

STATE OF NEW HAMPSHIRE

CHESHIRE, SS

SUPERIOR COURT

Case No. 213-2011-CR-00216

State v.
Jason Talley

Motion to Extend Filing Deadline

Jason Talley moves this honorable Court to allow additional time to file documents pertaining to case number 213-2011-CR-00216, as well as time to conduct further investigation into his charges. In support of this motion Jason states the following.

1. The basis for being charged with indirect criminal contempt, disorderly conduct, and resisting arrest in this matter was founded on a court order enacted by Cheshire County Superior Court Presiding Justice John P. Arnold on July 15th 2011. The order was titled "Order In Reference To Administrative Order 2011-3" and outright banned the possession of electronic devices which could be used to record public officials and hold them accountable to the people they serve through the free press.

2. On January 31st 2012 when Mr. Talley and his now admitted Attorney-in-Fact appeared for a Pre-Trial Hearing before the Cheshire Superior Court, his representative in this matter, Bradley Jardis, was specifically allowed by court security to retain custody of his BlackBerry 9900 smartphone. Mr. Jardis specifically placed his Blackberry in a bin directly in front of the bailiff assigned to the metal detector and was allowed to retain custody of his device after completing the screening process. The BlackBerry 9900 has video recording capabilities.

3. Court security informed Mr. Talley when he was undergoing the screening process that the "Order In Reference To Administrative Order 2011-3" had been

rescinded.

4. As Mr. Talley alleges as a defense strategy that members of the NH Judicial Branch abused their authority by enacting this line of constitutional chilling court orders to cover up for criminal conduct on behalf of Keene Circuit Court Presiding Justice Edward Burke, the reason the ban was removed just prior to his trial in this matter is of potentially high significance to trial defense strategy.

5. Mr. Talley believes that as a result of the Judge Arnold's court order being rescinded, the possibility exists that additional evidence of judicial misconduct may exist that he has yet been unavailable to obtain to use while formulating his defense strategy in this case. He believes that it would be massively beneficial when presenting his defense to a jury the reasoning for why the order which banned the possession of recording devices was mysteriously rescinded, just prior to the beginning of his judicial proceedings.

6. Mr. Talley intends to use an extended filing period to request that this Honorable Court's authorize criminal depositions pursuant to RSA 517:13 in order to better untangle the web of court orders restricting Part I, Article 22 of the New Hampshire Constitution following a criminal act by a high ranking judicial officer. Determining precisely what was said in conversations, what private documents may exist, and what motivating factors existed at the time the original court orders were enacted would be massively important to Mr. Talley obtaining a fair trial. The evidence, as a whole, could prove to be exculpatory in the eyes of the jury.

7. The filing deadline set prior to this motion was January 31st 2012, the date that Mr. Talley and his Attorney-in-Fact became aware of the change in court order.

8. The trial, intended to start in February, was postponed as a result of the state tainting the jury pool. Mr. Talley never signed a speedy-trial-waiver in this matter.

Prayer for Relief

WHEREFORE, Jason Talley, requests this honorable Court grant the following relief:

- A. Extend the previously determined filing deadline of 01/31/12 to 02/29/12;
- and
- B. Grant any other relief this honorable Court deems just and proper.

Respectfully submitted,
Jason Talley

02/04/12

By
Bradley Jardis
42 Main Street #27
Dover, NH 03820

I hereby certify that on the above date, a copy of this motion was mailed to Assistant Cheshire County Attorney John Webb.

Bradley Jardis