

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' MOTION TO ENLARGE TIME TO**  
**EFFECT SERVICE UPON DEFENDANT**

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 effecting service upon the Defendant and the deadline by which proof of service shall be filed with the Court, stating as follows:

1. The Complaint in this matter was filed on September 13, 2024.
2. The service deadline is currently set for November 4, 2024, with Returns of Service to be filed with the Court by November 25, 2024.
3. After filing the Complaint, Plaintiff and her original counsel contacted Douglas, Leonard & Garvey, P.C. to assist in the prosecution of this case.
4. With the approaching service deadline, undersigned counsel would like an opportunity to discuss acceptance of service and other relevant matters with the Defendant prior to the service deadline.

Granted



Honorable David A. Anderson

October 29, 2024

1

Clerk's Notice of Decision  
Document Sent to Parties  
on 10/31/2024

5. The Defendant will not be prejudiced if the relief sought in this Motion is granted.

WHEREFORE, Plaintiff prays that this Honorable Court:

A. Enlarge the time for service upon Defendant by thirty (30) days to December 4, 2024;

B. Enlarge the time for filing of returns by an additional thirty (30) days to December 25, 2024; and

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

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

Date: October 28, 2024

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