

THE STATE OF NEW HAMPSHIRE

SUPREME COURT

_____ TERM

_____ SESSION

DOCKET NO. _____

(Cheshire Superior Court Docket No. 213-2013-CV-0098; 213-2013-CV0241)

City of Keene

v.

James Cleaveland, Garrett Ean, Kate Ager, Ian Bernard a/k/a Ian Freeman,
Graham Colson, and Pete Eyre

MOTION FOR AMICUS BRIEFS

NOW COMES City of Keene, by its counsel, Gallagher, Callahan and Gartrell, P.C., and requests this Court to solicit, request, and permit Amicus Briefs in this matter, and says as follows:

1. The legal issues on appeal have a significant impact on all public employees, public employers, and public representatives throughout the State of New Hampshire.

2. All public employees, their employers, and representatives will be affected at the state, county, and local levels of government by the lower court's decision and the legal issues on appeal at the New Hampshire Supreme Court.

3. City of Keene respectfully requests this Court to solicit, request, and permit Amicus Briefs in this matter before the Court pursuant to Supreme Court Rules 30 and 31 and its judicial discretion.

WHEREFORE, City of Keene respectfully requests the following affirmative relief:

- A. Issue an announcement to solicit, request, and permit amicus briefs or memoranda regarding the pending matter before the Court; and
- B. Grant such further relief as may be proper and just.


Respectfully submitted,

CITY OF KEENE

By Its Attorneys,

GALLAGHER, CALLAHAN & GARTRELL, P.C.
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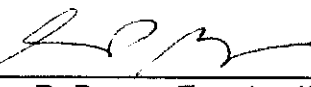
Dated: 12/23/13

By: 
Charles P. Bauer, Esquire (#208)

CERTIFICATE OF SERVICE

I hereby certify that I have this date forwarded a copy of the foregoing to Jon Meyer, Esquire, Counsel for Ian Bernard f/k/a Ian Freeman, Garrett Ean, James Cleaveland, Kate Ager, Graham Colson, Peter Eyre, *Pro Se*, and Thomas Mullins, Esq.

Dated: 12/23/13

By: 
Charles P. Bauer, Esquire (#208)