

STATE OF NEW HAMPSHIRE

HILLSBOROUGH, S.S.  
216-2022-CR-03011

SUPERIOR COURT  
NORTHERN DISTRICT

STATE OF NEW HAMPSHIRE

v.

ALEXANDRA ECKERSLEY

**MOTION TO EXCLUDE TESTIMONY OF DR. MATHILDE PELAPRAT**

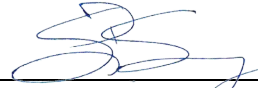
NOW COMES, the State of New Hampshire by and through the Hillsborough County Attorney's Office, Shawn P. Sweeney, with this motion to exclude the testimony of Dr. Mathilde Pelaprat in the above captioned matter including facts taken from police reports:

1. On 12/26/2022, at about 12:30 a.m., EMT Lauren Barry responded to a call regarding concern for a woman who was bleeding after just having given birth. Upon arrival at the defendant's location, Ms. Barry saw George Theberge walking into woods and the defendant seated on the ground next to the rail trail at the bridge near West Side Ice Arena.
2. The defendant immediately began fabricating stories. The defendant informed EMTs and police that she gave birth to two babies while walking back from a store on the east side of Manchester. When asked about the location of the infants, the defendant was vague and continuously changed details about where she discarded the infants.
3. After approximately one hour of leading rescuers around various areas adjacent to the ice arena in temperatures below 20 degrees, the defendant was taken back to the ambulance so she could warm up.
4. After warming up in the ambulance, the defendant told rescuers that she knew where the discarded newborns were. The defendant blamed George Theberge for her ongoing efforts to deceive rescuers about the location of the discarded infant in the freezing temperatures.
5. The defendant then led rescuers directly to the sight where a single discarded newborn was laying on the floor of tent. Rescuers described the discarded infant's skin as "white an purple/blue still wet from birth with an unclamped umbilical cord. Ineffectively breathing with minimal chest rise."
6. An EMT rapidly began infant CPR while vigorously rubbing the infant to warm him and keep him alive. The EMT ran out of the woods with the newborn while continuing CPR. The EMT called for an ambulance to meet them at a closer location. There was no ambulance when rescuers

came out of the woods, so the EMT boarded a fire truck to transport the infant to the hospital because of the urgency.

7. Based on the above facts, the defendant was charged with the following charges and factual allegations:
  - a. 2045609c Second Degree Assault – Eckersley recklessly caused respiratory distress to her newborn infant when she abandoned the newborn infant where the ambient temperature was extremely cold.
  - b. 2054510c Second Degree Assault - Eckersley recklessly caused hypothermia to her newborn infant when she abandoned the newborn infant where the ambient temperature was extremely cold.
  - c. 2045612c Reckless Conduct – Eckersley recklessly abandoned her newborn infant where the ambient temperature extremely cold.
  - d. 2045614c Falsifying Physical Evidence - Eckersley, believing that investigation was about to be instituted, concealed the location of her newborn infant, with the purpose to impair its availability in such investigation.
  - e. 2045633c Endangering the Welfare of a Child - Eckersley knowingly abandoned the newborn infant in a tent without heat or proper clothing in the woods when the outside temperature was approximately 15 degrees Fahrenheit and failed to immediately seek medical assistance for over an hour.
  - f. 2045612c Reckless Conduct - Eckersley recklessly abandoned her prematurely newborn infant in a tent without heat or proper clothing in the woods when the outside temperature was approximately 15 degrees Fahrenheit.
8. On January 2, 2024, the defendant notified the State of her intent to present Dr. Mathilde Pelaprat by listing her on their witness list less than 3 weeks prior to the January 22, 2024 Jury Selection.
9. The only previous mention of Dr. Peleprat was a report the defendant provided 2 weeks earlier for a separate proceeding with no indication that the defendant intended for Dr. Peleprat to testify at trial.
10. At no time did the defendant give notice of her intent to present Dr. Peleprat as an expert witness. The State therefore presumes that Dr. Peleprat would testify as a lay witness based on reports she reviewed and witnesses that she spoke with.
11. A review of the reports provided by the defendant revealed no evidence that would have any tendency to make a fact in dispute more or less probable. NH R. Evid. 401. Irrelevant evidence is inadmissible. NH R. Evid. 402.

Respectfully Submitted,  
State of New Hampshire,

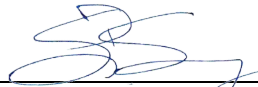


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**CERTIFICATION**

This motion has been uploaded and filed this date in accordance with eFile & Serve rules.



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Shawn P. Sweeney