

STATE OF NEW HAMPSHIRE

ROCKINGHAM, ss.

SUPERIOR COURT

CASE NO. 217-2020-CV-00026

DAVID MEEHAN

v.

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

NOTICE OF FILING RELATED CASES

PLEASE TAKE NOTICE that the civil actions being filed by Plaintiffs¹ in Rockingham Superior Court are related to Case No. 217-2020-CV-00026 (the “Meehan Case”) pending in this Court, within the meaning of this Court’s Order Designating 2020-CV-26 As the Lead Case for Filing Purposes (Index #36). The civil actions being filed by Plaintiffs concern substantially the “same types of claims against the same State parties” which are the subject of the Meehan Case. *Id.* ¶ 5. Plaintiffs seek damages and injunctive relief against defendants who are also named as State Defendants in the Meehan Case, based on the same factual allegations and legal claims which are the subject of the Meehan Case.

Respectfully submitted,

PLAINTIFFS

Dated: May 2, 2023

By and through counsel,

¹ See List of Plaintiffs, appended hereto as **Appendix A**.

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

/s/ Cyrus F. Rilee, III

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

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

264 South River Road

Bedford, NH 03110

T: 603.232.8234

crilee@rileelaw.com

lrilee@rileelaw.com

NIXON PEABODY LLP

/s/ David A. Vicinanza

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

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

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

Kierstan Schultz, Esq. (Bar No. 20682)

Nathan Warecki, Esq. (Bar No. 20503)

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

Allison Regan, Esq. (Bar No. 272296)

900 Elm Street, 14th Floor

Manchester, NH 03101

T: 603-628-4000

dvicinanza@nixonpeabody.com

ddeane@nixonpeabody.com

mknights@nixonpeabody.com

kschultz@nixonpeabody.com

nwarecki@nixonpeabody.com

ebucksbaum@nixonpeabody.com

aregan@nixonpeabody.com

CERTIFICATE OF SERVICE

I certify that on May 2, 2023, I am sending a copy of this document as required by the rules of the court. I am electronically sending this document through the court's e-filing system to all attorneys and to all other parties who have entered electronic service contacts (email addresses) in this case. By agreement of the parties, I am e-mailing a copy to counsel for the State of New Hampshire.

/s/ David A. Vicinanza

**APPENDIX A
LIST OF PLAINTIFFS**

Jane Doe #118 (against State Defendants and Doe Contractor Defendant)
Jane Doe #119 (against State Defendants and Contractor Defendant Easter Seals
New Hampshire, Inc.)
John Doe #775 (against State Defendants and Contractor Defendant Eckerd Youth
Alternatives, Inc.)
John Doe #776 (against State Defendants)
John Doe #777 (against State Defendants and Contractor Defendant Eckerd Youth
Alternatives, Inc.)
John Doe #780 (against State Defendants)

THE REMAINDER OF THIS PAGE INTENTIONALLY LEFT BLANK.