

**THE STATE OF NEW HAMPSHIRE**

**STRAFFORD, SS.**

**SUPERIOR COURT**

STATE OF NEW HAMPSHIRE

v.

TIMOTHY VERRILL

**Docket # 219-2017-CR-0072**

**SUPPLEMENTAL MOTION REGARDING RICHARD'S ISSUE**

**NOW COMES** prospective witness Michael Ditroia, by and through appointed counsel Robert J. Watkins, Esq., and respectfully gives supplemental notice that he is unlikely to exercise his right against self-incrimination if called to testify in this matter. In support thereof the following is stated.

1. Michael Ditroia has been subpoenaed by the Defendant to potentially testify in the above referenced matter. Mr. Verrill is charged with homicides alleged to have been committed in January 2017.
2. Because any alleged acts, or truthful testimony, that may cause Mr. Ditroia to exercise his right against self-incrimination occurred more than 6-years ago, the statute of limitations should preclude any State or Federal prosecution were he to acknowledge criminal behavior. Mr. Ditroia is not aware of any facts that would have tolled said statute.
3. Mr. Ditroia represents that he has not engaged in any acts post January 2017 that could cause him to exercise his right against self-incrimination. And therefore, a Richard's hearing is likely unnecessary.

Respectfully submitted,  
Michael Ditroia,

By his Attorney,

*/s/ R.J. Watkins*

Robert J. Watkins, Esq.

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**CERTIFICATION**

I hereby certify that on this date I electronically mailed a copy of the herein Motion to all interested parties through the Court's e-filing system.:

Date: 20<sup>th</sup> March, 2024

*/s/ R.J. Watkins*

Robert J. Watkins, Esq.