

THE STATE OF NEW HAMPSHIRE

STRAFFORD, SS.

SUPERIOR COURT

STATE OF NEW HAMPSHIRE

v.

JOHN MADORE
DOCKET NO. 219-16-CR-0015

ASSENTED TO MOTION TO AMEND BAIL

NOW COMES, the defendant, John Madore, by and through defense counsel, Cynthia C. Robinson, Esq., and hereby moves this Honorable Court to amend bail in the above captioned matter to strike the no contact provisions and travel restriction of bail. In support of this Motion, the following is stated:

1. John Madore is charged with one count of Second Degree Assault, one count of Simple Assault, and one count of Reckless Conduct.
2. An arraignment was held in this matter on January 11, 2016 based on the new Felonies First Protocol.
3. Currently a provision of bail in these matters prohibits contact between the defendant and Theresa Madore, his mother, and Jacinta Madore, his sister. Subsequently, the parties have discussed the appropriateness of these conditions of bail and have agreed to amend bail to strike the no contact orders and add a provision of bail that "any violations of bail shall automatically revert the bail to cash with a hearing to be scheduled."
4. Kathryn Smykowski, Esq. is prosecuting this case for the State and assents to the granting of this Motion.

WHEREFORE, the defendant respectfully requests that this Honorable Court

- A. grant the defendant's motion to modify bail; OR
- B. conduct a hearing on this motion; AND
- C. grant such other and further relief as may be just and proper.

Respectfully submitted,
JOHN MADORE
By his attorney:

Motion Granted



Presiding Justice 1-19-2016

Brian T. Tucker
Presiding Justice

taxed/scanned

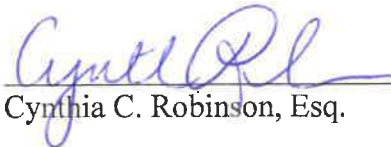
A. Cote 1-19-16



Cynthia C. Robinson, Esq.
Bar ID # 16489
NH Public Defender
15 Fourth Street, Suite 3
Dover, NH 03820
(603) 749-5540

CERTIFICATE OF SERVICE

I hereby certify that a copy of this motion has been forwarded this 19th day of January, 2016, to Kathryn Smykowski, Esq., Strafford County Attorney's Office.



Cynthia C. Robinson, Esq.