacated on the grounds of serious judicial misconduct, illegality, and/or fraud, pursuant to New Hampshire Supreme Court Rule 22A, and/or pursuant to N.H. RSA 490:30-b, III, and/or

otherwise, and that the sitting Justices Countway, Basset, Donovan, and MacDonald, fully recuse themselves from all further appeal matters affecting the Appellant forthwith.

**PRAYER FOR RELIEF**

**WHEREFORE**, without prejudice and without waiving any rights, Appellant respectfully requests that the Supreme Court:

- a. VACATE the dispositive Orders in Case No.'s 2024-0610, 2024-0624, 2024-0678, 2024-0684, 2024-0708, 2025-0248, and 2025-0252;
- b. ORDER THE RECUSAL of Justices Countway, MacDonald, Donovan, and Basset as material witnesses to Appellant's underlying civil action, and as potential Defendants;
- c. PRESERVE all Supreme Court documents and personal documents pursuant to pending litigation;
- d. RECOGNIZE the affirmative duty the Supreme Court Justices have under Rule 2.15 of the Judicial Code of Conduct, and take all such steps as required forthwith;
- e. DRAW a new pool of judges for proper adjudication of the appeals under 490:3, and/or otherwise;
- f. Any such other and further relief as is required to prevent continued manifest injustice to the Appellant, and any such other and further relief as is deemed just, necessary, equitable, and proper.

Respectfully submitted,

This 11<sup>th</sup> of July, 2025.

**/s/Brok-Alan Woodward-Griffith**

Brok-Alan Woodward-Griffith, *pro se*  
471 Silver Street, Apt 105  
Manchester, NH, 03103  
[Brokgrf@gmail.com](mailto:Brokgrf@gmail.com)  
Ph: 603.325.0749

**CERTIFICATE OF SERVICE**

I hereby certify that a copy has been provided to all parties via the Court's eFile system.

**/s/Brok-Alan Woodward-Griffith**

**FACTUAL AVERMENT**

I, Brok-Alan Woodward-Griffith of Manchester, NH, hereby make oath and swear that the facts and allegations herein are true and accurate to the best of my knowledge, belief, and ability, without waiving right to amend same at later date as facts, needs, and circumstances so dictate.

**/s/Brok-Alan Woodward-Griffith**

# EXHIBIT 1

STATE OF NEW HAMPSHIRE

SUPREME COURT

BROK-ALAN WOODWARD-GRIFFITH,

Case No.: 2025-0252

Plaintiff, Appellant

vs.

**APPELLANT’S EMERGENCY MOTION  
FOR RECUSAL OF JUSTICES  
COUNTWAY, MACDONALD,  
DONOVAN, & BASSET**

PC CONNECTION, INC.;  
DATA CENTER WAREHOUSE, LLC;  
PATRICIA GALLUP;  
CHRISTOPHER H.M. CARTER, ET AL

Defendant, Appellee

Pursuant to N.H Supr. Ct. R. 21A, **forced *pro se***<sup>1</sup> Appellant/Petitioner Brok-Alan Woodward-Griffith (“Griffith”) hereby respectfully moves for recusal of the present sitting Justices of the New Hampshire Supreme Court: Justice Melissa B. Countway, Justice Patrick E. Donovan, Justice James P. Basset, and Chief Justice Gordon J. MacDonald (hereinafter, “these Supreme Court Justices”). Appellant states in support as follows.

**LEGAL STANDARD**

1. New Hampshire Supreme Court Rule 21A, “Motions for Recusal,” governs the procedure for recusal of Supreme Court Justices. See N.H. Supr. Ct. R. 21A. (hereinafter, “Rule 21A”)
2. In pertinent part. Rule 21A states that:  
“A motion for recusal shall: (1) be made in writing, (2) state clearly and concisely in separately numbered paragraphs each ground relied upon as a basis for recusal together with

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<sup>1</sup> “Forced *pro se*” reflects Plaintiff’s involuntary status due to fraud, obstruction, unlawful and/or other improper conduct, that substantially impaired and/or prevented Plaintiff’s access to unconflicted legal counsel, and/or was part of a deliberate strategy to deprive and/or obstruct Plaintiff’s rights.

1 the facts alleged in support thereof and, if applicable, citations to any pertinent provision of  
2 Supreme Court Rule 38, The Code of Judicial Conduct, (3) contain a verification by affidavit  
3 of any facts upon which the motion is grounded, unless the facts are apparent from the record  
4 or from the papers on file in the case, or are agreed to and stated in a writing signed by the  
5 parties or their attorneys, (4) except for good cause shown, be filed with the court by the  
6 appealing party with the notice of appeal or by another party within twenty (20) days of the  
7 filing of the appeal, and (5) certify the date or dates when the movant first became aware of  
8 the facts set forth in the motion.”  
9

10 3. Further, Rule 21A provides that if a motion for recusal is denied, the ruling “*shall be*  
11 supported by findings of fact with respect to the allegations in the motion.” See N.H. Supr.  
12 Ct. R. 21A. (emphasis added).  
13

14 4. In addition, that Court’s ruling on the motion “shall issue promptly.” *Id.*  
15

### 16 **BACKGROUND**

17 5. This is sixth (6) motion for recusal sought by Petitioner, of these Supreme Court Justices,  
18 since Appellant was unlawfully and nefariously strategized into becoming a *pro se* litigant,  
19 beginning in April of 2023. Defendant/Appellee PC Connection, Inc. (“Connection”) sought,  
20 through fraud and perjury, to deprive Appellant of his constitutional rights, commit fraud  
21 upon the Court, and purposefully defrauded the Court into issuing a preliminary injunction  
22 against Appellant in *PC Connection, Inc., v. Woodward-Griffith, et al*, Case No. 216-2023-  
23 CV-00220 (Hills. Super. North.) (“CV-220,” “the 2023 action”).  
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- 1 6. These prior motions for recusal, referenced above, were filed in Case No.'s 2024-0610,  
2 2024-0624, 2024-0678, 2024-0684, and 2024-0708 (N.H. Supr. Ct.)<sup>2</sup>, and were denied. See  
3 **Exhibit 1 – 5**, appended hereto. See also *Orders*, consolidated and appended hereto as  
4 **Exhibit 6**.
- 5
- 6 7. A seventh motion for recusal was filed by Appellant in an appeal taken from  
7 Defendant/Appellee Justice Anna Barbara Hantz Marconi's criminal trial, *State v. Anna*  
8 *Barbara Hantz Marconi*, Case No. 217-2024-CR-01167 (Merr. Super.) (N.H. Supreme Court  
9 Case No. 2024-0707). This recusal was granted, *however*, it was granted upon the Supreme  
10 Court's own motion, and/or upon Chief Justice MacDonald's motion/order, which declared  
11 Appellant's motion moot. See **Exhibit 7**, appended hereto; See also *Recusal Order*,  
12 appended hereto as **Exhibit 8**.
- 13
- 14 8. While Appellant's motions for recusal speak for themselves, summarized briefly, these  
15 motions endeavored to notice these Supreme Court Justices that by virtue of ratifying then-  
16 Justice Marconi's improper and unlawful denial in appeal Case No. 2023-0527 (N.H. Supr.  
17 Ct.), they had become material witnesses in Appellant's underlying civil action. See **Exh. 1 –**  
18 **5, 7**; See also N.H. Supr. Ct. R. 38, Canon 2, Rule 2.11(A)(5)(c); And see *Id.* at Comment  
19 [1], [2], [5].
- 20
- 21 9. Notably, the recusal orders following Appellant's motions for recusal failed to conform,  
22 and/or avoided confirming with, with Rule 21A, which requires that an order of recusal  
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28 <sup>2</sup> Where referenced, the full contents of the docket under New Hampshire Supreme Court Case Numbers are incorporated fully by reference herein.

1 “shall be supported with findings of fact with respect to the allegations contained in the  
2 motion.” See N.H. Supr. Ct. R. 21A.; See also **Exh. 6, 8**.

3  
4 10. Further, the recusal orders failed to comply, and/or knowingly<sup>3</sup> violated, Rule 2.11 of the  
5 Code of Judicial Conduct, where judges are required to recuse themselves in any matter  
6 where the judge’s impartiality might reasonably be questioned, and where the judge should  
7 disclose on the record information the judge believes the parties or their lawyers might  
8 reasonably consider relevant. In addition, judges are obligated to self-recuse whether *vel non*  
9 a motion for recusal is filed. See N.H. Supr. Ct. R. 38, Canon 2, Rule 2.11, “Comment” [1],  
10 [2], [5].  
11

12 11. By condoning then-Justice Marconi’s (and current Defendant/Appellee) improper and  
13 unlawful denial in appeal Case No. 2023-0527, and ratifying such order *en banc*, these  
14 Supreme Court Justices became party to then-Justice Marconi’s fraudulent denial, which is  
15 alleged to have been obtained by bribery, in the underlying legal action from which this  
16 appeal has been taken. Summarized briefly, the 2023-0527 appeal was taken from CV-220,  
17 which in totality was a contract enforcement action by now-Defendant/Appellee Connection.  
18

19 12. Under contract enforcement actions, the sole legal and fact question is whether *vel non* the  
20 employer, in this case Connection, had a valid and enforceable contract. As the trial court  
21 order being appealed in CV-220 (Supreme Court Case No. 2023-0527) determined  
22 Connection’s contract was valid and enforceable, despite a statutory challenge under a  
23 motion to dismiss from N.H. RSA 275:70-a, which included issuance of an injunction, and  
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<sup>3</sup> “Knowingly,” “knowledge,” “known,” and “knows” mean actual knowledge of the fact in question. A person’s knowledge may be inferred from circumstances. See N.H. Supr. Ct. R. 38, “TERMINOLOGY”

1 after only a preliminary hearing, it is well-settled law that Petitioner’s Rule 7 Mandatory  
2 appeal was properly before the court, was not “interlocutory” in character (*ergo* not a  
3 question of subject matter jurisdiction), and then-Justice Marconi had no power to invoke  
4 Supreme Court Rule 21(7) to dismiss Petitioner’s appeal without prejudice as  
5 “interlocutory.” See e.g. New England Backflow, Inc., v. Gagne, 172 N.H. 655 (2019)<sup>4</sup>; See  
6 also Exhibit 9, *Marconi 2023-0527 Order*, Exhibit 10, *En Banc Denial 2023-0527*.

8 13. As discussed in Appellant’s simultaneously filed *Motion to Vacate Justice Countway’s and*  
9 *This Supreme Court’s Orders On Grounds of Illegality and Serious Judicial Misconduct* (See  
10 current docket, 7-11-2025), rather than reversing the error and mitigating the damage caused  
11 by Defendant/Appellant and then-Justice Marconi’s illegality, bribery, and corruption, these  
12 Supreme Court Justices continued to ratify this serious judicial misconduct by virtue of  
13 continued improper denial of appeals on well-settled law, and refusing to recuse themselves  
14 when identified as material witnesses. See *Motion to Vacate...*, 7-11-2025, ¶¶ 11 – 14, pp. 4-  
15 5, 13 – 19.

17  
18 14. As result of this continued pattern of serious judicial misconduct, in this, and prior appeals,  
19 Appellant files this instant motion for recusal of these Supreme Court Justices, as these  
20 Supreme Court Justices are ***undisputably*** witnesses ***at minimum*** in Petitioner’s underlying  
21 civil cases, have engaged in a pattern of serious judicial misconduct and multiple breaches of  
22 the Code of Judicial Conduct, and engaged in actual impropriety, and have demonstrated  
23 probable cause to believe the appearance of impropriety, and illegality, exists. See *Motion to*  
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28 <sup>4</sup> As this is a motion for recusal, Appellant represents that a full analysis of the relevant law is not warranted, but also further, is not in dispute by any of the parties. However, without prejudice, Appellant reserves all rights to further expand in the face of any challenges. Crucially, Gagne undisputably establishes that a Rule 7 Mandatory Appeal under the *de novo* standard was proper.

1 *Vacate*, 7-11-2025, generally. Further, for purposes of Rule 21A, the facts and circumstances  
2 were not fully known until after July 1<sup>st</sup>, 2025, and therefore this motion shall be considered  
3 timely.  
4

5 **GROUND FOR RECUSAL**

6 15. **GROUND 1**: these Supreme Court Justices are material witnesses to Defendant/Appellee  
7 and then-Justice Marconi’s improper procedural dismissal, and breaches of the Code of  
8 Judicial Conduct, in denying Appellant’s appeals under Rule 21(7) of the Supreme Court.  
9 Stated simply, these Supreme Court Justices will be required, and compelled, to testify as to  
10 their actions, the propriety of same, and to the discussions and any materials that have been  
11 collected, or will be collected, for Appellant’s underlying civil claims. For example, and  
12 including but not limited to, answering as to why then-Justice Marconi was permitted to deny  
13 Appellant’s appeal under Case No. 2023-0527, sitting a solo justice, when the law  
14 concerning same was well-settled. It is hereby alleged, as alleged prior, that these Supreme  
15 Court Justices either were “duped” into breach of their duties by then-Justice Marconi, into  
16 foregoing *any review* of Appellant’s appeal under Case No. 2023-0527, and permitted their  
17 names to be signed by then-Justice Marconi, *when none of these Supreme Court Justices*  
18 *reviewed the appeal docket in Case No. 2023-0527*. In the alternative, these Supreme Court  
19 Justices will be required to testify as to their knowledge and involvement in the appeal under  
20 Case No. 2023-0527, and whether *vel non* then-Justice Marconi *forged* these Supreme Court  
21 Justices’ signatures to cover up Justice Marconi’s bribery, corruption, and fraudulent acts.  
22 See N.H. Supr. Ct. R. 38, Canon 1, Rule 1.1, 1.2; *Id.* at Canon 2, Rule 2.2, 2.5, 2.9, 2.11,  
23 2.12, 2.15.  
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1 16. **GROUND 2:** These Supreme Court Justices are material witnesses and will be required to  
2 testify as to their relationship and involvement with material witnesses and/or Defendants in  
3 Appellant’s underlying civil claims. By way of example, it is hereby alleged that these  
4 Supreme Court Justices all enjoy frequent contact with, and regular communications, with,  
5 including but not limited to, Defendant/Appellee Patricia Gallup, super-majority owner and  
6 Chairman of Defendant/Appellee Connection; Defendant/Appellee Christopher H.M. Carter,  
7 Esq.; then-Governor Chris Sununu, whom testified in conjunction with Defendant Marconi’s  
8 criminal trial leading to criminal charges; Steve Duprey, whom testified in conjunction with  
9 Defendant Marconi’s criminal trial leading to criminal charges; Defendant/Appellee Timothy  
10 McGrath, CEO of Defendant/Appellee Connection; and without limitation, any other  
11 John/Jane Does named in Appellant’s underlying complaint whose identities are unknown at  
12 present. Appellant respectfully reminds these Supreme Court Justices of their affirmative  
13 duties and obligations under Rule 2.11 of the Code of Judicial Conduct, and thereby,  
14 *specifically* notes these Supreme Court Justices of their *obligation* under Rule 2.11,  
15 “Comment” [5] – “A judge should disclose on the record information the judge believes the  
16 parties or their lawyers might reasonable consider relevant to a possible motion for  
17 disqualification, even if the judge believes there is no basis for disqualification.” See N.H.  
18 Supr. Ct. R. 38, Canon 2, Rule 2.9, 2.11, 2.15.

