

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.

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

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

EXHIBIT	DESCRIPTION	CITED IN
13	NH Superior Court Form, Notice of Filing of Claim and [Partial] Stay	Mot. for Prelim. Injunction, Ex. A-7
14	YDC Claims Administration, Notice of Claim Form	Mot. for Prelim. Injunction, Ex. A-8
15	NH YDC Claims Administration and Settlement Fund, Public Bulletin – Letter from Administrator Broderick, June 30, 2025	Mot. for Prelim. Injunction, Ex. B
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	Mot. for Prelim. Injunction, Ex. C
17	Affidavit of John Doe #334, August 6, 2025	Ex. to forthcoming Reply Br.
18	NH AG Statement on Senate’s Passage of HB1677, May 5, 2022	Ex. to forthcoming Reply Br.
19	Email exchange with NH DOJ re: YDC Claims	Ex. to forthcoming Reply Br.
20	Letter to the Hon. J. Bradley re YDC Settlement Fund Legislation, February 5, 2024	Ex. to forthcoming Reply Br.
21	NH DOJ Statement on SB591 Being Signed Into Law, June 14, 2024	Ex. to forthcoming Reply Br.
22	Annmarie Timmins, “Victims’ attorneys who objected to YDC settlement fund support proposed changes,” <i>New Hampshire Bulletin</i> , February 20, 2024.	Ex. to forthcoming Reply Br.
23	Administrator’s Quarterly Report for the YDC Claims and Administration and Settlement Fund 1Q25 and Letter from John T. Broderick, April 16, 2025	Ex. to forthcoming Reply Br.
24	Administrator’s Quarterly Report for the YDC Claims and Administration and Settlement Fund 2Q25 and Letter from John T. Broderick, July 24, 2025	Ex. to forthcoming Reply Br.
25	N.H. YDC Claims Administration and Settlement Fund, Public Bulletin, Status of Administrator and Assistant Administrator, July 21, 2025, <a href="https://www.ydcclaims.nh.gov/sites/g/files/ehbemt701/files/inline-documents/sonh/ydcca-bulletin-administrator-and-assistant-administrator.pdf">https://www.ydcclaims.nh.gov/sites/g/files/ehbemt701/files/inline-documents/sonh/ydcca-bulletin-administrator-and-assistant-administrator.pdf</a>	Ex. to forthcoming Reply Br.
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, <a href="https://indepthnh.org/2025/07/22/ayotte-says-broderick-resigned-ydc-fund-post-he-says-i-didnt-resign-they-took-my-job-away/">https://indepthnh.org/2025/07/22/ayotte-says-broderick-resigned-ydc-fund-post-he-says-i-didnt-resign-they-took-my-job-away/</a>	Ex. to forthcoming Reply Br.
27	John T. Broderick, Jr., Op-Ed, <i>It’s Just Not Right</i> , InDepthNH.org, July 31, 2025, <a href="https://indepthnh.org/2025/07/31/john-broderick-its-just-not-right/">https://indepthnh.org/2025/07/31/john-broderick-its-just-not-right/</a>	Ex. to forthcoming Reply Br.
28	Affidavit of Deborah Greenspan, Esq., August 6, 2025	Ex. to forthcoming Reply Br.

EXHIBIT	DESCRIPTION	CITED IN
29	Affidavit of Dylan Gee, Ph.D., August 6, 2025	Ex. to forthcoming Reply Br.

Respectfully submitted,

**PLAINTIFFS**

Dated: August 6, 2025

By their attorneys,

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

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**CERTIFICATE OF SERVICE**

I certify that on August 6, 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.