

THE STATE OF NEW HAMPSHIRE

MERRIMACK, ss.

SUPERIOR COURT

Case No. 217-2025-CV-00480

Andrew Foley;
Ronald “Chuck” Miles; and
Jane Doe #231

On behalf of themselves and all those similarly situated

v.

The State of New Hampshire;
New Hampshire Governor, Kelly Ayotte, in her official capacity; and
New Hampshire Attorney General, John Formella, in his official capacity.

**PLAINTIFFS’ AMENDED¹ CORRECTED EXHIBIT LIST:
HEARING ON THE MERITS**

EXHIBIT	DESCRIPTION	ID / ADMITTED
1	HB2, 2025-2871 §§ 437, 439	FULL
2	Office of Legislative Budget Assistant, Final Report – Review of Settlement Fund Finances and Operations, June 6, 2025	FULL
3	Affidavit of Andrew Foley, June 26, 2025	ID
4	Affidavit of Ronald C. Miles, June 26, 2025	ID
5	Affidavit of Jane Doe #231, June 26, 2025	ID
6	NH RSA ch. 21-M, sec. 21-M:11-a, eff. June 14, 2024	FULL
7	SB 591-FN-A, eff. June 14, 2024	FULL
8	Claims Process for Administration of the YDC Settlement Fund (Rev. 1.4), August 30, 2024	FULL
9	Guidelines for Valuing Claims for Settlement Purposes (Rev. 1.2), August 2024	FULL
10	NH YDC Claims Administration and Settlement Fund, Sample Claim Form	FULL
11	NH YDC Claims Administration for YDC Settlement Fund, Notarized Attestation of Claimant, Verification and Signature for YDCCA Claim	FULL

¹ This **Amended Corrected Exhibit List** includes the addition of Plaintiffs’ Exhibits 30-35. The Court ruled previously on the admissibility of Plaintiffs’ Exhibits 1-29.

EXHIBIT	DESCRIPTION	ID / ADMITTED
12	NH YDC Claims Administration and Settlement Fund, Claimant’s Statement of Completion Form, September 2024	FULL
13	NH Superior Court Form, Notice of Filing of Claim and [Partial] Stay	FULL
14	YDC Claims Administration, Notice of Claim Form	FULL
15	NH YDC Claims Administration and Settlement Fund, Public Bulletin – Letter from Administrator Broderick, June 30, 2025	FULL
16	Amanda Gokee, “YDC fund administrator warns new N.H. law will remove him, amid concerns of fairness,” <i>Boston Globe</i> , June 30, 2025	ID
17	Affidavit of John Doe #334, August 6, 2025	ID
18	NH AG Statement on Senate’s Passage of HB1677, May 5, 2022	FULL
19	Email exchange with NH DOJ re: YDC Claims	FULL
20	Letter to the Hon. J. Bradley re YDC Settlement Fund Legislation, February 5, 2024	FULL
21	NH DOJ Statement on SB591 Being Signed Into Law, June 14, 2024	FULL
22	Annmarie Timmins, “Victims’ attorneys who objected to YDC settlement fund support proposed changes,” <i>New Hampshire Bulletin</i> , February 20, 2024.	ID
23	Administrator’s Quarterly Report for the YDC Claims and Administration and Settlement Fund 1Q25 and Letter from John T. Broderick, April 16, 2025	FULL
24	Administrator’s Quarterly Report for the YDC Claims and Administration and Settlement Fund 2Q25 and Letter from John T. Broderick, July 24, 2025	FULL
25	N.H. YDC Claims Administration and Settlement Fund, Public Bulletin, Status of Administrator and Assistant Administrator, July 21, 2025, https://www.ydcclaims.nh.gov/sites/g/files/ehbemt701/files/inline-documents/sonh/ydcca-bulletin-administrator-and-assistant-administrator.pdf	FULL
26	Nancy West, <i>Ayotte Says Broderick Resigned YDC Fund Post; He Says, ‘I didn’t resign. They Took My Job Away,’</i> InDepthNH.org, July 22, 2025, https://indepthnh.org/2025/07/22/ayotte-says-broderick-resigned-ydc-fund-post-he-says-i-didnt-resign-they-took-my-job-away/	ID
27	John T. Broderick, Jr., Op-Ed, <i>It’s Just Not Right</i> , InDepthNH.org, July 31, 2025, https://indepthnh.org/2025/07/31/john-broderick-its-just-not-right/	ID
28	Affidavit of Deborah Greenspan, Esq., August 6, 2025	ID

EXHIBIT	DESCRIPTION	ID / ADMITTED
29	Affidavit of Dylan Gee, Ph.D., August 6, 2025	ID
30	Transcript: N.H. Senate Judiciary Committee Meeting, Public Hearing on SB 591, testimony of Senator Jeb Bradley, at 4:45–25:18, YOUTUBE (Feb. 20, 2024) https://www.youtube.com/live/DXmEbogAiSE .	ID
31	N.H. Senate Livestream, N.H. Senate Judiciary Committee Meeting, Public Hearing on SB 591, testimony of Senator Jeb Bradley, at 7:46–8:42, YOUTUBE (Feb. 20, 2024) https://www.youtube.com/live/DXmEbogAiSE .	ID
32	N.H. Senate Livestream, N.H. Senate Judiciary Committee Meeting, Public Hearing on SB 591, testimony of Senator Jeb Bradley at 9:03–9:53, YOUTUBE (Feb. 20, 2024) https://www.youtube.com/live/DXmEbogAiSE .	ID
33	N.H. Senate Livestream, N.H. Senate Judiciary Committee Meeting, Public Hearing on SB 591, testimony of Senator Jeb Bradley at 21:00–23:54, YOUTUBE (Feb. 20, 2024) https://www.youtube.com/live/DXmEbogAiSE .	ID
34	Transcript: N.H. Senate Judiciary Committee Meeting, Public Hearing on SB 591, testimony of NH AG John Formella, at 25:47 to 56:55, YOUTUBE (Feb. 20, 2024) https://www.youtube.com/live/DXmEbogAiSE .	ID
35	N.H. Senate Livestream, N.H. Senate Judiciary Committee Meeting, Public Hearing on SB 591, testimony of NH AG John Formella, at 25:47 to 35:50, YOUTUBE (Feb. 20, 2024) https://www.youtube.com/live/DXmEbogAiSE .	ID

Respectfully submitted,

PLAINTIFFS

Dated: August 25, 2025

By their attorneys,

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

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CERTIFICATE OF SERVICE

I certify that on August 25, 2025, 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.

/s/ W. Daniel Deane _____
W. Daniel Deane, Esq.