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23 17. **GROUND 3:** These Supreme Court Justices will be required to testify as to the propriety of  
24 their actions, including but not limited to: forcing Justice Countway to rule on *five (5)*  
25 *consecutive appeals of Appellant, and further inducing and/or allowing Justice Countway*  
26 *to improperly and unlawfully dismiss these appeals as a solo Justice under Rule 21(7).*

27 These Supreme Court Justices will be required to testify as to their involvement and actions  
28

1 concerning the ratification of such solo-Justice decisions by Justice Countway, and further,  
2 Justice Countway will be required to *specifically* testify as to her actions, knowledge, and  
3 belief concerning her actions as a solo-Justice, and any inducement and/or improper  
4 influence thereto. Further, Justice Countway will be specifically required to testify as to her  
5 appointment process to the Supreme Court, when, as is apparent from the records across all  
6 appeals involving Petitioner, and as outlined in Appellant’s *Motion to Vacate*, there is a  
7 substantial question of her qualification, fitness, and ability to act as a Supreme Court Justice.  
8 See Motion to Vacate..., 7-11-2025, e.g. pp. 13 – 16; See also N.H. Supr. Ct. R. 38, Canon 1,  
9 Rule 1.1, 2.1; Id. at Canon 2, Rule 2.2, 2.4, 2.5, 2.6, 2.7, 2.9, 2.11.

12 18. **GROUND 4:** Chief Justice MacDonald will be required to testify as to his management of  
13 the Supreme Court processes and procedures, including but not limited to how appeals are  
14 handled and prioritized, by the fact that recently obtained evidence by Appellant  
15 demonstrates that these Supreme Court Justices are improperly prioritizing appeals for  
16 dismissal; failing to follow and/or establish procedural standards and/or safeguards to ensure  
17 impartiality, integrity, and fairness among appeals concerning Appellant, and/or otherwise  
18 by, including but not limited to: inducing and/or allowing Justice Countway to rule on this  
19 present appeal, sitting as a solo justice, *in only six (6) days*, when Appellant’s appeal from  
20 Marconi’s criminal trial has been pending for over thirty (30) days, and crucially, Appellant’s  
21 *emergency motion* still remains without ruling on Appellant’s appeal in Marconi’s criminal  
22 case *fourteen (14) days later*. See Case No. 2025-0203, *Appel’t Emergency Motion for*  
23 *Stay...*, 6-30-2025; See Also Case No. 2025-0203, *Appel’t Obj. to Summ. Affirm., Appel’t*  
24 *Memo. Of Law, Appel’t Mot. for Summ. Reversal*, all 6-11-2025; See also N.H. Supr. Ct. R.  
25 38, Canon 1, Rule 1.1, 1.2; Id. at Canon 2, Rule 2.12, 2.15.

1 19. **GROUND 5:** These Supreme Court Justices will be required to testify as to why they failed  
2 to recuse themselves in all prior appeals involving Appellant, upon being notified that they  
3 were necessary witnesses. Further, these Supreme Court Justices will be required to testify as  
4 to why they were aware they needed to *sua sponte* recuse themselves on their own motion on  
5 Appellants *first* appeal from Marconi’s criminal case, and thereby declaring Appellant’s  
6 motion to recuse “moot.” See Case No. 2024-0707, *Order of Recusal*. They will further be  
7 required to testify as to why, when these Supreme Court Justices *knew* they had to recuse  
8 themselves from Appellant’s first appeal from Defendant/Appellee Marconi’s criminal trial,  
9 yet failed to honor their obligation to self-recuse in Appellant’s second appeal, Case No.  
10 2025-0203, in violation of Rule 2.11, “Comment” [2]. See N.H. Supr. Ct. R 38, Canon 2,  
11 Rule 2.2, 2.3, 2.11, 2.15.  
12

14 20. **GROUND 6:** These Supreme Court Justices will be required to testify as to why they  
15 violated Appellant’s constitutional rights, due process, equal protection, and/or otherwise, by,  
16 including but not limited to, forcing Appellant to continue to justify his Rule 7 Mandatory  
17 Appeals by mandating he submit a memorandum of law, when no other party was required  
18 to, and further, when, upon information and belief, *Appellant has been the only litigant in*  
19 *the prior three (3) years, at minimum, to have been required to file such memorandum of*  
20 *law*, and when *no other party to Petitioner’s appeals were compelled to file same*. See N.H.  
21 Supr. Ct. R. 38, Canon 1, Rule 1.1, 1.2; *Id.* at Canon 2, Rule 1.1, 1.2, 2.2, 2.3, 2.4, 2.7.  
22  
23

24 21. **GROUND 7:** These Supreme Court Justices will have to testify as to their actions and  
25 involvement relative to denying Appellant’s appeals, when these Justices were noticed by  
26 virtue of Petitioner’s *Motion to Reconsider En Banc* of the fraud upon the court, and  
27 submission of fraudulent evidence by opposing counsel, in appeal Case No. 2024-0678,  
28

1 and/or others, and as to why these Supreme Court Justices failed to take action to aid  
2 Petitioner, a *forced pro se litigant* through fraud and perjury. These are direct breaches of  
3 Code of Judicial Conduct Rules 2.2, 2.4, 2.6, 2.7, 2.9, 2.12, and 2.15, especially when  
4 Petitioner *directly* stated opposing counsel and Defendant/Appellee Connection's actions  
5 were a fraud upon the Court. Further, these Supreme Court Justices will be called to testify as  
6 to why they delayed, for three (3) months, to rule on Appellant's *Motion to Recon. En Banc*,  
7 when such action was an unsustainable exercise of discretion, especially in light of alleged  
8 and demonstrated fraud upon the court. See Case No. 2024-0678, *Mot. for Recon. En Banc*,  
9 also appended hereto as Exhibit 11, *Denied Order* as Exhibit 12; See also N.H. Supr. Ct. R.  
10 38, Canon 2, Rule 2.2, 2.4, 2.6, 2.7, 2.9, 2.12, 2.15.

13 22. **GROUND 8**: The actions, including but not limited to, as outlined herein, will require  
14 testimony from these Supreme Court Justices, and further – lends probable cause to believe  
15 these Supreme Court Justices knowingly and deliberately violated Appellant's rights,  
16 constitutional and/or otherwise, in direct violation of 42 U.S.C. §§ 1983 and/or 1985. As  
17 such, any refusal to recuse, and/or refusal to testify, and/or any other refusal to observe Code  
18 of Judicial Conduct results in an extinguishment of these Supreme Court Justices immunity  
19 from civil action and/or prosecution, exposes the State of New Hampshire and the Supreme  
20 Court to civil liability to the Appellant. By way of further example, evidence that has been  
21 recently obtained by the Appellant, and evidence already on the record in related and/or  
22 separate civil and/or criminal cases, lends probable cause to believe there is involvement  
23 between Chief Justice MacDonald, and/or these Supreme Court Justices, and then-Governor  
24 Sununu, Steve Duprey, Patricia Gallup, Tim McGrath, and/or others, to deliberately subvert,  
25 obstruct, delay, hinder, and/or interfere with the orderly administration of justice under the  
26  
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1 color of law, to deprive litigants of their rights, constitutional or otherwise – such as has  
2 happened here to Petitioner. Crucially, Defendant/Appellee Anna Barbara Hantz Marconi has  
3 spontaneously alleged the existence of a “vast judicial conspiracy” within her criminal trial,  
4 and in light of Petitioner’s *Motion to Vacate*, and the facts and circumstances as outlined  
5 herein, this lends ample probable cause to believe same. See N.H. Supr. Ct. R. 38, Canon 2,  
6 Rule 2.4, 2.9, 2.12, 2.15.  
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1 **CONCLUSION AND PRAYER FOR RELIEF**

2 These Supreme Court Justices and the Supreme Court *are hereby notified to preserve all*  
3 *documents, records, and things, without limitation to the definitions imposed thereby, both*  
4 *personal and governmental, in anticipation of further discovery and/or legal action.* Petitioner  
5 reserves all rights, including to amend and supplement, as facts, needs, and circumstance so  
6 dictate.  
7

8 **WHEREFORE**, without prejudice and without waiving any rights, Appellant  
9 respectfully requests that these Supreme Court Justices:  
10

- 11 a. **IMMEDIATELY RECUSE THEMSELVES** from this, and all further matters,  
12 concerning the Appellant, without limitation;
- 13 b. **ENTER AN ORDER PRESERVING ALL DOCUMENTS, RECORDS, AND**  
14 **THINGS, WITHOUT LIMITATION TO THE DEFINITIONS IMPOSED**  
15 **THEREBY, BOTH PERSONAL AND GOVERNMENTAL;**
- 16 c. **ACKNOWLEDGE AND TAKE ACTION** as to all obligations and duties imposed by  
17 the New Hampshire Code of Judicial Conduct, and/or otherwise, including but not  
18 limited to Rule 2.11 and Rule 2.15;
- 19 d. Any such further actions as are just, necessary, equitable, and proper, and in conformance  
20 with all applicable rules, laws, and procedures.  
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1 Respectfully submitted,

2 Dated this 14<sup>th</sup> of July, 2025.

3  
4 /s/Brok-Alan Woodward-Griffith

5 Brok-Alan Woodward-Griffith, *pro se*  
6 471 Silver Street, #105  
7 Manchester, NH, 03103  
8 [brokgrf@gmail.com](mailto:brokgrf@gmail.com)  
9 Ph: 603.325.0749

10 **CERTIFICATE OF SERVICE**

11 I hereby certify that a copy has been provided  
12 to all parties via the Court's eFile service.

13 /s/Brok-Alan Woodward-Griffith

14 **FACTUAL AVERMENT**

15 I, Brok-Alan Woodward-Griffith of  
16 Manchester, NH, hereby make oath and  
17 swear that the facts, allegations, and exhibits  
18 contained and/or referenced herein are true  
19 and accurate to the best of my knowledge,  
20 belief, and ability, without waiving the right  
21 to amend same as facts and circumstances so  
22 dictate. Further affiant sayeth naught.

23 /s/Brok-Alan Woodward-Griffith

# EXHIBIT 1

STATE OF NEW HAMPSHIRE

SUPREME COURT

PC CONNECTION INC., D/B/A  
CONNECTION,

Plaintiff, Appellee

vs.

BROK-ALAN WOODWARD-GRIFFITH, ET  
AL,

Defendant, Appellant

Case No.: 2024-0610 – APPEAL BY RIGHT

MOTION TO RECUSE JUSTICES  
COUNTWAY, MCDONALD, DONOVAN  
AND BASSET

Pursuant to N.H. Supr. Ct. R. 1 and 21A, Appellant/Defendant Brok-Alan Woodward-Griffith (“Griffith”) hereby respectfully moves for the recusal of Justice Countway, Justice MacDonald, Justice Donovan and Justice Basset. It is with the utmost respect to these four Justices, and great reluctance, that Griffith makes such motion. Griffith’s belief is that Justice Marconi is tainted, and/or improperly influenced by Appellee PC Connection, Inc. (“Connection”), and with skullduggerous intent, played upon an inherent prejudice of *pro se* litigants to cause this Honorable Court to deny, *en banc*, Griffith’s first Supreme Court appeal (Case No. 2023-0527). Griffith hereby makes such motion in the best interest of justice, to protect this Honorable Court and legal system from impropriety, or the appearance of same. Griffith also hereby moves, under Rule 1, to prevent manifest injustice, for suspension of the ordinary rules governing Rule 21A, including the tolling of time therein. Without prejudice, and without waiving any rights, Griffith humbly and respectfully states in support as follows.

**GROUND FOR RECUSAL**

1. **GROUND 1:** Appellant Griffith is implicitly and inextricably linked to Justice Marconi, vis-à-vis her criminal trial pending Merrimack Superior Court, Docket No. 217-2024-CR-

1 01167. Additionally, that case is also inextricably linked to this instant appeal, and PC  
2 Connection, Inc., and/or Patricia Gallup, by virtue of the allegations against Justice  
3 Marconi, and the fact that she does not dispute those same allegations at present.  
4 Moreover, Justice Marconi has indicated that Chief Justice MacDonald “gave his  
5 blessing” to Justice Marconi to meet with Sununu to squash the investigation into her  
6 husband. As these allegations, and Justice Marconi’s agreement with those allegations,  
7 are damning, and the current Justices named in this instant motion have *recused*  
8 themselves from sitting on matters involving Justice Marconi, recusal is proper. (Case  
9 No. LD-2024-0014, October 23<sup>rd</sup>, 2024 Order)  
10  
11

12 2. **GROUND 2:** Justice Marconi improperly denied Griffith’s first appeal in this instant  
13 action (Supr. Ct. Case No. 2023-0527), and successfully convinced the Justices sitting at  
14 that time to deny Griffith’s Motion for Reconsideration *en banc*. While Griffith believes  
15 this is due to skullduggery undertaken by Marconi, and an intentional and willful  
16 deception to the Justices at that time (MacDonald, Basset, Hicks, Donovan), playing upon  
17 the legal profession’s disdain for *pro se* litigants, and withholding material facts from  
18 those same justices, this is nonetheless a display of prejudice towards a *pro se* litigant,  
19 and a breach of the impartiality and fairness all judges must display towards all litigants,  
20 and a breach of the Judicial Code of Conduct. Moreover, as Justice Marconi sought, and  
21 gained the support of, the Justice *en banc* to deny Griffith’s Motion for Reconsideration  
22 on Supr. Ct. Case No. 2023-0527, recusal is proper for Justices MacDonald, Basset, and  
23 Donovan.  
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26 3. **GROUND 3:** Justice Countway denied this instant appeal, sitting as single Justice, along  
27 the same lines that Justice Marconi denied Griffith’s first appeal. Upon information and  
28

1 belief, this had led to a complaint to the Judicial Conduct Committee, specifically for  
2 Justice Countway’s action taken herein. Moreover, the circumstances surrounding both  
3 denials are suspicious, and appear to be a larger strategy taken by Connection to deceive,  
4 and/or signal to, the Justices to deny certain appeals of certain litigants. Attorney  
5 Christopher H.M. Carter, by and through his junior associate, Attorney Owen R. Graham,  
6 employed a similar strategy of utilizing “correspondences” to request Clerk Gudas to  
7 “administratively deny” Griffith’s first appeal – a power which, to Griffith’s knowledge  
8 and belief, Hon. Clerk Gudas does not possess under Supreme Court rules. This smacks  
9 of impropriety and gamesmanship, and seeks to exploit a significant and improper  
10 loophole under Supreme Court rules. As Justice Countway, upon information and belief,  
11 is subject to a Judicial Conduct Committee complaint and/or investigation in relation to  
12 her actions in this instant appeal, she cannot be impartial. Therefore, Justice Countway’s  
13 recusal is proper.

