

THE STATE OF NEW HAMPSHIRE

ROCKINGHAM, SS

SUPERIOR COURT

No. 217-2020-cv-00026

David Meehan

v.

New Hampshire Department of Health and Human Services et al

**THIS DOCUMENT PERTAINS ONLY
TO PLAINTIFF MEEHAN'S INDIVIDUAL CASE**

THIS DOCUMENT DOES NOT PERTAIN TO CONTRACTOR DEFENDANTS

MOTION FOR EXTENSION OF TIME

The Department of Health and Human Services (“DHHS”), by and through counsel, hereby moves this court for an extension of time on filing any post-trial motion to a date ten days after this Court issues its forthcoming “interim” order as outlined in its orders on Plaintiff’s Emergency Motion for Hearing; DHHS’s Motion to Apply Cap; and Plaintiff’s Emergency Motion to Jury Poll. As DHHS does not know what the Court’s interim order may state, DHHS respectfully requests that this Court grant ten days leave following the date of said interim order to either supplement its Motion for Judgment Notwithstanding the Verdict, or to file for any additional post-trial relief as justice may require.

Plaintiff’s counsel informed undersigned that they are “not in a position to assent to an extension of the post-trial motion deadline until after we get additional rulings from Judge Schulman.”

WHEREFORE, DHHS respectfully requests that this honorable court:

A. Grant this Motion; and

- B. Allow DHHS ten (10) days leave to either supplement its Motion for Judgment Notwithstanding the Verdict or to file for any other post-trial relief that justice may require upon the issuance of this Court’s forthcoming interim order; and
- C. Grant such other relief as is just and equitable.

Respectfully Submitted,

New Hampshire Department of Health and Human Services; Department of Youth Development Services; Division of Children, Youth, and Families; Division of Juvenile Justice Services; and Sununu Youth Services Center, a/k/a Youth Development Center and Youth Development Services Unit, f/k/a State Industrial School and Adolescent Detention Center

By their attorney,

JOHN M. FORMELLA
ATTORNEY GENERAL

Date: May 13, 2024

/s/ Brandon F. Chase
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was sent via the Court’s electronic filing system to all parties of record on the date above.

/s/ Brandon F. Chase
Brandon F. Chase