

STATE OF NEW HAMPSHIRE  
SUPERIOR COURT

HILLSBOROUGH, SS.  
Southern District

AUGUST TERM 2023

State of New Hampshire

v.

Danielle Dauphinais

226-2021-CR-0944

**STATE'S ASSENTED-TO STRUCTURING PROPOSAL**

NOW COMES the State of New Hampshire, by and through its attorneys, the Office of the Attorney General, and respectfully submits the following proposal for dates and deadlines for trial and pretrial matters in the above-captioned case. It is the State's understanding that the defendant will be waiving her right to a speedy trial.

Defense counsel was previously provided with a copy of this proposal, and they have advised the State that they assent to it, subject to either side's request to seek extensions or changes for good cause.

The proposed structuring proposal only sets deadlines for listed events, and the parties will endeavor to file any applicable pleadings prior thereto.

- |    |   |                            |
|----|---|----------------------------|
| 1. | Jury Selection                                  | October, 2024 <sup>1</sup> |
| 2. | State to provide Discovery:                     | Complete <sup>2</sup>      |
| 3. | State to provide notice of Rule 404(b) material | Complete <sup>3</sup>      |

<sup>1</sup> As of the submission of this Structuring Proposal, the Court does not have jury pool days scheduled for October 2024.

<sup>2</sup> To date, the State has provided defense with 7,041 pages of written discovery, 160 media discs, 5 external drives and 1 hard drive. The State will provide any additional discovery generated during the pendency of this matter pursuant to the continuing obligation set forth in N.H. R. Crim. R. 12(b)(7).

<sup>3</sup> The State provided 404(b) notice to defense counsel in a letter dated June 30, 2022.

Clerk's Notice of Decision  
Document Sent to Parties  
on 09/01/2023

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Approved and So Ordered



Honorable Charles S. Temple  
August 30, 2023

4.	Motions to Dismiss and discovery motions:	December 8, 2023 <sup>4</sup>
5.	State expert disclosure/CVs/reports:	Complete <sup>5</sup>
6.	Notice of defenses:	December 8, 2023
7.	Defense expert disclosure/CVs/ reports:	December 8, 2023
8.	Motions to Suppress:	December 8, 2023 <sup>6</sup>
9.	State's Rebuttal expert disclosure/CVs/reports:	January 8, 2024
10.	Pretrial evidentiary motions, including <i>motions in limine</i> :	March 13, 2024 <sup>7</sup>
11.	Depositions of expert/lay witnesses:	April 15, 2024
12.	Defense reciprocal discovery:	April 29, 2024
13.	State's anticipated trial witness list:	August 26, 2024
14.	Defendant's anticipated trial witness list:	September 2, 2024
15.	Proposed jury instructions:	September 20, 2024

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<sup>4</sup> The parties to provide witness lists 7 days before any scheduled evidentiary hearing on such motions.

<sup>5</sup> The State provided its expert witness disclosures in a letter dated February 24, 2023. State expert disclosures may be supplemented based on pending/anticipated forensic testing, additional expert reports and/or in response to notice of defenses and/or defense expert disclosure.

<sup>6</sup> The parties to provide witness lists 7 days before any scheduled evidentiary hearing on such motions.

<sup>7</sup> The parties to provide witness lists 7 days before any scheduled evidentiary hearing on such motions.

Respectfully submitted,

THE STATE OF NEW HAMPSHIRE

By its attorneys,

John M. Formella,  
Attorney General

Date: August 30, 2023

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**CERTIFICATION**

I certify that a copy of this proposal has been provided to counsel of record for the defendant, via the electronic case filing system.

August 30, 2023

/s/ *Bethany Durand*  
Bethany Durand, NH Bar ID # 273943