

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 grant him leave to file additional information regarding his prior “Notification of Criminal Defense.” This information will serve to further the Court’s knowledge of his intended, and previously declared, “*Effect of Ignorance or Mistake*” defense. In support of this motion Jason states the following:

1. Mr. Talley complied with Superior Court Rule 101 on 01/31/12 when he notified the Court that he intended to use the statutory “*Effect of Ignorance or Mistake*” defense. (see RSA 626:3)

2. The final pre-trial for this case was held on 03/27/12.

3. On 03/28/12 a New Hampshire State Representative provided Mr. Talley’s counsel with a memorandum from the New Hampshire Attorney General. Counsel believes that this memorandum, a warning from New Hampshire’s highest law enforcement authority to all law enforcement agencies and officers within the state, regarding the very same constitutional issues Mr. Talley was arrested for in this case, is an absolutely vital piece of evidence in proving his defense to his jury.

4. Mr. Talley requests this Honorable Court’s leave to file a “Modification of Planned Criminal Defense” so that he may make this argument further and preserve it for future appeal.

Prayer for Relief

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

- A. Extend the previous pre-trial motion filing deadline of 03/27/12 to 04/03/12;

and

- B. Grant any other relief this honorable Court deems just and proper.

Respectfully submitted,
Jason Talley

04/03/12

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 Associate Attorney General Richard Head and Assistant Cheshire County Attorney John Webb.

Bradley Jardis