16  
17 4. **GROUND 4:** Justice Countway’s denial is just as improper as Justice Marconi’s, but for  
18 different reasons. It is well established precedent, and *stare decisis*, that litigants who’s  
19 claims have been dismissed for failure to state a claim, and/or for failure to properly  
20 plead (despite being given leave to amend) have an absolute right to a Rule 7 Mandatory  
21 appeal – moreover, as dictated by this unbroken line of reasoning, See e.g. ERG, Inc. v.  
22 Barnes, 137 N.H. 186, 189 (N.H. 1993), the only proper recourse for Griffith *was* a  
23 mandatory appeal. Therefore, recusal is proper.

24  
25 5. **GROUND 5:** No matter what happens, if the current sitting Justices choose to accept  
26 and/or act on the appeal, given the current state of Justice Marconi, and that she and her  
27 criminal case is inextricably linked to PC Connection, Inc. – the risk for claims of bias  
28

1 and impropriety are extremely high – especially with respect to PC Connection, Inc.  
2 claiming some kind of impropriety. Therefore, recusal is proper.

3 **PRAYER FOR RELIEF**

4 WHEREFORE, Defendant/Appellant Griffith humbly and respectfully requests that this  
5 Honorable Court:  
6

- 7 a. Recuse themselves from this instant appeal, as to Justice Countway, Justice Basset,  
8 Justice Donovan, and Chief Justice MacDonald;  
9  
10 b. Any such other relief as this Honorable Court deems just, necessary, and proper – and  
11 to prevent manifest injustice.

12 Respectfully submitted

13 Dated this 9<sup>th</sup> of December, 2024.

14 /s/Brok-Alan Woodward-Griffith

15 

---

Brok-Alan Woodward-Griffith, *pro se*

16 471 Silver Street, #105  
17 Manchester, NH, 03103  
18 [brokgrf@gmail.com](mailto:brokgrf@gmail.com)  
19 Ph: 603.325.0749

20 **CERTIFICATE OF SERVICE**

21 I hereby certify that a copy has been provided  
22 to all parties of record the Court's eFile  
23 service.

24 /s/Brok-Alan Woodward-Griffith

25 **FACTUAL AVERMENT**

26 I hereby make oath and say that all factual  
27 allegations presented herein are true and  
28 accurate to the best of my knowledge, belief,  
and ability.

/s/Brok-Alan Woodward-Griffith

# EXHIBIT 2

STATE OF NEW HAMPSHIRE

SUPREME COURT

PC CONNECTION, INC., D/B/A CONNECTION,  
PLAINTIFF, APPELLEE

Case No.: 2024-0624

vs.

AMY LUONGO,  
DEFENDANT

MOTION TO RECUSE JUSTICES  
COUNTWAY, MCDONALD, DONOVAN  
AND BASSET

Pursuant to N.H. Supr. Ct. R. 1, 21A, and 38, Appellant/Intervenor Brok-Alan Woodward-Griffith (“Griffith”) hereby respectfully moves for the recusal of Justice Countway, Justice MacDonald, Justice Donovan and Justice Basset. It is with the utmost respect to these four Justices, and great reluctance, that Griffith makes such motion. Griffith’s belief is that Justice Marconi is tainted, and/or improperly influenced by PC Connection, Inc. (“Connection”), and that the investigation made into Marconi by the New Hampshire Department of Justice uncovered material and admissible evidence in connection with Griffith’s simultaneously pending case, PC Connection v. Woodward-Griffith, et al, currently on appeal, and a related case with Connection, State of New Hampshire v. Anna Barbara Hantz Marconi, also currently on appeal. Griffith hereby makes such motion in the best interest of justice, to prevent manifest injustice, and to protect this Honorable Court and legal system from impropriety, or the appearance of same. Without prejudice, and without waiving any rights, Griffith states in support as follows.

**GROUND FOR RECUSAL**

1. **GROUND 1:** Appellant Griffith is implicitly and inextricably linked to Justice Marconi, vis-à-vis her criminal trial pending Merrimack Superior Court, Docket No. 217-2024-CR-01167. Additionally, that case is also inextricably linked to PC Connection, Inc., and/or Patricia

1 Gallup, by virtue of the allegations against Justice Marconi, and the fact that she does not  
2 dispute those same allegations at present. Moreover, that case is presently under N.H.  
3 Supreme Court appeal (Case No. 2024-0707), also with a motion to recuse. As specious as  
4 this allegation may be, that Chief Justice MacDonald “gave his blessing” to Justice Marconi  
5 to meet with Sununu to squash the investigation into her husband, it must be given credence,  
6 and such an act would be improper. Moreover, given that the current sitting justices have  
7 *recused* themselves from sitting on matters involving Justice Marconi, presumptively  
8 because of such allegation, (Case No. LD-2024-0014, October 23<sup>rd</sup>, 2024 Order) (See N.H.  
9 Supr. Ct. R. 38, CANON 2, Rule. 2.11) Furthermore, on or around January 15<sup>th</sup>, 2025, the  
10 sitting Supreme Court Justices recused themselves from Griffith’s appeal involving Justice  
11 Marconi (Supr. Ct. Case No. 2024-0707, January 15<sup>th</sup>, 2025 Order). This suggests a  
12 fundamental breakdown of the impartiality of the Court, and as the nexus between Justice  
13 Marconi, Griffith, and PC Connection is far too close for comfort, recusal is proper.  
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16  
17 2. **GROUND 2:** Justice Marconi improperly denied Griffith’s first appeal in this instant action  
18 (Supr. Ct. Case No. 2023-0527), and successfully convinced the Justices sitting at that time  
19 to deny Griffith’s Motion for Reconsideration *en banc*. While Griffith alleges this is due to  
20 skullduggery undertaken by Marconi, and an intentional and willful deception of the Justices  
21 at that time (MacDonald, Basset, Hicks, Donovan), playing upon the legal profession’s  
22 disdain for *pro se* litigants, this is nonetheless a display of prejudice towards Appellant  
23 Griffith, and a breach of the impartiality and fairness **all** members of the judiciary must  
24 display towards **all** litigants, and therefore a breach of the Judicial Code of Conduct.  
25

26 Moreover, as Justice Marconi sought, and gained the support of, the Justices *en banc* to deny  
27  
28

1 Griffith's Motion for Reconsideration on Supr. Ct. Case No. 2023-0527, recusal is proper for  
2 Justices MacDonald, Basset, and Donovan.

- 3 3. **GROUND 3:** Justice Countway, a newcomer to the Supreme Court bench, **in exactly the**  
4 **same fashion** to Justice Marconi's conduct on Case No. 2023-0527, denied Griffith's appeal  
5 in Case No. 2024-0610, of which reconsideration has now been denied *en banc* by the  
6 current sitting Justices. Moreover, the denials by both Justice Marconi and Justice Countway  
7 occurred after counsel for Plaintiff/Appellant PC Connection Inc., Christopher H.M. Carter  
8 and/or Owen Graham, filed "correspondences" to Hon. Clerk Gudas, asking to the clerk to  
9 "administratively deny" Griffith's appeals and "interlocutory" – a power which, under  
10 Supreme Court rules, Hon. Clerk Gudas **is not believed to possess**. These actions by  
11 Appellant/Plaintiff and/or counsel for same smacks of impropriety and gamesmanship, seek  
12 to improperly exploit loopholes in N.H. Supreme Court Rules, and give the appearance that  
13 Plaintiff/Appellant PC Connection was seeking to improperly "signal" to the Supreme Court  
14 justices to deprive Griffith of his rights, constitutional rights, and/or due process rights.  
15 Moreover, it is alleged that Plaintiff PC Connection, Inc., Patricia Gallup, and/or agents and  
16 operatives acting on her behalf, made personal outreach to Justice Marconi, and/or Justice  
17 Countway, instructing them to deny Griffith's appeal. As Justice Countway acted in a  
18 similarly improper manner to Justice Marconi, improperly denying Griffith's appeals in Case  
19 No. 2023-0527 and 2024-0610, and the members of the sitting Supreme Court supported  
20 such decisions *en banc*, this is *prima facie* appearance of impropriety, and full recusal of the  
21 Justices is proper.  
22  
23 4. **GROUND 4:** No matter what happens, if the current sitting Justices choose to accept and/or  
24 continue to act on this appeal - the risk for claims of bias and/or impropriety are extremely  
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1 high – especially with respect to PC Connection, Inc., Appellant Griffith, and/or Justice  
2 Marconi claiming some kind of impropriety – whether bias against Justice Marconi and PC  
3 Connection, due to the conduct as alleged, under oath, by Griffith – or to Griffith himself,  
4 based on the past repeated conduct by the Supreme Court. “The rule[s] also “reflect a broad  
5 concern that the administration of justice not only be fair, but also appear fair...” the  
6 traditional and primary rationales for the rule[s] are the *protection of the legal system from*  
7 *the appearance of impropriety.*” McElroy v. Gaffney, 129 NH 382, 389 (1987) (emphasis  
8 added); See also Snow’s Case, 140 NH 618, 624 (1996), discussing the “appearance of  
9 impropriety” is paramount, whether or not actual impropriety exists; See Hilliard v. Beattie,  
10 58 NH 112, 113 (1877), “Not only is it essential to the preservation of the rights of all that  
11 there shall be an impartial administration of justice... *it is also of almost if no[t] quite equal*  
12 *importance that every person shall feel that he has had such a trial. That he will not so feel*  
13 *when probably grounds exist to believe the contrary, is beyond dispute.*” Therefore, full  
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1 **PRAYER FOR RELIEF**

2 WHEREFORE, Defendant/Appellant Griffith, without prejudice and without waiving any  
3 rights, humbly and respectfully requests that this Honorable Court:  
4

- 5 a. Recuse themselves from this instant appeal, as to Justice Countway, Justice Basset,
- 6 Justice Donovan, and Chief Justice MacDonald;
- 7 b. Any such other relief as this Honorable Court deems just, necessary, and proper – and
- 8 to prevent manifest injustice.

9 Respectfully submitted,

10 Dated this 20<sup>th</sup> of January, 2025.

12 /s/Brok-Alan Woodward-Griffith

13 

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Brok-Alan Woodward-Griffith, *pro se*

14 471 Silver Street, #105  
15 Manchester, NH, 03103  
16 [brokgrf@gmail.com](mailto:brokgrf@gmail.com)  
17 Ph: 603.325.0749

18 **CERTIFICATE OF SERVICE**

19 I hereby certify that a copy has been provided  
20 to all parties of record the Court’s eFile  
21 service.

22 /s/Brok-Alan Woodward-Griffith

23 **FACTUAL AVERMENT**

24 I hereby make oath and say that all factual  
25 allegations presented herein are true and  
26 accurate to the best of my knowledge, belief,  
27 and ability.

28 /s/Brok-Alan Woodward-Griffith

# EXHIBIT 3

STATE OF NEW HAMPSHIRE

SUPREME COURT

PC CONNECTION, INC., D/B/A CONNECTION,  
PLAINTIFF, APPELLEE

Case No.: 2024-0678

vs.

BROK-ALAN WOODWARD-GRIFFITH, ET AL,  
DEFENDANT, APPELLANT

MOTION TO RECUSE JUSTICES  
COUNTWAY, MCDONALD, DONOVAN  
AND BASSET

Pursuant to N.H. Supr. Ct. R. 1, 21A, and 38, Appellant/Intervenor Brok-Alan Woodward-Griffith (“Griffith”) hereby respectfully moves for the recusal of Justice Countway, Justice MacDonald, Justice Donovan and Justice Basset. It is with the utmost respect to these four Justices, and great reluctance, that Griffith makes such motion. Griffith’s belief is that Justice Marconi is tainted, and/or improperly influenced by PC Connection, Inc. (“Connection”), and that the investigation made into Marconi by the New Hampshire Department of Justice uncovered material and admissible evidence in connection with Griffith’s simultaneously pending case, PC Connection v. Woodward-Griffith, et al, currently on appeal, and a related case with Connection, PC Connection v. Amy Luongo, also currently on appeal. Griffith hereby makes such motion in the best interest of justice, to prevent manifest injustice, and to protect this Honorable Court and legal system from impropriety, or the appearance of same. Without prejudice, and without waiving any rights, Griffith states in support as follows.

**GROUND FOR RECUSAL**

- GROUND 1:** Appellant Griffith is implicitly and inextricably linked to Justice Marconi, vis-à-vis her criminal trial pending Merrimack Superior Court, Docket No. 217-2024-CR-01167. Additionally, that case is also inextricably linked to PC Connection, Inc., and/or Patricia Gallup, by virtue of the allegations against Justice Marconi, and the fact that she does not

1 dispute those same allegations at present. Moreover, that case is presently under N.H.  
2 Supreme Court appeal (Case No. 2024-0707), also with a motion to recuse. As specious as  
3 this allegation may be, that Chief Justice MacDonald “gave his blessing” to Justice Marconi  
4 to meet with Sununu to squash the investigation into her husband, it must be given credence,  
5 and such an act would be improper. Moreover, given that the current sitting justices have  
6 *recused* themselves from sitting on matters involving Justice Marconi, presumptively  
7 because of such allegation, recusal is proper. (Case No. LD-2024-0014, October 23<sup>rd</sup>, 2024  
8 Order) (See N.H. Supr. Ct. R. 38, CANON 2, Rule. 2.11)  
9

10  
11 2. **GROUND 2:** Justice Marconi improperly denied Griffith’s first appeal in this instant action  
12 (Supr. Ct. Case No. 2023-0527), and successfully convinced the Justices sitting at that time  
13 to deny Griffith’s Motion for Reconsideration *en banc*. While Griffith alleges this is due to  
14 skullduggery undertaken by Marconi, and an intentional and willful deception of the Justices  
15 at that time (MacDonald, Basset, Hicks, Donovan), playing upon the legal profession’s  
16 disdain for *pro se* litigants, this is nonetheless a display of prejudice towards Appellant  
17 Griffith, and a breach of the impartiality and fairness **all** members of the judiciary must  
18 display towards **all** litigants, and therefore a breach of the Judicial Code of Conduct.  
19 Moreover, as Justice Marconi sought, and gained the support of, the Justices *en banc* to deny  
20 Griffith’s Motion for Reconsideration on Supr. Ct. Case No. 2023-0527, recusal is proper for  
21 Justices MacDonald, Basset, and Donovan.  
22

23  
24 3. **GROUND 3:** Justice Countway, a newcomer to the Supreme Court bench, **in exactly the**  
25 **same fashion** to Justice Marconi’s conduct on Case No. 2023-0527, denied Griffith’s appeal  
26 in Case No. 2024-0610, of which reconsideration has now been denied *en banc* by the  
27 current sitting Justices. Moreover, the denials by both Justice Marconi and Justice Countway  
28

1 occurred after counsel for Plaintiff/Appellant PC Connection Inc., Christopher H.M. Carter  
2 and/or Owen Graham, filed “correspondences” to Hon. Clerk Gudas, asking to the clerk to  
3 “administratively deny” Griffith’s appeals and “interlocutory” – a power which, under  
4 Supreme Court rules, Hon. Clerk Gudas ***is not believed to possess***. These actions by  
5 Appellant/Plaintiff and/or counsel for same smacks of impropriety and gamesmanship, seek  
6 to improperly exploit loopholes in N.H. Supreme Court Rules, and give the appearance that  
7 Plaintiff/Appellant PC Connection was seeking to improperly “signal” to the Supreme Court  
8 justices to deprive Griffith of his rights, constitutional rights, and/or due process rights.  
9 Moreover, it is alleged that Plaintiff PC Connection, Inc., Patricia Gallup, and/or agents and  
10 operatives acting on her behalf, made personal outreach to Justice Marconi, and/or Justice  
11 Countway, instructing them to deny Griffith’s appeal. As Justice Countway acted in a  
12 similarly improper manner to Justice Marconi, improperly denying Griffith’s appeals in Case  
13 No. 2023-0527 and 2024-0610, and the members of the sitting Supreme Court supported  
14 such decisions *en banc*, this is *prima facie* appearance of impropriety, and full recusal of the  
15 Justices is proper.

