

Clerk's Notice of Decision
Document Sent to Parties

on 10/17/2024

STATE OF NEW HAMPSHIRE

ROCKINGHAM, SS.

SUPERIOR COURT

Granted

CASE NO. 217-2020-CV-00026



DAVID MEEHAN

Honorable Andrew R. Schulman

v.

October 17, 2024

STATE OF NEW HAMPSHIRE,
DEPARTMENT OF HEALTH AND HUMAN SERVICES, et al.

THIS FILING PERTAINS TO FIVE OR MORE CASES

THIS FILING DOES NOT PERTAIN TO CONTRACTOR DEFENDANTS

**PLAINTIFFS' UNOPPOSED MOTION TO EXTEND DEADLINES
FOR ENHANCED AUTOMATIC DISCLOSURES**

Plaintiffs, John Does ##1, 2, 3, 4, 6, 8, 9, 10, 58, 92, and Jane Doe #1 (“Plaintiffs”) respectfully file this unopposed motion to extend their deadlines to provide Enhanced Automatic Disclosures. In support thereof, Plaintiffs state the following:

1. On August 15, 2024, this Court issued a “Case Structuring Order for Cases Assigned to Judge Schulman and Supporting Reasons” (the “Structuring Order”), establishing various discovery deadlines.

2. The Structuring Order required Natasha Maunsell¹, John Does ##1, 2, 3, 4, 6, 8, 9, 10, 58, 92, and Jane Doe #1 to submit their Enhanced Automatic Disclosures within 60 days of the clerk’s notice of the Structuring Order. (Structuring Order at 13). The Clerk’s Notice of Decision was sent to the parties on August 16, 2024. Therefore, the 60-day deadline for Enhanced Automatic Disclosures currently falls on October 15, 2024.

¹ Natasha Maunsell produced her Enhanced Automatic Disclosure on September 27, 2024, and therefore does not seek to extend the deadline to submit her Enhanced Automatic Disclosure.

3. Given the robust nature of the required disclosures and the voluminous records that need to be reviewed for each case, Plaintiffs' counsel seeks a brief extension, until November 1, 2024, to submit the Enhanced Automatic Disclosures for John Does ##1, 2, 3, 4, 6, 8, 9, and 58.

4. John Does ##10, 92, and Jane Doe #1 have submitted claims to the Youth Development Center Claims Administration and Settlement Fund (the "Settlement Fund"). The Attorney General's Office has filed a Notice of Filing of Claim and Partial Stay in their cases, as mandated by RSA 21-M:11-a, VII(e), which requires individuals who opt into the Settlement Fund to stay any pending proceedings as a condition of processing their Settlement Fund claim. Thus, by operation of their decisions to enter into the Settlement Fund, the deadline to produce an Enhanced Automatic Disclosure is stayed in the matters of John Does ##10, 92, and Jane Doe #1 as long as their Settlement Fund claims are pending.

5. The brief extension of the Enhanced Automatic Disclosure Deadline for John Does ##1, 2, 3, 4, 6, 8, 9, and 58 is reasonable, will not prejudice either parties' ability to prepare for trial, and will not affect any other deadlines established by the Structuring Order.

6. Undersigned counsel conferred with counsel for the State, who take no position on the requested extension to provide Enhanced Automatic Disclosures for John Does ##1, 2, 3, 4, 6, 8, 9, and 58, but stated that they will not oppose this motion.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court:

- A. Grant an extension of the deadline for John Does ## 1, 2, 3, 4, 6, 8, 9, and 58 to provide Enhanced Automatic Disclosures from October 15, 2024 to November 1; and
- B. Grant any other relief as justice may require.

Respectfully submitted,

PLAINTIFFS,

**JOHN DOES ##1, 2, 3, 4, 6, 8, 9, 10
58, 92 and JANE DOE #1**

Dated: October 11, 2024

By and through counsel,

RILEE & ASSOCIATES, P.L.L.C.

NIXON PEABODY LLP

/s/ Cyrus F. Rilee, III

/s/ W. Daniel Deane

Cyrus F. Rilee, III, Esq. (Bar No. 15881)

David A. Vicinanza, Esq. (Bar No. 9403)

Laurie B. Rilee, Esq. (Bar No. 15373)

W. Daniel Deane, Esq. (Bar No. 18700)

264 South River Road

Mark Tyler Knights, Esq. (Bar No. 264904)

Bedford, NH 03110

Nathan Warecki, Esq. (Bar No. 20503)

T: 603.232.8234

Erin S. Bucksbaum, Esq. (Bar No. 270151)

crilee@rileelaw.com

Allison K. Regan, Esq. (Bar No. 272296)

lrilee@rileelaw.com

900 Elm Street, 14th Floor

Manchester, NH 03101

T: 603-628-4000

dvicinanzo@nixonpeabody.com

ddeane@nixonpeabody.com

mknights@nixonpeabody.com

nwarecki@nixonpeabody.com

ebucksbaum@nixonpeabody.com

aregan@nixonpeabody.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via the Court's e-filing system on all parties of record on October 11, 2024.

/s/ W. Daniel Deane