

THE STATE OF NEW HAMPSHIRE

HILLSBOROUGH, ss.

SUPERIOR COURT
NORTHERN DIVISION

STATE OF NEW HAMPSHIRE

v.

ALEXANDRA ECKERSLEY

Case No. 216-2022-CR-03011

**PETITION OF UNION LEADER CORPORATION TO
INTERVENE AND MOTION TO UNSEAL COURT RECORDS**

Union Leader Corporation, (hereinafter “Union Leader”), through counsel, hereby moves to intervene in this criminal action and to unseal court records. In support of this Motion Union Leader states as follows:

1. Union Leader is a corporation organized and existing under the laws of the State of New Hampshire with a principal office located in Manchester, Hillsborough County, and is the publisher of newspapers of general circulation, and other media, throughout the state of New Hampshire, and elsewhere;
2. Union Leader has learned that many documents have been filed in this case “under seal” and/or sealed in their entirety. The Union Leader hereby asserts that the records now under seal have been sealed in violation of the procedural requirements of New Hampshire Rule of Criminal Procedure 50(b), and/or without a compelling interest justifying such closure.
3. The right to know sought by this motion is made sacrosanct by Part I Articles 8 and 22 of the New Hampshire Constitution. "Such access is critical to ensure that

court proceedings are conducted fairly and impartially, . . . and that the judicial process is open and accountable.” Associated Press v. State of New Hampshire, 153 NH 120, 129 (2005) (*quotations omitted*). Furthermore, "public access to criminal trials permits the public to participate in and serve as a check upon the judicial process -- an essential component in our structure of self-government." State v. DeCato, 156 NH 570, 577 (2007), (*quotation omitted*).

4. Union Leader respectfully direct the Court’s attention to the Memorandum of Law submitted herewith and incorporated herein by reference, in support of this motion.

WHEREFORE, Union Leader now prays that the Petition to Intervene and Motion to Unseal Court Records be granted, that all court records that are currently sealed be examined by the Court with counsel for the Parties and for the Petitioner present, that the records not necessarily sealed be unsealed, that redaction be allowed to safeguard legitimate interests and for such other and further relief as the Court deems just.

**UNION LEADER RESPECTUFLY REQUESTS
THAT IT BE GIVEN THE OPPORTUNITY TO PRESENT
ORAL ARGUMENT IN SUPPORT OF THE INSTANT PETITION
TO INTERVENE AND MOTION TO UNSEAL COURT RECORDS**

Respectfully submitted,
Union Leader Corporation
by its attorney,

/s/ Gregory V. Sullivan
Gregory V. Sullivan
NH Bar# 2471
/s/ Kathleen C. Sullivan
NH Bar # 14797

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Dated: June 12, 2024

CERTIFICATE OF SERVICE

I hereby certify that on June 12, 2024, I served the foregoing Petition and Motion through the Court's e-filing system to registered counsel of record.

/s/ Gregory V. Sullivan