- 16  
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18  
19 4. **GROUND 4:** No matter what happens, if the current sitting Justices choose to accept and/or  
20 act on this appeal - the risk for claims of bias and/or impropriety are extremely high –  
21 especially with respect to PC Connection, Inc., Appellant Griffith, and/or Justice Marconi  
22 claiming some kind of impropriety – whether bias against Justice Marconi and PC  
23 Connection, due to the conduct as alleged, under oath, by Griffith – or to Griffith himself,  
24 based on the past repeated conduct by the Supreme Court. “The rule[s] also “reflect a broad  
25 concern that the administration of justice not only be fair, but also appear fair...” the  
26 traditional and primary rationales for the rule[s] are the ***protection of the legal system from***  
27  
28

1 *the appearance of impropriety.*” McElroy v. Gaffney, 129 NH 382, 389 (1987) (emphasis  
2 added; See also Snow’s Case, 140 NH 618, 624 (1996), discussing the “appearance of  
3 impropriety” is paramount, whether or not actual impropriety exists)). Therefore, full recusal  
4 is proper.  
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1 **PRAYER FOR RELIEF**

2 WHEREFORE, Defendant/Appellant Griffith humbly and respectfully requests that this  
3 Honorable Court:

- 4 a. Recuse themselves from this instant appeal, as to Justice Countway, Justice Basset,
- 5 Justice Donovan, and Chief Justice MacDonald;
- 6
- 7 b. Any such other relief as this Honorable Court deems just, necessary, and proper – and
- 8 to prevent manifest injustice.

9 Respectfully submitted,

10 Dated this 23<sup>rd</sup> of December, 2024.

11  
12 /s/Brok-Alan Woodward-Griffith

13 

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Brok-Alan Woodward-Griffith, *pro se*

14 471 Silver Street, #105  
15 Manchester, NH, 03103  
16 [brokgrf@gmail.com](mailto:brokgrf@gmail.com)  
17 Ph: 603.325.0749

18 **CERTIFICATE OF SERVICE**

19 I hereby certify that a copy has been provided  
20 to all parties of record the Court’s eFile  
21 service.

22 /s/Brok-Alan Woodward-Griffith

23 **FACTUAL AVERMENT**

24 I hereby make oath and say that all factual  
25 allegations presented herein are true and  
26 accurate to the best of my knowledge, belief,  
27 and ability.

28 /s/Brok-Alan Woodward-Griffith

# EXHIBIT 4

STATE OF NEW HAMPSHIRE

SUPREME COURT

PC CONNECTION, INC., D/B/A CONNECTION,  
PLAINTIFF, APPELLEE

Case No.: 2024-0684

vs.

AMY LUONGO,  
DEFENDANT

MOTION TO RECUSE JUSTICES  
COUNTWAY, MCDONALD, DONOVAN  
AND BASSET

Pursuant to N.H. Supr. Ct. R. 1, 21A, and 38, Appellant/Intervenor Brok-Alan Woodward-Griffith (“Griffith”) hereby respectfully moves for the recusal of Justice Countway, Justice MacDonald, Justice Donovan and Justice Basset. It is with the utmost respect to these four Justices, and great reluctance, that Griffith makes such motion. Griffith’s belief is that Justice Marconi is tainted, and/or improperly influenced by PC Connection, Inc. (“Connection”), and that the investigation made into Marconi by the New Hampshire Department of Justice uncovered material and admissible evidence in connection with Griffith’s simultaneously pending case, PC Connection v. Woodward-Griffith, et al, currently on appeal, and a related case with Connection, State of New Hampshire v. Anna Barbara Hantz Marconi, also currently on appeal. Griffith hereby makes such motion in the best interest of justice, to prevent manifest injustice, and to protect this Honorable Court and legal system from impropriety, or the appearance of same. Without prejudice, and without waiving any rights, Griffith states in support as follows.

**GROUND FOR RECUSAL**

1. **GROUND 1:** Appellant Griffith is implicitly and inextricably linked to Justice Marconi, vis-à-vis her criminal trial pending Merrimack Superior Court, Docket No. 217-2024-CR-01167. Additionally, that case is also inextricably linked to PC Connection, Inc., and/or Patricia

1 Gallup, by virtue of the allegations against Justice Marconi, and the fact that she does not  
2 dispute those same allegations at present. Moreover, that case is presently under N.H.  
3 Supreme Court appeal (Case No. 2024-0707), also with a motion to recuse. As specious as  
4 this allegation may be, that Chief Justice MacDonald “gave his blessing” to Justice Marconi  
5 to meet with Sununu to squash the investigation into her husband, it must be given credence,  
6 and such an act would be improper. Moreover, given that the current sitting justices have  
7 *recused* themselves from sitting on matters involving Justice Marconi, presumptively  
8 because of such allegation, recusal is proper. (Case No. LD-2024-0014, October 23<sup>rd</sup>, 2024  
9 Order) (See N.H. Supr. Ct. R. 38, CANON 2, Rule. 2.11)

10  
11  
12 2. **GROUND 2:** Justice Marconi improperly denied Griffith’s first appeal in this instant action  
13 (Supr. Ct. Case No. 2023-0527), and successfully convinced the Justices sitting at that time  
14 to deny Griffith’s Motion for Reconsideration *en banc*. While Griffith alleges this is due to  
15 skullduggery undertaken by Marconi, and an intentional and willful deception of the Justices  
16 at that time (MacDonald, Basset, Hicks, Donovan), playing upon the legal profession’s  
17 disdain for *pro se* litigants, this is nonetheless a display of prejudice towards Appellant  
18 Griffith, and a breach of the impartiality and fairness **all** members of the judiciary must  
19 display towards **all** litigants, and therefore a breach of the Judicial Code of Conduct.  
20 Moreover, as Justice Marconi sought, and gained the support of, the Justices *en banc* to deny  
21 Griffith’s Motion for Reconsideration on Supr. Ct. Case No. 2023-0527, recusal is proper for  
22 Justices MacDonald, Basset, and Donovan.

23  
24  
25 3. **GROUND 3:** Justice Countway, a newcomer to the Supreme Court bench, **in exactly the**  
26 **same fashion** to Justice Marconi’s conduct on Case No. 2023-0527, denied Griffith’s appeal  
27 in Case No. 2024-0610, of which reconsideration has now been denied *en banc* by the  
28

1 current sitting Justices. Moreover, the denials by both Justice Marconi and Justice Countway  
2 occurred after counsel for Plaintiff/Appellant PC Connection Inc., Christopher H.M. Carter  
3 and/or Owen Graham, filed “correspondences” to Hon. Clerk Gudas, asking to the clerk to  
4 “administratively deny” Griffith’s appeals and “interlocutory” – a power which, under  
5 Supreme Court rules, Hon. Clerk Gudas ***is not believed to possess***. These actions by  
6 Appellant/Plaintiff and/or counsel for same smacks of impropriety and gamesmanship, seek  
7 to improperly exploit loopholes in N.H. Supreme Court Rules, and give the appearance that  
8 Plaintiff/Appellant PC Connection was seeking to improperly “signal” to the Supreme Court  
9 justices to deprive Griffith of his rights, constitutional rights, and/or due process rights.  
10  
11 Moreover, it is alleged that Plaintiff PC Connection, Inc., Patricia Gallup, and/or agents and  
12 operatives acting on her behalf, made personal outreach to Justice Marconi, and/or Justice  
13 Countway, instructing them to deny Griffith’s appeal. As Justice Countway acted in a  
14 similarly improper manner to Justice Marconi, improperly denying Griffith’s appeals in Case  
15 No. 2023-0527 and 2024-0610, and the members of the sitting Supreme Court supported  
16 such decisions *en banc*, this is *prima facie* appearance of impropriety, and full recusal of the  
17 Justices is proper.

- 18  
19  
20 4. **GROUND 4:** No matter what happens, if the current sitting Justices choose to accept and/or  
21 act on this appeal - the risk for claims of bias and/or impropriety are extremely high –  
22 especially with respect to PC Connection, Inc., Appellant Griffith, and/or Justice Marconi  
23 claiming some kind of impropriety – whether bias against Justice Marconi and PC  
24 Connection, due to the conduct as alleged, under oath, by Griffith – or to Griffith himself,  
25 based on the past repeated conduct by the Supreme Court. “The rule[s] also “reflect a broad  
26 concern that the administration of justice not only be fair, but also appear fair...” the  
27  
28

1 traditional and primary rationales for the rule[s] are the *protection of the legal system from*  
2 *the appearance of impropriety.*” McElroy v. Gaffney, 129 NH 382, 389 (1987) (emphasis  
3 added; See also Snow’s Case, 140 NH 618, 624 (1996), discussing the “appearance of  
4 impropriety” is paramount, whether or not actual impropriety exists)). Therefore, full recusal  
5 is proper.  
6

1  
2  
3 **PRAYER FOR RELIEF**

4 WHEREFORE, Defendant/Appellant Griffith, without prejudice and without waiving any  
5 rights, humbly and respectfully requests that this Honorable Court:

- 6 a. Recuse themselves from this instant appeal, as to Justice Countway, Justice Basset,  
7 Justice Donovan, and Chief Justice MacDonald;  
8 b. Any such other relief as this Honorable Court deems just, necessary, and proper – and  
9 to prevent manifest injustice.

10 Respectfully submitted,

11 Dated this 23<sup>rd</sup> of December, 2024.

12  
13 /s/Brok-Alan Woodward-Griffith

14 

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Brok-Alan Woodward-Griffith, *pro se*

15 471 Silver Street, #105  
16 Manchester, NH, 03103  
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18 Ph: 603.325.0749

19 **CERTIFICATE OF SERVICE**

20 I hereby certify that a copy has been provided  
21 to all parties of record the Court's eFile  
22 service.

23 /s/Brok-Alan Woodward-Griffith

24 **FACTUAL AVERMENT**

25 I hereby make oath and say that all factual  
26 allegations presented herein are true and  
27 accurate to the best of my knowledge, belief,  
28 and ability.

/s/Brok-Alan Woodward-Griffith

# EXHIBIT 5

STATE OF NEW HAMPSHIRE

SUPREME COURT

PC CONNECTION, INC., D/B/A  
CONNECTION,  
PLAINTIFF, APPELLEE

vs.

BROK-ALAN WOODWARD-GRIFFITH, ET  
AL,  
DEFENDANT, APPELLANT

Case No.: 2024-0708

MOTION TO RECUSE JUSTICES  
COUNTWAY, MCDONALD, DONOVAN  
AND BASSET

Pursuant to N.H. Supr. Ct. R. 1, 21A, and 38, Appellant/Intervenor Brok-Alan Woodward-Griffith (“Griffith”) hereby respectfully moves for the recusal of Justice Countway, Justice MacDonald, Justice Donovan and Justice Basset. It is with the utmost respect to these four Justices, and great reluctance, that Griffith makes such motion. Griffith’s belief is that Justice Marconi is tainted, and/or improperly influenced by PC Connection, Inc. (“Connection”), and that the investigation made into Marconi by the New Hampshire Department of Justice uncovered material and admissible evidence in connection with Griffith’s simultaneously pending case, PC Connection v. Woodward-Griffith, et al, currently on appeal, and a related case with Connection, State of New Hampshire v. Anna Barbara Hantz Marconi, also currently on appeal. Griffith hereby makes such motion in the best interest of justice, to prevent manifest injustice, and to protect this Honorable Court and legal system from impropriety, or the appearance of same. Without prejudice, and without waiving any rights, Griffith states in support as follows.

**GROUND FOR RECUSAL**

- 1
- 2 1. **GROUND 1:** Appellant Griffith is implicitly and inextricably linked to Justice Marconi, vis-
- 3 à-vis her criminal trial pending Merrimack Superior Court, Docket No. 217-2024-CR-01167.
- 4
- 5 Additionally, that case is also inextricably linked to PC Connection, Inc., and/or Patricia
- 6 Gallup, by virtue of the allegations against Justice Marconi, and the fact that she does not
- 7 dispute those same allegations at present. Moreover, that case is presently under N.H.
- 8 Supreme Court appeal (Case No. 2024-0707), also with a motion to recuse. As specious as
- 9 this allegation may be, that Chief Justice MacDonald “gave his blessing” to Justice Marconi
- 10 to meet with Sununu to squash the investigation into her husband, it must be given credence,
- 11 and such an act would be improper. Moreover, given that the current sitting justices have
- 12 *recused* themselves from sitting on matters involving Justice Marconi, presumptively
- 13 because of such allegation, recusal is proper. (Case No. LD-2024-0014, October 23<sup>rd</sup>, 2024
- 14 Order) (See N.H. Supr. Ct. R. 38, CANON 2, Rule. 2.11) (See also Case No. 2024-0707,
- 15 N.H. Supr. Ct. “Recusal of All Justices” January 15<sup>th</sup>, 2025)
- 16
- 17
- 18 2. **GROUND 2:** Justice Marconi improperly denied Griffith’s first appeal in this instant action
- 19 (Supr. Ct. Case No. 2023-0527), and successfully convinced the Justices sitting at that time
- 20 to deny Griffith’s Motion for Reconsideration *en banc*. While Griffith alleges this is due to
- 21 skullduggery undertaken by Marconi, and an intentional and willful deception of the Justices
- 22 at that time (MacDonald, Basset, Hicks, Donovan), playing upon the legal profession’s
- 23 disdain for *pro se* litigants, this is nonetheless a display of prejudice towards Appellant
- 24 Griffith, and a breach of the impartiality and fairness **all** members of the judiciary must
- 25 display towards **all** litigants, and therefore a breach of the Judicial Code of Conduct.
- 26
- 27 Moreover, as Justice Marconi sought, and gained the support of, the Justices *en banc* to deny
- 28

1 Griffith's Motion for Reconsideration on Supr. Ct. Case No. 2023-0527, recusal is proper for  
2 Justices MacDonald, Basset, and Donovan.

