

**THE STATE OF NEW HAMPSHIRE
SUPERIOR COURT**

ROCKINGHAM, SS.

AUGUST TERM, 2023

State of New Hampshire

v.

Brandon Castiglione

218-2019-CR-01132

**STATE’S OBJECTION TO DEFENDANT’S MOTION TO SEAL
MEMORANDUM IN SUPPORT OF SENTENCING**

NOW COMES the State of New Hampshire, by and through its attorneys, the Office of the Attorney General [“the State”], and respectfully Objects to the Defendant’s Motion to Seal his Memorandum in Support of Sentencing. The defendant has filed his motion 75 minutes before the hearing. In it he fails to sufficiently allege which portions of his sentencing memorandum consist of confidential information pursuant to Rule of Criminal Procedure 50(c), fails to state the authority for the confidentiality, or indicate which information meets these standards. From the 10 minutes counsel has afforded undersigned counsel to review the document before needing to travel to the courthouse for the hearing, it appears the vast majority, if not all, of the pleading should remain unsealed and does not contain confidential information.

For these reasons, and for the reasons stated orally at the impending hearing, the State objects to any sealing of the motion.

WHEREFORE the State respectfully requests that this Honorable Court:

- A. Deny the Defendant’s Motion to Seal without further specific support from the defendant; and
- B. Grant such further relief as may be just and proper.

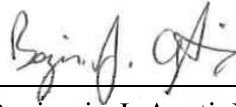
Respectfully submitted,

THE STATE OF NEW HAMPSHIRE

By its attorneys,

John M. Formella
Attorney General

August 25, 2023



Benjamin J. Agati, NH Bar ID #16161
Senior Assistant Attorney General

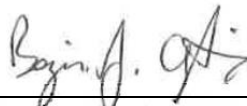
/s/ Adam L. Woods

Adam L. Woods, NH Bar ID #265354
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CERTIFICATION

I certify that a copy of this pleading has been sent to Wade Harwood, Esq., and
Amy Ashworth, Esq., counsel for the defendant.

August 25, 2023



Benjamin J. Agati