

STATE OF NEW HAMPSHIRE

HILLSBOROUGH COUNTY
NORTHERN DISTRICT

SUPERIOR COURT

STATE OF NEW HAMPSHIRE

v.

ALEXANDRA ECKERSLEY

216-2022-CR-3011

RESPONSE TO UNION LEADER PETITION TO INTERVENE

Kimberly A. Kossick, counsel for Alexandra Eckersley, offers this response to the Union Leader PETITION TO INTERVENE.

1. The defense has no objection to the petition to intervene except as to protected medical information.
2. In particular, the defense has no objection to unsealing the State's MOTION FOR ORDER PROHIBITING ADDITIONAL TRIAL PUBLICITY.
3. There is no information in that motion which is not already in the public record.
4. The defense objected to the Motion to Seal. The defense indicated it would file a substantive objection when the motion to seal had been ruled on. The Court granted both motions simultaneously. The defense chose not to file a motion to reconsider because the trial will begin in a month. Most, if not all, of the information in the sealed documents will become part of the public record.
5. However, the information objected to by the State is allowed by Rule 3.6. The relief sought was in relation to Rule 3.6. The defense did not violate Rule 3.6 and does not intend to violate Rule 3.6.

WHEREFORE, Kimberly A. Kossick, counsel for Alexandra Eckersley, respectfully requests the Honorable Court:

- A. Deny the Union Leader Petition as to protected medical information.
- B. Grant the Petition as to the State's Motion regarding trial publicity.
- C. Grant other relief deemed equitable and just.

Respectfully submitted,

/s/ Kimberly A. Kossick
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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing has been served via efile to the Hillsborough County Attorney's Office.

/s/ Kimberly A. Kossick
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