- 3 3. **GROUND 3:** Justice Countway, a newcomer to the Supreme Court bench, **in exactly the**  
4 **same fashion** to Justice Marconi's conduct on Case No. 2023-0527, denied Griffith's appeal  
5 in Case No. 2024-0610, of which reconsideration has now been denied *en banc* by the  
6 current sitting Justices. Moreover, the denials by both Justice Marconi and Justice Countway  
7 occurred after counsel for Plaintiff/Appellant PC Connection Inc., Christopher H.M. Carter  
8 and/or Owen Graham, filed "correspondences" to Hon. Clerk Gudas, asking to the clerk to  
9 "administratively deny" Griffith's appeals and "interlocutory" – a power which, under  
10 Supreme Court rules, Hon. Clerk Gudas **is not believed to possess**. These actions by  
11 Appellant/Plaintiff and/or counsel for same smacks of impropriety and gamesmanship, seek  
12 to improperly exploit loopholes in N.H. Supreme Court Rules, and give the appearance that  
13 Plaintiff/Appellant PC Connection was seeking to improperly "signal" to the Supreme Court  
14 justices to deprive Griffith of his rights, constitutional rights, and/or due process rights.  
15 Moreover, it is alleged that Plaintiff PC Connection, Inc., Patricia Gallup, and/or agents and  
16 operatives acting on her behalf, made personal outreach to Justice Marconi, and/or Justice  
17 Countway, instructing them to deny Griffith's appeal. As Justice Countway acted in a  
18 similarly improper manner to Justice Marconi, improperly denying Griffith's appeals in Case  
19 No. 2023-0527 and 2024-0610, and the members of the sitting Supreme Court supported  
20 such decisions *en banc*, this is *prima facie* appearance of impropriety, and full recusal of the  
21 Justices is proper.  
22  
23 4. **GROUND 4:** No matter what happens, if the current sitting Justices choose to accept and/or  
24 act on this appeal - the risk for claims of bias and/or impropriety are extremely high –  
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1 especially with respect to PC Connection, Inc., Appellant Griffith, and/or Justice Marconi  
2 claiming some kind of impropriety – whether bias against Justice Marconi and PC  
3 Connection, due to the conduct as alleged, under oath, by Griffith – or to Griffith himself,  
4 based on the past repeated conduct by the Supreme Court. “The rule[s] also “reflect a broad  
5 concern that the administration of justice not only be fair, but also appear fair...” the  
6 traditional and primary rationales for the rule[s] are the *protection of the legal system from*  
7 *the appearance of impropriety.*” McElroy v. Gaffney, 129 NH 382, 389 (1987) (emphasis  
8 added); See also Snow’s Case, 140 NH 618, 624 (1996), discussing the “appearance of  
9 impropriety” is paramount, whether or not actual impropriety exists; Hilliard v. Beattie, 58  
10 NH 112, 113 (1877), “Not only is it essential to the preservation of the rights of all that there  
11 shall be an impartial administration of justice... but it is also of almost no quite equal  
12 importance that every person shall feel that he has had such a trial. That he will not so feel  
13 when probable ground exists to the believe the contrary, is beyond dispute.” On the weight of  
14 these authorities, Griffith respectfully states that such grounds exist, as outlined above, and  
15 protection of the legal system is paramount. Therefore, full recusal is proper.  
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1 **PRAYER FOR RELIEF**

2 WHEREFORE, Defendant/Appellant Griffith, without prejudice and without waiving any  
3 rights, humbly and respectfully requests that this Honorable Court:  
4

- 5 a. Recuse themselves from this instant appeal, as to Justice Countway, Justice Basset,  
6 Justice Donovan, and Chief Justice MacDonald;
- 7 b. Any such other relief as this Honorable Court deems just, necessary, and proper – and  
8 to prevent manifest injustice.

9 Respectfully submitted,

10 Dated this 7<sup>th</sup> of February, 2025.

11  
12 /s/Brok-Alan Woodward-Griffith

13 

---

Brok-Alan Woodward-Griffith, *pro se*

14 471 Silver Street, #105  
15 Manchester, NH, 03103  
16 [brokgrf@gmail.com](mailto:brokgrf@gmail.com)  
17 Ph: 603.325.0749

18 **CERTIFICATE OF SERVICE**

19 I hereby certify that a copy has been provided  
20 to all parties of record the Court's eFile  
21 service.

22 /s/Brok-Alan Woodward-Griffith

23 **FACTUAL AVERMENT**

24 I hereby make oath and say that all factual  
25 allegations presented herein are true and  
26 accurate to the best of my knowledge, belief,  
27 and ability.

28 /s/Brok-Alan Woodward-Griffith

# EXHIBIT 6

**THE STATE OF NEW HAMPSHIRE**

**SUPREME COURT**

**In Case No. 2024-0610, PC Connection, Inc. v. Brok-Alan Woodward-Griffith & a., Chief Justice Gordon J. MacDonald on December 17, 2024, issued the following order:**

The appellant, Brok-Alan Woodward-Griffith, has requested that I recuse myself from further participation in this case for several reasons, including the court's issuance of decisions in this case and in a prior appeal that were contrary to the appellant's position.

Rule 2.11 of the Code of Judicial Conduct (Supreme Court Rule 38) provides: "A judge shall disqualify himself or herself in any proceeding in which the judge's impartiality might reasonably be questioned . . . ." Whether an appearance of impropriety exists is determined under an objective standard, *i.e.*, would a reasonable person, not the judge himself, question the impartiality of the court. Snow's Case, 140 N.H. 618, 624 (1996). The test for the appearance of partiality is an objective one, that is, whether an objective, disinterested observer, fully informed of the facts, would entertain significant doubt that justice would be done in this case. Taylor-Boren v. Isaac, 143 N.H. 261, 268 (1998); see also In the Matter of Tapply & Zukatis, 162 N.H. 285, 297 (2011).

"Judicial rulings alone almost never constitute a valid basis for a bias or partiality motion." State v. Bader, 148 N.H. 265, 271 (2002) (quotation and brackets omitted). "Adverse rulings against the [party] in the same or a prior judicial proceeding do not render the judge biased." Id. (quotation omitted)

A reasonable person, fully informed of the facts alleged by Brok-Alan Woodward-Griffith in his motion to recuse, would not question my impartiality in this case. I affirm that I have no bias in this case, and that I will decide it on the facts and the law. Accordingly, I have a responsibility to hear and decide this case. See Rule 2.7 of the Code of Judicial Conduct (Rule 38). Brok-Alan Woodward-Griffith's motion to recuse is denied.

This order is entered by Chief Justice MacDonald pursuant to Rule 21A.

**Timothy A. Gudas,  
Clerk**

Distribution:

Owen R. Graham, Esq.

Joshua D. Nadreau, Esq.

Gabriel Gladstone, Esq.

Daniel M. Deschenes, Esq.

Christopher H. M. Carter, Esq.

Brok-Alan Woodward-Griffith

File

**THE STATE OF NEW HAMPSHIRE**

**SUPREME COURT**

**In Case No. 2024-0610, PC Connection, Inc. v. Brok-Alan Woodward-Griffith & a., Justice James P. Bassett on December 17, 2024, issued the following order:**

The appellant, Brok-Alan Woodward-Griffith, has requested that I recuse myself from further participation in this case for several reasons, including the court's issuance of decisions in this case and in a prior appeal that were contrary to the appellant's position.

Rule 2.11 of the Code of Judicial Conduct (Supreme Court Rule 38) provides: "A judge shall disqualify himself or herself in any proceeding in which the judge's impartiality might reasonably be questioned . . . ." Whether an appearance of impropriety exists is determined under an objective standard, *i.e.*, would a reasonable person, not the judge himself, question the impartiality of the court. Snow's Case, 140 N.H. 618, 624 (1996). The test for the appearance of partiality is an objective one, that is, whether an objective, disinterested observer, fully informed of the facts, would entertain significant doubt that justice would be done in this case. Taylor-Boren v. Isaac, 143 N.H. 261, 268 (1998); see also In the Matter of Tapply & Zukatis, 162 N.H. 285, 297 (2011).

"Judicial rulings alone almost never constitute a valid basis for a bias or partiality motion." State v. Bader, 148 N.H. 265, 271 (2002) (quotation and brackets omitted). "Adverse rulings against the [party] in the same or a prior judicial proceeding do not render the judge biased." Id. (quotation omitted)

A reasonable person, fully informed of the facts alleged by Brok-Alan Woodward-Griffith in his motion to recuse, would not question my impartiality in this case. I affirm that I have no bias in this case, and that I will decide it on the facts and the law. Accordingly, I have a responsibility to hear and decide this case. See Rule 2.7 of the Code of Judicial Conduct (Rule 38). Brok-Alan Woodward-Griffith's motion to recuse is denied.

This order is entered by Justice Bassett pursuant to Rule 21A.

**Timothy A. Gudas,  
Clerk**

Distribution:

Owen R. Graham, Esq.

Joshua D. Nadreau, Esq.

Gabriel Gladstone, Esq.

Daniel M. Deschenes, Esq.

Christopher H. M. Carter, Esq.

Brok-Alan Woodward-Griffith

File

**THE STATE OF NEW HAMPSHIRE**

**SUPREME COURT**

**In Case No. 2024-0610, PC Connection, Inc. v. Brok-Alan Woodward-Griffith & a., Justice Melissa B. Countway on December 17, 2024, issued the following order:**

The appellant, Brok-Alan Woodward-Griffith, has requested that I recuse myself from further participation for several reasons, including the court’s issuance of decisions in this case and in a prior appeal that were contrary to the appellant’s position.

Rule 2.11 of the Code of Judicial Conduct (Supreme Court Rule 38) provides: “A judge shall disqualify himself or herself in any proceeding in which the judge’s impartiality might reasonably be questioned . . . .” Whether an appearance of impropriety exists is determined under an objective standard, *i.e.*, would a reasonable person, not the judge herself, question the impartiality of the court. Snow’s Case, 140 N.H. 618, 624 (1996). The test for the appearance of partiality is an objective one, that is, whether an objective, disinterested observer, fully informed of the facts, would entertain significant doubt that justice would be done in this case. Taylor-Boren v. Isaac, 143 N.H. 261, 268 (1998); see also In the Matter of Tapply & Zukatis, 162 N.H. 285, 297 (2011).

“Judicial rulings alone almost never constitute a valid basis for a bias or partiality motion.” State v. Bader, 148 N.H. 265, 271 (2002) (quotation and brackets omitted). “Adverse rulings against the [party] in the same or a prior judicial proceeding do not render the judge biased.” Id. (quotation omitted)

A reasonable person, fully informed of the facts alleged by Brok-Alan Woodward-Griffith in his motion to recuse, would not question my impartiality in this case. I affirm that I have no bias in this case, and that I will decide it on the facts and the law. Accordingly, I have a responsibility to hear and decide this case. See Rule 2.7 of the Code of Judicial Conduct (Rule 38). Brok-Alan Woodward-Griffith’s motion to recuse is denied.

This order is entered by Justice Countway pursuant to Rule 21A.

**Timothy A. Gudas,  
Clerk**

Distribution:

Owen R. Graham, Esq.

Joshua D. Nadreau, Esq.

Gabriel Gladstone, Esq.

Daniel M. Deschenes, Esq.

Christopher H. M. Carter, Esq.

Brok-Alan Woodward-Griffith

File

**THE STATE OF NEW HAMPSHIRE**

**SUPREME COURT**

**In Case No. 2024-0610, PC Connection, Inc. v. Brok-Alan Woodward-Griffith & a., Justice Patrick E. Donovan on December 17, 2024, issued the following order:**

The appellant, Brok-Alan Woodward-Griffith, has requested that I recuse myself from further participation in this case for several reasons, including the court's issuance of decisions in this case and in a prior appeal that were contrary to the appellant's position.

Rule 2.11 of the Code of Judicial Conduct (Supreme Court Rule 38) provides: "A judge shall disqualify himself or herself in any proceeding in which the judge's impartiality might reasonably be questioned . . . ." Whether an appearance of impropriety exists is determined under an objective standard, *i.e.*, would a reasonable person, not the judge himself, question the impartiality of the court. Snow's Case, 140 N.H. 618, 624 (1996). The test for the appearance of partiality is an objective one, that is, whether an objective, disinterested observer, fully informed of the facts, would entertain significant doubt that justice would be done in this case. Taylor-Boren v. Isaac, 143 N.H. 261, 268 (1998); see also In the Matter of Tapply & Zukatis, 162 N.H. 285, 297 (2011).

"Judicial rulings alone almost never constitute a valid basis for a bias or partiality motion." State v. Bader, 148 N.H. 265, 271 (2002) (quotation and brackets omitted). "Adverse rulings against the [party] in the same or a prior judicial proceeding do not render the judge biased." Id. (quotation omitted)

A reasonable person, fully informed of the facts alleged by Brok-Alan Woodward-Griffith in his motion to recuse, would not question my impartiality in this case. I affirm that I have no bias in this case, and that I will decide it on the facts and the law. Accordingly, I have a responsibility to hear and decide this case. See Rule 2.7 of the Code of Judicial Conduct (Rule 38). Brok-Alan Woodward-Griffith's motion to recuse is denied.

This order is entered by Justice Donovan pursuant to Rule 21A.

**Timothy A. Gudas,  
Clerk**

Distribution:

Owen R. Graham, Esq.

Joshua D. Nadreau, Esq.

Gabriel Gladstone, Esq.

Daniel M. Deschenes, Esq.

Christopher H. M. Carter, Esq.

Brok-Alan Woodward-Griffith

File

**THE STATE OF NEW HAMPSHIRE**

**SUPREME COURT**

**In Case No. 2024-0624, PC Connection, Inc. v. Amy Luongo, Chief Justice Gordon J. MacDonald on February 12, 2025, issued the following order:**

The appellant, Brok-Alan Woodward-Griffith, has requested that I recuse myself from further participation in this case for several reasons, including the court's issuance of decisions in prior appeals that were contrary to the appellant's position.

Rule 2.11 of the Code of Judicial Conduct (Supreme Court Rule 38) provides: "A judge shall disqualify himself or herself in any proceeding in which the judge's impartiality might reasonably be questioned . . ." This includes, for example, when the judge "has a personal bias or prejudice concerning a party or a party's lawyer, or personal knowledge of facts that are in dispute in the proceeding," or when the judge or a member of their family or household has an economic interest in the proceeding. *Id.* The test for the appearance of partiality is an objective one, that is, whether an objective, disinterested observer, fully informed of the facts, would entertain significant doubt that justice would be done in this case. *Taylor-Boren v. Isaac*, 143 N.H. 261, 268 (1998); see also In the Matter of Tapply & Zukatis, 162 N.H. 285, 297 (2011).

"Judicial rulings alone almost never constitute a valid basis for a bias or partiality motion." *State v. Bader*, 148 N.H. 265, 271 (2002) (quotation and brackets omitted). "Adverse rulings against the [party] in the same or a prior judicial proceeding do not render the judge biased." *Id.* (quotation omitted)

A reasonable person, fully informed of the facts alleged by Brok-Alan Woodward-Griffith in his motion to recuse, would not question my impartiality in this case. I affirm that I have no bias in this case, and that I will decide it on the facts and the law. Accordingly, I have a responsibility to hear and decide this case. See Rule 2.7 of the Code of Judicial Conduct (Rule 38). Brok-Alan Woodward-Griffith's motion to recuse is denied.

