

The State of New Hampshire

Hillsborough, ss.

NH Superior Court

Hills. - South

CASE NO. 226-2019-CR-0814

State of New Hampshire

v.

HSCS-AUG 3'23AM10:58

Dale E. Holloway Jr.

Motion to Withdraw Waiver of Speedy Trial  
Due to ineffective Assistance of Counsel(s)

Now Comes the Defendant, Dale E. Holloway Jr., Pro se,  
pursuant to NH Constitution, Part the First,  
Article 15, who moves this Honorable Court  
to Accept this Motion to Withdraw Waiver of  
Speedy Trial (index #309) for the following:

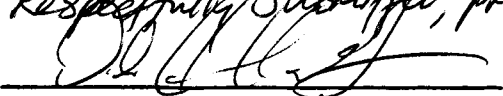
1. The Defendant, Dale E. Holloway Jr. was represented  
By Contract Attorney(s) on or about March 27, 2023  
(index #309), Waiver of Speedy Trial. (Attached).
2. Contract Attorney(s) have failed to communicate  
with Mr. Holloway in regards to Waiver of  
Speedy Trial prior to filing of such represent-

motion for His Defense in the Above Matter.

3. Prior to the filing of Waiver of Speedy Trial, the Prosecution was STALE AND [Speedy Trial] WAS [Overdue] (Since June 30, 2020). See Case Summary page 14 of 14 (Attached) In which, Contract Attorney(s) were retained by the Conflict Case office to provide competent representation to Mr. Holloway, in accordance with NH R. Prof'l Conduct, Rule 1.1, and instead disregarded Mr. Holloway's interest in raising arguments opposite of a Waiver of Speedy Trial. Whereas, Mr. Holloway experienced the (same) Deceit or Disloyalty and Misrepresentation by Contract Attorney(s) (Donna J. Brown and co-counsel Brian T. Lee) in the North case, known as ("Holloway II"). See Case Summary page 4 of 18 (Attached), in State v. Dale Holloway, Case No. 216-2019-CR-01856 (index #25, - index #28); Withdrawn. See index #29 (7/22/2020); NH RSA 604-A: 2-6 [Contract Attorney.] Also, showing the record reflects that the [Speedy Trial Overdue] has been [Removed] because of the Misrepresentation.

wherefore, the Defendant prays that this Honorable Court accepts this motion to withdraw Waiver of Speedy Trial (INDEX #309) Due to Ineffective Assistance of Counsel(s).


Any other such relief the Court deems fair and just.

Respectfully Submitted, pro se,  


Dale E. Holloway Jr. #117157  
NH SP-11  
P.O. BOX 14  
CONCORD, NH. 03301

Date: July 30, 2023

Denied

  
Honorable Charles S. Temple  
August 9, 2023

The Court considers this pleading as an invocation of the defendant's right to a speedy of trial after a properly filed waiver of speedy trial. As such, the jury trial remains on the docket as scheduled and the Court finds that the defendant has invoked his right to a speedy trial.

Clerk's Notice of Decision  
Document Sent to Parties  
on 08/10/2023

The State of New Hampshire

Hillsborough, ss.

NH Superior Court  
Hills. - South  
Case No. 2026-2019-CR-0814

State of New Hampshire

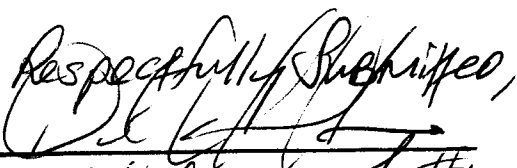
v.

Dale E. Holloway Jr.

Affirmation to Support

Under Oath, I Dale E. Holloway Jr. hereby depose  
and state that the following statements are  
True and Accurate:

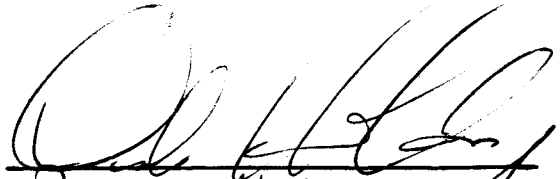
1. I am the Defendant in the above matter.
2. I am choosing to represent myself in  
the above case, including trial.

Respectfully Submitted,  
  
Dale E. Holloway Jr. #117157  
NHSP-M  
P.O. Box 14  
CONCORD, NH. 03301

Date: July 30, 2023

## Certificate of Service

I, Dale E. Holloway Jr. do Certify that the Enclosed  
Has been Sent via USPS First Class Mail, per  
NHDOC policy for free legal mail, to the Clerk  
of Court's office 30 Spring Street Nashua,  
N.H. 03060 for the State's Prosecution Team  
on this 30th day of July 2023.

  
Dale E. Holloway Jr.,  
Pro se