

STATE OF NEW HAMPSHIRE

Superior Court

Merrimack, ss.

April Term, 2025

State of New Hampshire

No. 217-2024-CR-1167

v.

Anna Barbara Hantz Marconi

ASSENTED-TO MOTION TO EXTEND DEADLINE

The defense, with the assent of the State, respectfully requests that this Court extend by fourteen (14) days the deadline for all parties to file substantive pretrial motions.

1. The parties appeared at a dispositional conference on March 20, 2025. At that time, the defense notified the Court that the defense anticipated filing additional pretrial motions and that the defense was considering filing a motion requesting a bench trial.

2. As set forth in N.H. R. Crim. P. 15(b)(1), unless otherwise ordered by the Court, all pretrial motions, other than discovery-related motions, shall be filed either sixty days after entry of a plea of not guilty or fifteen days after the dispositional conference, whichever is later. Thus, according to the rule, all pretrial motions for both the defense and the State are due April 4, 2025.

3. The defense is likely to file some of its motions by the April 4, 2025 deadline, but given the number of indictments and the complexity of the issues presented, respectfully requests an additional two weeks to brief the issues for this Court. Similarly, the defense decision to file a motion requesting a bench trial is complicated and is affected by the motions which will be filed.

4. The defense contacted Senior Assistant Attorney General Dan Jimenez regarding the request to extend the deadline. He assented on behalf of the State. He also asked that the State's deadline be extended as well, a request to which the defense assents.

Clerk's Notice of Decision
Document Sent to Parties
on 04/03/2025

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Granted



Honorable Charles S. Temple
April 2, 2025

WHEREFORE, the defense, with the assent of the State, respectfully requests that the deadline for pretrial motions for all parties be extended from April 4, 2025, to April 18, 2025.

Dated this 2nd day of April, 2025.

Respectfully submitted,

/s/ Richard Guerriero
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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.

/s/ Richard Guerriero