

STATE OF NEW HAMPSHIRE

ROCKINGHAM, SS.

SUPERIOR COURT

DAVID MEEHAN

v.

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

217-2020-CV-00026  
and all consolidated YDC and YDSU CASES

**STATE DEFENDANTS' RESPONSE TO PLAINTIFFS' MOTION  
TO APPOINT REFEREE AS DISCOVERY MASTER**

The State Defendants do not oppose the Plaintiffs' Motion to Appoint Referee as Discovery Master. However, State Defendants reserve their right to object at a later date if the parties are unable to agree on a joint proposed order.

Respectfully Submitted,

State of New Hampshire; 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 attorneys,

JOHN M. FORMELLA  
ATTORNEY GENERAL

Date: April 11, 2023

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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