This order is entered by Chief Justice MacDonald pursuant to Rule 21A.

**Timothy A. Gudas,  
Clerk**

Distribution:  
Brok-Alan Woodward-Griffith  
Samuel H. Martin, Esquire  
Amy Luongo  
File

**THE STATE OF NEW HAMPSHIRE**

**SUPREME COURT**

**In Case No. 2024-0624, PC Connection, Inc. v. Amy Luongo, Justice James P. Bassett on February 12, 2025, issued the following order:**

The appellant, Brok-Alan Woodward-Griffith, has requested that I recuse myself from further participation in this case for several reasons, including the court's issuance of decisions in prior appeals that were contrary to the appellant's position.

Rule 2.11 of the Code of Judicial Conduct (Supreme Court Rule 38) provides: "A judge shall disqualify himself or herself in any proceeding in which the judge's impartiality might reasonably be questioned . . ." This includes, for example, when the judge "has a personal bias or prejudice concerning a party or a party's lawyer, or personal knowledge of facts that are in dispute in the proceeding," or when the judge or a member of their family or household has an economic interest in the proceeding. *Id.* The test for the appearance of partiality is an objective one, that is, whether an objective, disinterested observer, fully informed of the facts, would entertain significant doubt that justice would be done in this case. *Taylor-Boren v. Isaac*, 143 N.H. 261, 268 (1998); see also In the Matter of Tapply & Zukatis, 162 N.H. 285, 297 (2011).

"Judicial rulings alone almost never constitute a valid basis for a bias or partiality motion." *State v. Bader*, 148 N.H. 265, 271 (2002) (quotation and brackets omitted). "Adverse rulings against the [party] in the same or a prior judicial proceeding do not render the judge biased." *Id.* (quotation omitted)

A reasonable person, fully informed of the facts alleged by Brok-Alan Woodward-Griffith in his motion to recuse, would not question my impartiality in this case. I affirm that I have no bias in this case, and that I will decide it on the facts and the law. Accordingly, I have a responsibility to hear and decide this case. See Rule 2.7 of the Code of Judicial Conduct (Rule 38). Brok-Alan Woodward-Griffith's motion to recuse is denied.

This order is entered by Justice Bassett pursuant to Rule 21A.

**Timothy A. Gudas,  
Clerk**

Distribution:  
Brok-Alan Woodward-Griffith  
Samuel H. Martin, Esquire  
Amy Luongo  
File

**THE STATE OF NEW HAMPSHIRE**

**SUPREME COURT**

**In Case No. 2024-0624, PC Connection, Inc. v. Amy Luongo, Justice Melissa B. Countway on February 12, 2025, issued the following order:**

The appellant, Brok-Alan Woodward-Griffith, has requested that I recuse myself from further participation in this case for several reasons, including the court's issuance of decisions in prior appeals that were contrary to the appellant's position.

Rule 2.11 of the Code of Judicial Conduct (Supreme Court Rule 38) provides: "A judge shall disqualify himself or herself in any proceeding in which the judge's impartiality might reasonably be questioned . . ." This includes, for example, when the judge "has a personal bias or prejudice concerning a party or a party's lawyer, or personal knowledge of facts that are in dispute in the proceeding," or when the judge or a member of their family or household has an economic interest in the proceeding. *Id.* The test for the appearance of partiality is an objective one, that is, whether an objective, disinterested observer, fully informed of the facts, would entertain significant doubt that justice would be done in this case. *Taylor-Boren v. Isaac*, 143 N.H. 261, 268 (1998); see also *In the Matter of Tapply & Zukatis*, 162 N.H. 285, 297 (2011).

"Judicial rulings alone almost never constitute a valid basis for a bias or partiality motion." *State v. Bader*, 148 N.H. 265, 271 (2002) (quotation and brackets omitted). "Adverse rulings against the [party] in the same or a prior judicial proceeding do not render the judge biased." *Id.* (quotation omitted)

A reasonable person, fully informed of the facts alleged by Brok-Alan Woodward-Griffith in his motion to recuse, would not question my impartiality in this case. I affirm that I have no bias in this case, and that I will decide it on the facts and the law. Accordingly, I have a responsibility to hear and decide this case. See Rule 2.7 of the Code of Judicial Conduct (Rule 38). Brok-Alan Woodward-Griffith's motion to recuse is denied.

This order is entered by Justice Countway pursuant to Rule 21A.

**Timothy A. Gudas,  
Clerk**

Distribution:  
Brok-Alan Woodward-Griffith  
Samuel H. Martin, Esquire  
Amy Luongo  
File

**THE STATE OF NEW HAMPSHIRE**

**SUPREME COURT**

**In Case No. 2024-0624, PC Connection, Inc. v. Amy Luongo, Justice Patrick E. Donovan on February 12, 2025, issued the following order:**

The appellant, Brok-Alan Woodward-Griffith, has requested that I recuse myself from further participation in this case for several reasons, including the court's issuance of decisions in prior appeals that were contrary to the appellant's position.

Rule 2.11 of the Code of Judicial Conduct (Supreme Court Rule 38) provides: "A judge shall disqualify himself or herself in any proceeding in which the judge's impartiality might reasonably be questioned . . ." This includes, for example, when the judge "has a personal bias or prejudice concerning a party or a party's lawyer, or personal knowledge of facts that are in dispute in the proceeding," or when the judge or a member of their family or household has an economic interest in the proceeding. *Id.* The test for the appearance of partiality is an objective one, that is, whether an objective, disinterested observer, fully informed of the facts, would entertain significant doubt that justice would be done in this case. *Taylor-Boren v. Isaac*, 143 N.H. 261, 268 (1998); see also *In the Matter of Tapply & Zukatis*, 162 N.H. 285, 297 (2011).

"Judicial rulings alone almost never constitute a valid basis for a bias or partiality motion." *State v. Bader*, 148 N.H. 265, 271 (2002) (quotation and brackets omitted). "Adverse rulings against the [party] in the same or a prior judicial proceeding do not render the judge biased." *Id.* (quotation omitted)

A reasonable person, fully informed of the facts alleged by Brok-Alan Woodward-Griffith in his motion to recuse, would not question my impartiality in this case. I affirm that I have no bias in this case, and that I will decide it on the facts and the law. Accordingly, I have a responsibility to hear and decide this case. See Rule 2.7 of the Code of Judicial Conduct (Rule 38). Brok-Alan Woodward-Griffith's motion to recuse is denied.

This order is entered by Justice Donovan pursuant to Rule 21A.

**Timothy A. Gudas,  
Clerk**

Distribution:  
Brok-Alan Woodward-Griffith  
Samuel H. Martin, Esquire  
Amy Luongo  
File

**THE STATE OF NEW HAMPSHIRE**

**SUPREME COURT**

**In Case No. 2024-0678, PC Connection, Inc. v. Brok-Alan Woodward-Griffith & a., Chief Justice Gordon J. MacDonald on February 12, 2025, issued the following order:**

The appellant, Brok-Alan Woodward-Griffith, has requested that I recuse myself from further participation in this case for several reasons, including the court's issuance of decisions in prior appeals that were contrary to the appellant's position.

Rule 2.11 of the Code of Judicial Conduct (Supreme Court Rule 38) provides: "A judge shall disqualify himself or herself in any proceeding in which the judge's impartiality might reasonably be questioned . . ." This includes, for example, when the judge "has a personal bias or prejudice concerning a party or a party's lawyer, or personal knowledge of facts that are in dispute in the proceeding," or when the judge or a member of their family or household has an economic interest in the proceeding. *Id.* The test for the appearance of partiality is an objective one, that is, whether an objective, disinterested observer, fully informed of the facts, would entertain significant doubt that justice would be done in this case. *Taylor-Boren v. Isaac*, 143 N.H. 261, 268 (1998); see also In the Matter of Tapply & Zukatis, 162 N.H. 285, 297 (2011).

"Judicial rulings alone almost never constitute a valid basis for a bias or partiality motion." *State v. Bader*, 148 N.H. 265, 271 (2002) (quotation and brackets omitted). "Adverse rulings against the [party] in the same or a prior judicial proceeding do not render the judge biased." *Id.* (quotation omitted)

A reasonable person, fully informed of the facts alleged by Brok-Alan Woodward-Griffith in his motion to recuse, would not question my impartiality in this case. I affirm that I have no bias in this case, and that I will decide it on the facts and the law. Accordingly, I have a responsibility to hear and decide this case. See Rule 2.7 of the Code of Judicial Conduct (Rule 38). Brok-Alan Woodward-Griffith's motion to recuse is denied.

This order is entered by Chief Justice MacDonald pursuant to Rule 21A.

**Timothy A. Gudas,  
Clerk**

Distribution:

Owen R. Graham, Esq.

Joshua D. Nadreau, Esq.

Gabriel Gladstone, Esq.

Christopher H. M. Carter, Esq.

Brok-Alan Woodward-Griffith

File

**THE STATE OF NEW HAMPSHIRE**

**SUPREME COURT**

**In Case No. 2024-0678, PC Connection, Inc. v. Brok-Alan Woodward-Griffith & a., Justice James P. Bassett on February 12, 2025, issued the following order:**

The appellant, Brok-Alan Woodward-Griffith, has requested that I recuse myself from further participation in this case for several reasons, including the court's issuance of decisions in prior appeals that were contrary to the appellant's position.

Rule 2.11 of the Code of Judicial Conduct (Supreme Court Rule 38) provides: "A judge shall disqualify himself or herself in any proceeding in which the judge's impartiality might reasonably be questioned . . ." This includes, for example, when the judge "has a personal bias or prejudice concerning a party or a party's lawyer, or personal knowledge of facts that are in dispute in the proceeding," or when the judge or a member of their family or household has an economic interest in the proceeding. *Id.* The test for the appearance of partiality is an objective one, that is, whether an objective, disinterested observer, fully informed of the facts, would entertain significant doubt that justice would be done in this case. *Taylor-Boren v. Isaac*, 143 N.H. 261, 268 (1998); see also In the Matter of Tapply & Zukatis, 162 N.H. 285, 297 (2011).

"Judicial rulings alone almost never constitute a valid basis for a bias or partiality motion." *State v. Bader*, 148 N.H. 265, 271 (2002) (quotation and brackets omitted). "Adverse rulings against the [party] in the same or a prior judicial proceeding do not render the judge biased." *Id.* (quotation omitted)

A reasonable person, fully informed of the facts alleged by Brok-Alan Woodward-Griffith in his motion to recuse, would not question my impartiality in this case. I affirm that I have no bias in this case, and that I will decide it on the facts and the law. Accordingly, I have a responsibility to hear and decide this case. See Rule 2.7 of the Code of Judicial Conduct (Rule 38). Brok-Alan Woodward-Griffith's motion to recuse is denied.

This order is entered by Justice Bassett pursuant to Rule 21A.

**Timothy A. Gudas,  
Clerk**

Distribution:

Owen R. Graham, Esq.

Joshua D. Nadreau, Esq.

Gabriel Gladstone, Esq.

Christopher H. M. Carter, Esq.

Brok-Alan Woodward-Griffith

File

**THE STATE OF NEW HAMPSHIRE**

**SUPREME COURT**

**In Case No. 2024-0678, PC Connection, Inc. v. Brok-Alan Woodward-Griffith & a., Justice Melissa B. Countway on February 12, 2025, issued the following order:**

The appellant, Brok-Alan Woodward-Griffith, has requested that I recuse myself from further participation in this case for several reasons, including the court's issuance of decisions in prior appeals that were contrary to the appellant's position.

Rule 2.11 of the Code of Judicial Conduct (Supreme Court Rule 38) provides: "A judge shall disqualify himself or herself in any proceeding in which the judge's impartiality might reasonably be questioned . . ." This includes, for example, when the judge "has a personal bias or prejudice concerning a party or a party's lawyer, or personal knowledge of facts that are in dispute in the proceeding," or when the judge or a member of their family or household has an economic interest in the proceeding. *Id.* The test for the appearance of partiality is an objective one, that is, whether an objective, disinterested observer, fully informed of the facts, would entertain significant doubt that justice would be done in this case. *Taylor-Boren v. Isaac*, 143 N.H. 261, 268 (1998); see also *In the Matter of Tapply & Zukatis*, 162 N.H. 285, 297 (2011).

"Judicial rulings alone almost never constitute a valid basis for a bias or partiality motion." *State v. Bader*, 148 N.H. 265, 271 (2002) (quotation and brackets omitted). "Adverse rulings against the [party] in the same or a prior judicial proceeding do not render the judge biased." *Id.* (quotation omitted)

A reasonable person, fully informed of the facts alleged by Brok-Alan Woodward-Griffith in his motion to recuse, would not question my impartiality in this case. I affirm that I have no bias in this case, and that I will decide it on the facts and the law. Accordingly, I have a responsibility to hear and decide this case. See Rule 2.7 of the Code of Judicial Conduct (Rule 38). Brok-Alan Woodward-Griffith's motion to recuse is denied.

This order is entered by Justice Countway pursuant to Rule 21A.

**Timothy A. Gudas,  
Clerk**

Distribution:

Owen R. Graham, Esq.

Joshua D. Nadreau, Esq.

Gabriel Gladstone, Esq.

Christopher H. M. Carter, Esq.

Brok-Alan Woodward-Griffith

File

**THE STATE OF NEW HAMPSHIRE**

**SUPREME COURT**

**In Case No. 2024-0678, PC Connection, Inc. v. Brok-Alan Woodward-Griffith & a., Justice Patrick E. Donovan on February 12, 2025, issued the following order:**

The appellant, Brok-Alan Woodward-Griffith, has requested that I recuse myself from further participation in this case for several reasons, including the court's issuance of decisions in prior appeals that were contrary to the appellant's position.

Rule 2.11 of the Code of Judicial Conduct (Supreme Court Rule 38) provides: "A judge shall disqualify himself or herself in any proceeding in which the judge's impartiality might reasonably be questioned . . . ." This includes, for example, when the judge "has a personal bias or prejudice concerning a party or a party's lawyer, or personal knowledge of facts that are in dispute in the proceeding," or when the judge or a member of their family or household has an economic interest in the proceeding. *Id.* The test for the appearance of partiality is an objective one, that is, whether an objective, disinterested observer, fully informed of the facts, would entertain significant doubt that justice would be done in this case. Taylor-Boren v. Isaac, 143 N.H. 261, 268 (1998); see also In the Matter of Tapply & Zukatis, 162 N.H. 285, 297 (2011).

"Judicial rulings alone almost never constitute a valid basis for a bias or partiality motion." State v. Bader, 148 N.H. 265, 271 (2002) (quotation and brackets omitted). "Adverse rulings against the [party] in the same or a prior judicial proceeding do not render the judge biased." *Id.* (quotation omitted)

A reasonable person, fully informed of the facts alleged by Brok-Alan Woodward-Griffith in his motion to recuse, would not question my impartiality in this case. I affirm that I have no bias in this case, and that I will decide it on the facts and the law. Accordingly, I have a responsibility to hear and decide this case. See Rule 2.7 of the Code of Judicial Conduct (Rule 38). Brok-Alan Woodward-Griffith's motion to recuse is denied.

