

THE STATE OF NEW HAMPSHIRE

HILLSBOROUGH, SS.

HILLSBOROUGH COUNTY SUPERIOR COURT - NORTH
STATE OF NEW HAMPSHIRE

V.

ADAM MONTGOMERY

216-2022-CR-2372

216-2022-CR-20

MOTION FOR ADDITIONAL SUPPLEMENT TO DEFENDANT'S WITNESS LIST

NOW COMES the defendant, Adam Montgomery, by and through counsel, Caroline L. Smith, Esq., and James T. Brooks and hereby gives notice of the following additional person as a possible witness in the above-entitled matter:

a) Travis Koeppel, MPD

In support of this request, the following is stated:

1. On January 16, 2024, defense counsel supplemented the witness list to include Sgt. Michael Bergeron. This was based upon discovery indicating the Sgt. Bergeron was the reporting officer of the service call at the Montgomery residence on September 11, 2019.
2. Also on January 16, 2024, the State provided additional discovery to the defendant. This discovery contained the report of the September 11, 2019 call to the Montgomery residence. A closer look at the report reveals that Officer Travis Koeppel authored the report regarding the September 11, 2019 call, and apparently Sgt. Bergeron simply forwarded the information to DCYF.

WHEREFORE, Adam Montgomery respectfully requests this Court permit this supplement to

the witness list.

Respectfully submitted,

/s/ Caroline L. Smith
Caroline L. Smith, Esq.
N.H. Bar #5992
N.H. Public Defender
408 Union Avenue
Laconia, NH 03246
(603) 524-1831

/s/ James T. Brooks
James T. Brooks, Esq.
NH Bar #14876
NH Public Defender
27 John Stark Highway
Newport, NH 03773
(603) 865-1460

CERTIFICATE OF SERVICE:

I hereby certify that a copy of this Witness List has been forwarded to the Office of the Attorney General on this 24 day of January, 2024.

/s/ Caroline L. Smith
Caroline L. Smith, Esq.