

STATE OF NEW HAMPSHIRE

HILLSBOROUGH, SS
NORTHERN DISTRICT

SUPERIOR COURT

Crystal Sorey, Individually and as Administratrix
of the Estate of Harmony Montgomery

Granted



Honorable David A. Anderson
February 18, 2025

v.

State of New Hampshire, Department of Health and Human Services,
Division of Children, Youth, and Families ("DCYF")

#216-2024-CV-00722

**PLAINTIFFS' ASSENTED-TO MOTION TO ENLARGE TIME TO
OBJECT TO DEFENDANT'S MOTION TO DISMISS**

NOW COME the plaintiffs, Crystal Sorey, individually and as Administratrix of the Estate of Harmony Montgomery, by and through her attorneys, Douglas, Leonard & Garvey, P.C., and move this Court to enlarge, by thirty (30) days, the deadline for objecting to Defendant's Motion to Dismiss, stating as follows:

1. The Complaint in this matter was filed on September 13, 2024.
2. The Court granted Plaintiffs' First Amended Complaint on December 10, 2024.
3. The Defendant sought, and was granted, an extension to respond to the First Amended Complaint to February 14, 2024.
4. Plaintiffs' Assented-To Motion to Allow Second Amended Complaint and Second Amended Complaint were filed on February 11, 2024, and February 12, 2024.
5. In response, the Defendant's Motion to Dismiss Count III of the Second Amended Complaint was filed on February 12, 2024.

6. With the Defendant's assent, the plaintiffs request to extend their response deadline to the Motion to Dismiss for thirty (30) days or March 24, 2025.

WHEREFORE, Plaintiffs pray that this Honorable Court:

A. Enlarge the time for objecting to Defendant's Motion to Dismiss by thirty (30) days to March 24, 2025; and

B. Grant such other and further relief as is just and equitable.

Respectfully submitted,
CRYSTAL SOREY
By her attorneys,
DOUGLAS, LEONARD & GARVEY, P.C.

Date: February 14, 2025

By: /s/ C. Kevin Leonard
C. Kevin Leonard, NH Bar #10019
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been electronically served through ECF this date to all counsel of record.

/s/ C. Kevin Leonard
C. Kevin Leonard