

STATE OF NEW HAMPSHIRE

HILLSBOROUGH, SS  
NORTHERN DISTRICT

SUPERIOR COURT

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

v.

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

#216-2024-CV-00722

**PLAINTIFFS' SECOND 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 an additional thirty (30) days, the deadline for objecting to Defendant's Motion to Dismiss, stating as follows:

1. Plaintiffs seek an extension to respond to Defendant's Motion to Dismiss Count III of the Second Amended Complaint.
2. With the Defendant's assent, the plaintiffs request to extend their response deadline to the Motion to Dismiss for an additional thirty (30) days or to April 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 April 24, 2025; and

Granted



Honorable David A. Anderson  
March 21, 2025

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: March 20, 2025

By: /s/ C. Kevin Leonard  
C. Kevin Leonard, NH Bar #10019  
14 South Street, Suite 5  
Concord, NH 03301  
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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