

THE STATE OF NEW HAMPSHIRE

HILLSBOROUGH, SS.  
DOCKET NO. 216-2022-CR-03011

SUPERIOR COURT  
NORTHERN DISTRICT

STATE OF NEW HAMPSHIRE

v.

ALEXANDRA ECKERSLEY

**STATE'S ASSENTED TO MOTION FOR EXTENSION OF TIME LIMITS TO FILE  
SUPPLEMENTAL BRIEF TO STATE'S MOTION TO EXCLUDE EXPERT  
TESTIMONY**

**NOW COMES**, the State of New Hampshire, by and through Shawn P. Sweeney, Assistant Hillsborough County Attorney, and hereby provides this supplement to the State's Motion to Exclude Expert Testimony, stating in support as follows:

1. At the Final Pre-Trial Conference on January 10, 2024, the State orally moved to exclude the testimony of Doctor Mathilde Pelaprat, Psy.D. The basis of the State's motion considered the timeliness of the Defense's expert disclosure as well as the relevance of the proposed testimony.

2. Following discussion, the parties agreed that the scheduled jury selection in this matter would be continued to July 22, 2024. This was done, in part, to allow the parties time to research and litigate issues relating to Doctor Pelaprat's testimony. This Honorable Court ordered that further pleadings should be filed by Wednesday, January 17, 2024.

3. The State respectfully requests further time to file its full and substantive supplement. In the first instance, the State's needs more time to complete its brief to the Court. Second, at the Final Pre-Trial Conference, the State contended that much, if not all, of Doctor Pelaprat's testimony is irrelevant. The information provided to the State by the Defense is contained in an expansive memorandum, however, the State believes having the deposition prior

Granted



Honorable Amy B. Messer

February 5, 2024

Clerk's Notice of Decision  
Document Sent to Parties

on 02/06/2024

to providing its full supplemental response will afford it the opportunity to examine the scope of any proposed testimony. It will also be instructive for the State to argue for limitations on the proposed testimony should this Court allow Doctor Pelaprat to testify.

4. The parties have reached an agreement to conduct the deposition on February 7, 2024. Following the deposition, the State would seek ten (10) days to file its substantive supplement. The Defense will have the opportunity to file its substantive objection thereafter.

5. Accordingly, the State respectfully requests this Honorable Court to grant it an extension of the time for filing its supplement.

6. Kimberly Kossick, Esq., and Jordan Strand, Esq. provide their assent to the State's motion.

**WHEREFORE**, the State respectfully requests that this Honorable Court:

- A. Grant the State's Motion;
- B. Schedule a hearing thereon, if necessary; and
- C. Grant the State any such other relief as may be proper and just.

DATED: February 2, 2024, 2024

Respectfully Submitted,

/s/ Alexander G. Gatzoulis, Esq.  
Alexander G. Gatzoulis, Esq. #18935  
Assistant Hillsborough County Attorney

**CERTIFICATION**

I hereby certify that a copy of the foregoing pleading has this day been sent to Kimberly A. Kossick, Esq., and Jordan Strand, Esq., Counsel for the Defendant.

/s/ Alexander G. Gatzoulis, Esq.  
Alexander G. Gatzoulis, Esq.