This order is entered by Justice Donovan pursuant to Rule 21A.

**Timothy A. Gudas,  
Clerk**

Distribution:

Owen R. Graham, Esq.

Joshua D. Nadreau, Esq.

Gabriel Gladstone, Esq.

Christopher H. M. Carter, Esq.

Brok-Alan Woodward-Griffith

File

**THE STATE OF NEW HAMPSHIRE**

**SUPREME COURT**

**In Case No. 2024-0684, PC Connection, Inc. v. Amy Luongo,  
the Chief Justice Gordon J. MacDonald on February 12, 2025,  
issued the following order:**

The appellant, Brok-Alan Woodward-Griffith, has requested that I recuse myself from further participation in this case for several reasons, including the court's issuance of decisions in prior appeals that were contrary to the appellant's position.

Rule 2.11 of the Code of Judicial Conduct (Supreme Court Rule 38) provides: "A judge shall disqualify himself or herself in any proceeding in which the judge's impartiality might reasonably be questioned . . ." This includes, for example, when the judge "has a personal bias or prejudice concerning a party or a party's lawyer, or personal knowledge of facts that are in dispute in the proceeding," or when the judge or a member of their family or household has an economic interest in the proceeding. *Id.* The test for the appearance of partiality is an objective one, that is, whether an objective, disinterested observer, fully informed of the facts, would entertain significant doubt that justice would be done in this case. *Taylor-Boren v. Isaac*, 143 N.H. 261, 268 (1998); see also In the Matter of Tapply & Zukatis, 162 N.H. 285, 297 (2011).

"Judicial rulings alone almost never constitute a valid basis for a bias or partiality motion." *State v. Bader*, 148 N.H. 265, 271 (2002) (quotation and brackets omitted). "Adverse rulings against the [party] in the same or a prior judicial proceeding do not render the judge biased." *Id.* (quotation omitted)

A reasonable person, fully informed of the facts alleged by Brok-Alan Woodward-Griffith in his motion to recuse, would not question my impartiality in this case. I affirm that I have no bias in this case, and that I will decide it on the facts and the law. Accordingly, I have a responsibility to hear and decide this case. See Rule 2.7 of the Code of Judicial Conduct (Rule 38). Brok-Alan Woodward-Griffith's motion to recuse is denied.

This order is entered by Chief Justice MacDonald pursuant to Rule 21A.

**Timothy A. Gudas,  
Clerk**

Distribution:  
Brok-Alan Woodward-Griffith  
Samuel H. Martin, Esquire  
Amy Luongo  
File

**THE STATE OF NEW HAMPSHIRE**

**SUPREME COURT**

**In Case No. 2024-0684, PC Connection, Inc. v. Amy Luongo, Justice James P. Bassett on February 12, 2025, issued the following order:**

The appellant, Brok-Alan Woodward-Griffith, has requested that I recuse myself from further participation in this case for several reasons, including the court's issuance of decisions in prior appeals that were contrary to the appellant's position.

Rule 2.11 of the Code of Judicial Conduct (Supreme Court Rule 38) provides: "A judge shall disqualify himself or herself in any proceeding in which the judge's impartiality might reasonably be questioned . . ." This includes, for example, when the judge "has a personal bias or prejudice concerning a party or a party's lawyer, or personal knowledge of facts that are in dispute in the proceeding," or when the judge or a member of their family or household has an economic interest in the proceeding. *Id.* The test for the appearance of partiality is an objective one, that is, whether an objective, disinterested observer, fully informed of the facts, would entertain significant doubt that justice would be done in this case. *Taylor-Boren v. Isaac*, 143 N.H. 261, 268 (1998); see also In the Matter of Tapply & Zukatis, 162 N.H. 285, 297 (2011).

"Judicial rulings alone almost never constitute a valid basis for a bias or partiality motion." *State v. Bader*, 148 N.H. 265, 271 (2002) (quotation and brackets omitted). "Adverse rulings against the [party] in the same or a prior judicial proceeding do not render the judge biased." *Id.* (quotation omitted)

A reasonable person, fully informed of the facts alleged by Brok-Alan Woodward-Griffith in his motion to recuse, would not question my impartiality in this case. I affirm that I have no bias in this case, and that I will decide it on the facts and the law. Accordingly, I have a responsibility to hear and decide this case. See Rule 2.7 of the Code of Judicial Conduct (Rule 38). Brok-Alan Woodward-Griffith's motion to recuse is denied.

This order is entered by Justice Bassett pursuant to Rule 21A.

**Timothy A. Gudas,  
Clerk**

Distribution:  
Brok-Alan Woodward-Griffith  
Samuel H. Martin, Esquire  
Amy Luongo  
File

**THE STATE OF NEW HAMPSHIRE**

**SUPREME COURT**

**In Case No. 2024-0684, PC Connection, Inc. v. Amy Luongo, Justice Melissa B. Countway on February 12, 2025, issued the following order:**

The appellant, Brok-Alan Woodward-Griffith, has requested that I recuse myself from further participation in this case for several reasons, including the court's issuance of decisions in prior appeals that were contrary to the appellant's position.

Rule 2.11 of the Code of Judicial Conduct (Supreme Court Rule 38) provides: "A judge shall disqualify himself or herself in any proceeding in which the judge's impartiality might reasonably be questioned . . ." This includes, for example, when the judge "has a personal bias or prejudice concerning a party or a party's lawyer, or personal knowledge of facts that are in dispute in the proceeding," or when the judge or a member of their family or household has an economic interest in the proceeding. *Id.* The test for the appearance of partiality is an objective one, that is, whether an objective, disinterested observer, fully informed of the facts, would entertain significant doubt that justice would be done in this case. Taylor-Boren v. Isaac, 143 N.H. 261, 268 (1998); see also In the Matter of Tapply & Zukatis, 162 N.H. 285, 297 (2011).

"Judicial rulings alone almost never constitute a valid basis for a bias or partiality motion." State v. Bader, 148 N.H. 265, 271 (2002) (quotation and brackets omitted). "Adverse rulings against the [party] in the same or a prior judicial proceeding do not render the judge biased." *Id.* (quotation omitted)

A reasonable person, fully informed of the facts alleged by Brok-Alan Woodward-Griffith in his motion to recuse, would not question my impartiality in this case. I affirm that I have no bias in this case, and that I will decide it on the facts and the law. Accordingly, I have a responsibility to hear and decide this case. See Rule 2.7 of the Code of Judicial Conduct (Rule 38). Brok-Alan Woodward-Griffith's motion to recuse is denied.

This order is entered by Justice Countway pursuant to Rule 21A.

**Timothy A. Gudas,  
Clerk**

Distribution:  
Brok-Alan Woodward-Griffith  
Samuel H. Martin, Esquire  
Amy Luongo  
File

**THE STATE OF NEW HAMPSHIRE**

**SUPREME COURT**

**In Case No. 2024-0684, PC Connection, Inc. v. Amy Luongo, Justice Patrick E. Donovan on February 12, 2025, issued the following order:**

The appellant, Brok-Alan Woodward-Griffith, has requested that I recuse myself from further participation in this case for several reasons, including the court's issuance of decisions in prior appeals that were contrary to the appellant's position.

Rule 2.11 of the Code of Judicial Conduct (Supreme Court Rule 38) provides: "A judge shall disqualify himself or herself in any proceeding in which the judge's impartiality might reasonably be questioned . . ." This includes, for example, when the judge "has a personal bias or prejudice concerning a party or a party's lawyer, or personal knowledge of facts that are in dispute in the proceeding," or when the judge or a member of their family or household has an economic interest in the proceeding. *Id.* The test for the appearance of partiality is an objective one, that is, whether an objective, disinterested observer, fully informed of the facts, would entertain significant doubt that justice would be done in this case. *Taylor-Boren v. Isaac*, 143 N.H. 261, 268 (1998); see also In the Matter of Tapply & Zukatis, 162 N.H. 285, 297 (2011).

"Judicial rulings alone almost never constitute a valid basis for a bias or partiality motion." *State v. Bader*, 148 N.H. 265, 271 (2002) (quotation and brackets omitted). "Adverse rulings against the [party] in the same or a prior judicial proceeding do not render the judge biased." *Id.* (quotation omitted)

A reasonable person, fully informed of the facts alleged by Brok-Alan Woodward-Griffith in his motion to recuse, would not question my impartiality in this case. I affirm that I have no bias in this case, and that I will decide it on the facts and the law. Accordingly, I have a responsibility to hear and decide this case. See Rule 2.7 of the Code of Judicial Conduct (Rule 38). Brok-Alan Woodward-Griffith's motion to recuse is denied.

This order is entered by Justice Donovan pursuant to Rule 21A.

**Timothy A. Gudas,  
Clerk**

Distribution:  
Brok-Alan Woodward-Griffith  
Samuel H. Martin, Esquire  
Amy Luongo  
File

**THE STATE OF NEW HAMPSHIRE**

**SUPREME COURT**

**In Case No. 2024-0708, PC Connection, Inc. v. Brok-Alan Woodward-Griffith & a., Chief Justice Gordon J. MacDonald on February 12, 2025, issued the following order:**

The appellant, Brok-Alan Woodward-Griffith, has requested that I recuse myself from further participation in this case for several reasons, including the court's issuance of decisions in prior appeals that were contrary to the appellant's position.

Rule 2.11 of the Code of Judicial Conduct (Supreme Court Rule 38) provides: "A judge shall disqualify himself or herself in any proceeding in which the judge's impartiality might reasonably be questioned . . ." This includes, for example, when the judge "has a personal bias or prejudice concerning a party or a party's lawyer, or personal knowledge of facts that are in dispute in the proceeding," or when the judge or a member of their family or household has an economic interest in the proceeding. *Id.* The test for the appearance of partiality is an objective one, that is, whether an objective, disinterested observer, fully informed of the facts, would entertain significant doubt that justice would be done in this case. *Taylor-Boren v. Isaac*, 143 N.H. 261, 268 (1998); see also In the Matter of Tapply & Zukatis, 162 N.H. 285, 297 (2011).

"Judicial rulings alone almost never constitute a valid basis for a bias or partiality motion." *State v. Bader*, 148 N.H. 265, 271 (2002) (quotation and brackets omitted). "Adverse rulings against the [party] in the same or a prior judicial proceeding do not render the judge biased." *Id.* (quotation omitted)

A reasonable person, fully informed of the facts alleged by Brok-Alan Woodward-Griffith in his motion to recuse, would not question my impartiality in this case. I affirm that I have no bias in this case, and that I will decide it on the facts and the law. Accordingly, I have a responsibility to hear and decide this case. See Rule 2.7 of the Code of Judicial Conduct (Rule 38). Brok-Alan Woodward-Griffith's motion to recuse is denied.

This order is entered by Chief Justice MacDonald pursuant to Rule 21A.

**Timothy A. Gudas,  
Clerk**

Distribution:

Owen R. Graham, Esq.

Joshua D. Nadreau, Esq.

Gabriel Gladstone, Esq.

Christopher H. M. Carter, Esq.

Brok-Alan Woodward-Griffith

File

**THE STATE OF NEW HAMPSHIRE**

**SUPREME COURT**

**In Case No. 2024-0708, PC Connection, Inc. v. Brok-Alan Woodward-Griffith & a., Justice James P. Bassett on February 12, 2025, issued the following order:**

The appellant, Brok-Alan Woodward-Griffith, has requested that I recuse myself from further participation in this case for several reasons, including the court's issuance of decisions in prior appeals that were contrary to the appellant's position.

Rule 2.11 of the Code of Judicial Conduct (Supreme Court Rule 38) provides: "A judge shall disqualify himself or herself in any proceeding in which the judge's impartiality might reasonably be questioned . . . ." This includes, for example, when the judge "has a personal bias or prejudice concerning a party or a party's lawyer, or personal knowledge of facts that are in dispute in the proceeding," or when the judge or a member of their family or household has an economic interest in the proceeding. *Id.* The test for the appearance of partiality is an objective one, that is, whether an objective, disinterested observer, fully informed of the facts, would entertain significant doubt that justice would be done in this case. *Taylor-Boren v. Isaac*, 143 N.H. 261, 268 (1998); see also In the Matter of Tapply & Zukatis, 162 N.H. 285, 297 (2011).

"Judicial rulings alone almost never constitute a valid basis for a bias or partiality motion." *State v. Bader*, 148 N.H. 265, 271 (2002) (quotation and brackets omitted). "Adverse rulings against the [party] in the same or a prior judicial proceeding do not render the judge biased." *Id.* (quotation omitted)

A reasonable person, fully informed of the facts alleged by Brok-Alan Woodward-Griffith in his motion to recuse, would not question my impartiality in this case. I affirm that I have no bias in this case, and that I will decide it on the facts and the law. Accordingly, I have a responsibility to hear and decide this case. See Rule 2.7 of the Code of Judicial Conduct (Rule 38). Brok-Alan Woodward-Griffith's motion to recuse is denied.

This order is entered by Justice Bassett pursuant to Rule 21A.

**Timothy A. Gudas,  
Clerk**

Distribution:

Owen R. Graham, Esq.

Joshua D. Nadreau, Esq.

Gabriel Gladstone, Esq.

Christopher H. M. Carter, Esq.

Brok-Alan Woodward-Griffith

File

**THE STATE OF NEW HAMPSHIRE**

**SUPREME COURT**

**In Case No. 2024-0708, PC Connection, Inc. v. Brok-Alan Woodward-Griffith & a., Justice Melissa B. Countway on February 12, 2025, issued the following order:**

The appellant, Brok-Alan Woodward-Griffith, has requested that I recuse myself from further participation in this case for several reasons, including the court's issuance of decisions in prior appeals that were contrary to the appellant's position.

Rule 2.11 of the Code of Judicial Conduct (Supreme Court Rule 38) provides: "A judge shall disqualify himself or herself in any proceeding in which the judge's impartiality might reasonably be questioned . . ." This includes, for example, when the judge "has a personal bias or prejudice concerning a party or a party's lawyer, or personal knowledge of facts that are in dispute in the proceeding," or when the judge or a member of their family or household has an economic interest in the proceeding. *Id.* The test for the appearance of partiality is an objective one, that is, whether an objective, disinterested observer, fully informed of the facts, would entertain significant doubt that justice would be done in this case. *Taylor-Boren v. Isaac*, 143 N.H. 261, 268 (1998); see also *In the Matter of Tapply & Zukatis*, 162 N.H. 285, 297 (2011).

"Judicial rulings alone almost never constitute a valid basis for a bias or partiality motion." *State v. Bader*, 148 N.H. 265, 271 (2002) (quotation and brackets omitted). "Adverse rulings against the [party] in the same or a prior judicial proceeding do not render the judge biased." *Id.* (quotation omitted)

A reasonable person, fully informed of the facts alleged by Brok-Alan Woodward-Griffith in his motion to recuse, would not question my impartiality in this case. I affirm that I have no bias in this case, and that I will decide it on the facts and the law. Accordingly, I have a responsibility to hear and decide this case. See Rule 2.7 of the Code of Judicial Conduct (Rule 38). Brok-Alan Woodward-Griffith's motion to recuse is denied.

