STATE OF NEW HAMPSHIRE



CHESHIRE, SS. DOCKET NUMBER: 11-CR-216

SUPERIOR COURT FEBRUARY TERM, 2012

STATE OF NEW HAMPSHIRE

v.

JASON TALLEY

NOTICE OF NO OBJECTION TO DEFENDANT'S MOTION TO EXTEND FILING DEADLINE

NOW COMES the State of New Hampshire, by and through the Office of the Cheshire County Attorney, and hereby notifies the Court and defendant that the State has no objection to extending the filing deadline. In support of this notice, the State offers the following:

- 1. The defendant is charged with Contempt, Disorderly Conduct, and Resisting Arrest or Detention. Trial is scheduled for April, 2012.
- 2. The trial was previously scheduled for February. Based on the February trial date, a filing deadline of 1/31/12 was set. The defendant seeks an extension of that deadline.
- 3. Given the new trial date, the State does not object to extending the filing deadline.
- 4. The State reserves the right to object to future requests for depositions, or other motions which defendant may file, and does not, by filing this notice, intend to concede the truth of any factual allegations made by the defendant in his motion.

WHEREFORE, the State respectfully requests that this Court:

- a) Grant the defendant's motion without a hearing; or
- b) Hold a hearing on the matter, but only if deemed necessary; and
- c) Grant such other and further relief as this Court deems equitable and just.

Respectfully Submitted, STATE OF NEW HAMPSHIRE

John Webb #14620 Assistant County Attorney

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing objection will be forwarded on or about this day of February, 2012, to Bradley Jardis, acting as counsel for

the defendant.

John Webb

Assistant County Attorney

12 Court Street Keene, NH 03431