

STATE OF NEW HAMPSHIRE

Superior Court

Merrimack, ss.

June Term, 2025

State of New Hampshire

No. 217-2024-CR-1167

v.

Anna Barbara Hantz Marconi

OBJECTION TO EX-PARTE MOTION FOR IMMEDIATE STAY IN PRESERVATION OF  
PROPOSED [SIC] INTERVENOR'S RIGHTS AND APPEAL

The accused, Justice Anna Barbara Hantz Marconi, respectfully objects to the *Ex Parte* Motion for Immediate Stay in Preservation of Proposed [sic] Intervenor's Rights and Appeal because putative intervenor Mr. Woodward-Griffith continues to lack standing to intervene in a criminal case, as explained below:

1. On May 30, 2025, putative intervenor Mr. Woodward-Griffith filed an "Urgent *Ex-Parte* Motion to Stay All Proceedings and Strike Jury Trial." *State v. Anna Barbara Hantz Marconi*, 217-2024-CR-01167 (Index #96). On June 3, 2025, this court directed the accused and the State to respond to Mr. Woodward-Griffith's motion. Order, *State v. Anna Barbara Hantz Marconi*, 217-2024-CR-01167 (Index #98).

2. To recap, this court has thrice denied Mr. Woodward-Griffith's attempts to intervene in this criminal case. *See* Order, *State v. Anna Barbara Hantz Marconi*, 217-2024-CR-01167 (Dec. 10, 2024, Index #23); Order, *State v. Anna Barbara Hantz Marconi*, 217-2024-CR-01167 (Dec. 30, 2024, Index #29); Order, *State v. Anna Barbara Hantz Marconi*, 217-2024-CR-01167 (March 20, 2025, Index #48). The New Hampshire Supreme Court summarily affirmed this court's denial of the first motion to intervene. *See* Docket No. 2024-0707. The renewed motion

to intervene is currently on appeal, where the State, with the assent of the accused, has filed another motion for summary affirmance. *See* Docket No. 2025-0203.

3. Instead of addressing the fundamental defects plaguing his pleadings, putative intervenor Griffith has instead filed the instant motion seeking the extraordinary and unprecedented relief of an indefinite stay of a criminal case while the Supreme Court disposes of his latest appeal. Nothing in his pleading answers this court's repeated findings that he has no standing to intervene in a criminal case and has no sound justification to unseal secret grand jury materials. Instead, Mr. Griffith offers up an assortment of unsubstantiated constitutional claims and wild accusations that do nothing to cure the defects of his pleadings. He cites no relevant cases. He points to no pertinent rules. In the words of this court, his "arguments are no better now than they were before." Order, *State v. Anna Barbara Hantz Marconi*, 217-2024-CR-01167 (Index #49). This court should not reward Mr. Griffith's frivolous and vexatious filings with an unprecedented stay.

4. While the accused does not believe this court need reach the merits of Mr. Woodward-Griffith's motion, if it does, it will see it has no answers to this court's previous orders regarding his lack of standing, is replete with inapposite case law and rules, confuses RSA 91-A Right to Know requests with the unsealing of grand jury materials pursuant to N.H. R. Crim. P. 50, and makes grandiose and unsubstantiated allegations of a vast conspiracy in the New Hampshire Judicial Branch.

WHEREFORE, the accused respectfully requests that the court deny putative intervenor Brok-Alan Woodward-Griffith's *Ex Parte* Motion for Immediate Stay because he continues to lack standing to intervene. The accused further requests that this court enforce its December 10, 2024 order preventing Mr. Griffith from filing future motions into this case and, should he continue, respectfully requests attorneys' fees pursuant to N.H. Super. Ct. R. 11(d). In the

alternative that the Court denies this objection, the defense requests leave to file a further objection to the substance motion(s) filed by Brok-Alan Woodward-Griffith.

Dated this 10<sup>th</sup> day of June, 2025.

Respectfully submitted,

*/s/ Richard Guerriero*  
Richard Guerriero  
N.H. Bar # 10530  
Oliver Bloom  
N.H. Bar # 277555  
Lothstein Guerriero, PLLC  
Chamberlain Block  
39 Central Square, Suite 202  
Keene, NH 03431  
(603) 352-5000

Jonathan Kotlier  
Pro Hac Vice, by 2024-10-23 order of this court  
Nutter, McClennen & Fish  
155 Seaport Blvd  
Boston, MA 02210  
(617) 439-2000

CERTIFICATE OF SERVICE

I, Richard Guerriero, do hereby certify that Senior Assistant Attorney General Dan Jimenez and Assistant Attorney General Joseph Fincham are registered e-filers in the Court's electronic filing system and that when filing this motion, I am electing for them to receive a copy of the document through the electronic filing system's system for electronic service. Paper copies and PDF copies are also being conventionally mailed and emailed to Mr. Brok-Alan Woodward-Griffith.

*/s/ Richard Guerriero*