This order is entered by Justice Countway pursuant to Rule 21A.

**Timothy A. Gudas,  
Clerk**

Distribution:

Owen R. Graham, Esq.

Joshua D. Nadreau, Esq.

Gabriel Gladstone, Esq.

Christopher H. M. Carter, Esq.

Brok-Alan Woodward-Griffith

File

**THE STATE OF NEW HAMPSHIRE**

**SUPREME COURT**

**In Case No. 2024-0708, PC Connection, Inc. v. Brok-Alan Woodward-Griffith & a., Justice Patrick E. Donovan on February 12, 2025, issued the following order:**

The appellant, Brok-Alan Woodward-Griffith, has requested that I recuse myself from further participation in this case for several reasons, including the court's issuance of decisions in prior appeals that were contrary to the appellant's position.

Rule 2.11 of the Code of Judicial Conduct (Supreme Court Rule 38) provides: "A judge shall disqualify himself or herself in any proceeding in which the judge's impartiality might reasonably be questioned . . ." This includes, for example, when the judge "has a personal bias or prejudice concerning a party or a party's lawyer, or personal knowledge of facts that are in dispute in the proceeding," or when the judge or a member of their family or household has an economic interest in the proceeding. *Id.* The test for the appearance of partiality is an objective one, that is, whether an objective, disinterested observer, fully informed of the facts, would entertain significant doubt that justice would be done in this case. *Taylor-Boren v. Isaac*, 143 N.H. 261, 268 (1998); see also *In the Matter of Tapply & Zukatis*, 162 N.H. 285, 297 (2011).

"Judicial rulings alone almost never constitute a valid basis for a bias or partiality motion." *State v. Bader*, 148 N.H. 265, 271 (2002) (quotation and brackets omitted). "Adverse rulings against the [party] in the same or a prior judicial proceeding do not render the judge biased." *Id.* (quotation omitted)

A reasonable person, fully informed of the facts alleged by Brok-Alan Woodward-Griffith in his motion to recuse, would not question my impartiality in this case. I affirm that I have no bias in this case, and that I will decide it on the facts and the law. Accordingly, I have a responsibility to hear and decide this case. See Rule 2.7 of the Code of Judicial Conduct (Rule 38). Brok-Alan Woodward-Griffith's motion to recuse is denied.

This order is entered by Justice Donovan pursuant to Rule 21A.

**Timothy A. Gudas,  
Clerk**

Distribution:

Owen R. Graham, Esq.

Joshua D. Nadreau, Esq.

Gabriel Gladstone, Esq.

Christopher H. M. Carter, Esq.

Brok-Alan Woodward-Griffith

File

# EXHIBIT 7

1  
2 STATE OF NEW HAMPSHIRE

3 SUPREME COURT

4 STATE OF NEW HAMPSHIRE,

Case No.: UNASSIGNED AT PRESENT

5 vs.

6 ANNA BARBARA HANTZ MARCONI,

MOTION TO RECUSE JUSTICES  
COUNTWAY, MCDONALD, DONOVAN  
AND BASSET

7  
8 Pursuant to N.H. Supr. Ct. R. 1 and 21A, Appellant/Intervenor Brok-Alan Woodward-  
9 Griffith (“Griffith”) hereby respectfully moves for the recusal of Justice Countway, Justice  
10 MacDonald, Justice Donovan and Justice Basset. It is with the utmost respect to these four  
11 Justices, and great reluctance, that Griffith makes such motion. Griffith’s belief is that Justice  
12 Marconi is tainted, and/or improperly influenced by PC Connection, Inc. (“Connection”), and  
13 that the investigation made into Marconi by the New Hampshire Department of Justice  
14 uncovered material and admissible evidence in connection with Griffith’s simultaneously  
15 pending case, PC Connection v. Woodward-Griffith, et al. Griffith hereby makes such motion in  
16 the best interest of justice, to prevent manifest injustice, and to protect this Honorable Court and  
17 legal system from impropriety, or the appearance of same. Without prejudice, and without  
18 waiving any rights, Griffith humbly and respectfully states in support as follows.  
19  
20  
21

22 **GROUND FOR RECUSAL**

- 23 1. **GROUND 1:** Appellant Griffith is implicitly and inextricably linked to Justice Marconi,  
24 vis-à-vis her criminal trial pending Merrimack Superior Court, Docket No. 217-2024-CR-  
25 01167, of which this instant appeal arises. Additionally, that case is also inextricably  
26 linked to PC Connection, Inc., and/or Patricia Gallup, by virtue of the allegations against  
27 Justice Marconi, and the fact that she does not dispute those same allegations at present.  
28

1 As specious as this allegation may be, Justice Marconi has indicated that Chief Justice  
2 MacDonald “gave his blessing” to Justice Marconi to meet with Sununu to squash the  
3 investigation into her husband. Given that the current sitting justices have *recused*  
4 themselves from sitting on matters involving Justice Marconi, presumptively because of  
5 such allegation, recusal is proper. (Case No. LD-2024-0014, October 23<sup>rd</sup>, 2024 Order)

- 7 2. **GROUND 2:** No matter what happens, if the current sitting Justices choose to accept  
8 and/or act on this appeal - the risk for claims of bias and/or impropriety are extremely  
9 high – especially with respect to PC Connection, Inc. and/or Justice Marconi claiming  
10 some kind of impropriety. Therefore, recusal is proper.

11  
12 **PRAYER FOR RELIEF**

13 WHEREFORE, Defendant/Appellant Griffith humbly and respectfully requests that this  
14 Honorable Court:

- 15 a. Recuse themselves from this instant appeal, as to Justice Countway, Justice Basset,  
16 Justice Donovan, and Chief Justice MacDonald;  
17  
18 b. Any such other relief as this Honorable Court deems just, necessary, and proper – and  
19 to prevent manifest injustice.

20 Respectfully submitted

21 Dated this 19<sup>th</sup> of December, 2024.

22  
23 /s/Brok-Alan Woodward-Griffith

24 

---

Brok-Alan Woodward-Griffith, *pro se*

25 471 Silver Street, #105  
26 Manchester, NH, 03103  
27 [brokgrf@gmail.com](mailto:brokgrf@gmail.com)  
28 Ph: 603.325.0749

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy has been provided to all parties of record the Court's eFile service.

/s/Brok-Alan Woodward-Griffith

**FACTUAL AVERMENT**

I hereby make oath and say that all factual allegations presented herein are true and accurate to the best of my knowledge, belief, and ability.

/s/Brok-Alan Woodward-Griffith

# EXHIBIT 8

**THE STATE OF NEW HAMPSHIRE**

**SUPREME COURT**

**In Case No. 2024-0707, State of New Hampshire v. Anna Barbara Hantz Marconi, the court on January 15, 2025, issued the following order:**

Each justice whose name is listed below has recused himself or herself from this case. We therefore request that a quorum of substitute justices be appointed under RSA 490:3. Our recusal is conditioned upon the availability of substitute justices to participate in this case. In the event that substitute justices are not available, the “rule of necessity” may compel our participation. See Lorenz v. N.H. Admin. Office of the Courts, 151 N.H. 440, 444 (2004).

In light of the foregoing, the appellant’s motion to recuse is moot and need not be addressed.

MacDonald, C.J., and Bassett, Donovan, and Countway, JJ., concurred.

**Timothy A. Gudas,  
Clerk**

Distribution:

Brok-Alan Woodward-Griffith  
Joe Michael Fincham II, Esq.  
Attorney General  
Dan Alan Jimenez, Esq.  
Oliver Bloom, Esq.  
Richard C. Guerriero, Jr., Esq.  
Jonathan Kotlier, Esq.  
File

# EXHIBIT 9

**THE STATE OF NEW HAMPSHIRE**

**SUPREME COURT**

**In Case No. 2023-0527, PC Connection, Inc. v. Brok-Alan Woodward-Griffith & a., the court on October 24, 2023, issued the following order:**

Upon review of the parties' submissions regarding the interlocutory nature of this appeal, the appeal is dismissed on the basis that it is an improper interlocutory appeal. The dismissal is without prejudice to Brok-Alan Woodward-Griffith's ability to file a future appeal that is in accordance with the rules of this court.

In light of the foregoing, Brok-Alan Woodward-Griffith's motion to expedite appeal is moot.

Appeal dismissed.

This order is entered by a single justice (Hantz Marconi, J.). See Rule 21(7).

**Timothy A. Gudas,  
Clerk**

Distribution:

Hillsborough County Superior Court North, 216-2023-CV-00220

Honorable David A. Anderson

Mr. Brok-Alan Woodward-Griffith

Christopher H. M. Carter, Esq.

Owen R. Graham, Esq.

Joshua D. Nadreau, Esq.

File

# EXHIBIT 10

**THE STATE OF NEW HAMPSHIRE**

**SUPREME COURT**

**In Case No. 2023-0527, PC Connection, Inc. v. Brok-Alan Woodward-Griffith & a., the court on November 29, 2023, issued the following order:**

Supreme Court Rule 22(2) provides that a party filing a motion for rehearing or reconsideration shall state with particularity the points of law or fact that he claims the court has overlooked or misapprehended.

We have reviewed the claims made in Brok-Alan Woodward-Griffith's motion for reconsideration and conclude that no points of law or fact were overlooked or misapprehended in the decision to dismiss this appeal. Accordingly, upon reconsideration, we affirm the October 24, 2023 decision and deny the relief requested in the motion.

Brok-Alan Woodward-Griffith's motion to expedite appeal is denied. Brok-Alan Woodward-Griffith's motion for leave to file a reply to objection to motion for reconsideration is also denied.

Relief requested in motion for reconsideration denied.

MacDonald, C.J., and Hicks, Bassett, Hantz Marconi, and Donovan, JJ., concurred.

**Timothy A. Gudas,  
Clerk**

Distribution:

Hillsborough County Superior Court North, 216-2023-CV-00220

Honorable David A. Anderson

Mr. Brok-Alan Woodward-Griffith

Christopher H. M. Carter, Esq.

Owen R. Graham, Esq.

Joshua D. Nadreau, Esq.

Sherri L. Miscio, Supreme Court

File

# EXHIBIT 11

STATE OF NEW HAMPSHIRE

SUPREME COURT

PC CONNECTION, INC., D/B/A  
CONNECTION,

Plaintiff, Appellee

vs.

BROK-ALAN WOODWARD-GRIFFITH, ET  
AL,

Defendant, Appellant

Case No.: 2024-0678

**MOTION TO RECONSIDER EN BANC**

Pursuant to N.H. Supr. Ct. R. 22 and 29(9), Defendant/Appellant Brok-Alan Woodward-Griffith (“Griffith”), *pro se*, hereby humbly and respectfully requests *en banc* reconsideration of the Court’s March 3<sup>rd</sup>, 2025 Order disposing of the instant appeal as “interlocutory.” Appellant states in support as follows.

1. The arguments as to the merits of this appeal, and the fact that it constitutes a final decision on the merits, have largely been developed due the Honorable Clerk ordering a memorandum concerning same. (See “Defendant’s brief memo,” 01/08/2025, Case No. 2024-0678)
2. Griffith respectfully contends that the order of dismissal was in error because, 1) this is a proper mandatory appeal from a final decision on the merits; and 2) Hon. Justice Countway’s conclusion that, because “the trial court case remains pending,” this appeal is interlocutory, was an improper basis for determining whether a final decision on the merits had been reached, pursuant to N.H. Supr. Ct. R. 3, 7, 8.
3. Appellant respectfully acknowledges that based on the multitude of appeals that have come before the Supreme Court on this matter, and the allegations and arguments made therein, this proceeding and/or appeal may have been rendered such an **extreme** and **willful fraud**

1 *upon the court*, by and through the extreme misconduct and/or illegal actions of Justice  
2 Anna Barbara Hantz Marconi, Appellee PC Connection, Patricia Gallup, and/or the attorneys  
3 operating on behalf of and/or in the defense of same, that this Honorable Court is simply  
4 *unable* to adjudicate, hear, and/or otherwise touch this appeal, at this procedural standpoint.  
5

6 4. Nevertheless, Appellant still humbly and respectfully requests reconsideration *en banc* due  
7 to, and or in spite of, the factors as pled, and in related appeals, so that Appellant's rights to  
8 due process, equal protection and/or otherwise, are restored, and that justice and fundamental  
9 fairness is ensured. (See N.H. Supreme Ct. Case No. 2023-0527, 2024-0610, 2024-0678,  
10 2024-0708).  
11

12 **CONCLUSION AND PRAYER FOR RELIEF**

13 WHEREFORE, without prejudice and without waiving any rights, Appellant humbly and  
14 respectfully begs that this Honorable Court:

- 15 a. Reconsider the denial in this instant appeal, and accept this appeal for briefing;
- 16 b. Any such other and further relief as this Honorable Court deems just, necessary,  
17 equitable, and proper, and as required and appropriate to correct the manifest injustice  
18 caused by Appellee to the Appellant.  
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1 Respectfully submitted,

2 Dated this 13<sup>th</sup> of March, 2025.

3  
4 /s/Brok-Alan Woodward-Griffith

5 

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Brok-Alan Woodward-Griffith, *pro se*

6 471 Silver Street, #105  
7 Manchester, NH, 03103  
8 [brokgrf@gmail.com](mailto:brokgrf@gmail.com)  
9 Ph: 603.325.0749

10 **CERTIFICATE OF SERVICE**

11 I hereby certify a copy has been provided to  
12 all parties via the Court's eFile system.

13 /s/Brok-Alan Woodward-Griffith

14 **FACTUAL AVERMENT**

15 I hereby make oath and swear that the factual  
16 allegations herein are true and accurate to the  
17 best of my knowledge, belief, and ability.  
18 Further affiant sayeth naught.

19 /s/Brok-Alan Woodward-Griffith  
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# EXHIBIT 12

**THE STATE OF NEW HAMPSHIRE**

**SUPREME COURT**

**In Case No. 2024-0678, PC Connection, Inc. v. Brok-Alan Woodward-Griffith & a., the court on May 29, 2025, issued the following order:**

Supreme Court Rule 22(2) provides that a party filing a motion for rehearing or reconsideration shall state with particularity the points of law or fact that he claims the court has overlooked or misapprehended.

We have reviewed the claims made in Brok-Alan Woodward-Griffith's motion for reconsideration and conclude that no points of law or fact were overlooked or misapprehended in the decision dismissing this appeal. Accordingly, upon reconsideration, we affirm the March 3, 2025 decision and deny the relief requested in the motion.

Relief requested in motion for reconsideration denied.

MacDonald, C.J., and Bassett, Donovan, and Countway, JJ., concurred.

**Timothy A. Gudas,  
Clerk**

Distribution:

Hillsborough County Superior Court North, 216-2023-CV-00220

Honorable David A. Anderson

Owen R. Graham, Esq.

Joshua D. Nadreau, Esq.

Gabriel Gladstone, Esq.

Christopher H. M. Carter, Esq.

Brok-Alan Woodward-Griffith

Sherri L. Miscio, Supreme Court

File