

STATE OF NEW HAMPSHIRE

HILLSBOROUGH, SS

6<sup>th</sup> CIRCUIT – DISTRICT DIVISION  
HILLSBOROUGH

The State of New Hampshire

Case No. 444-2024-CR-00109

v.

Joseph Hart

**MOTION FOR CONTINUACE**

Mr. Hart moves this Honorable Court to delay the date of his trial due to his pre-trial investigation and collection of records not being complete. In support of this Motion he states the following:

1. The State of New Hampshire has charged Mr. Hart with Criminal Trespass and Disorderly Conduct. A trial date is scheduled for May 21<sup>st</sup> at 1:00PM.
2. Mr. Hart has been working diligently since 4/10/24 to collect evidence for his RSA 626:3 II. and “Entrapment by Estoppel” defense to the charges he is facing. This evidence consists of “Advance Notice Forms” from various District Courts showing that he had been authorized to audio and video record without signing his name accurately on the forms.
3. A letter was sent on 4/10/24 and 4/22/24 to the Concord District Court seeking these forms and the forms have not been received yet. On today's date, 5/7/24, counsel did speak to the Circuit Court-District Division hot-line to seek assistance in finding out why the forms have not yet been provided.
4. This is Mr. Hart's first request for a continuance. It is made in good faith and necessary to continue building his defense to the charges filed.
5. Counsel will be out of the area and unavailable from 06/14/24 to 06/24/24 so he respectfully requests a trial date other than between those dates.

**Prayer for Relief**

WHEREFORE, Joseph Hart requests this Honorable Court to order the following relief:

- A. Continue his trial date to any date other than between 06/14/24 to 06/24/24; and
- B. Grant any other relief this Honorable Court deems just and proper.

Respectfully submitted,

Joseph Hart  
PO Box 833  
Keene, NH

By Bradley Jardis

5/7/24

**PURSUANT TO CIRCUIT COURT-DISTRICT DIVISION RULE 1.8 (B), THIS MOTION BEING GROUNDED IN BOTH FACT AND NOTICE PLEADING, COUNSEL ACKNOWLEDGES THAT MAKING FALSE STATEMENTS COULD SUBJECT HIM TO CRIMINAL PENALTIES.**

**PURSUANT TO CIRCUIT COURT-DISTRICT DIVISION RULE 1.8 (C), A GOOD FAITH ATTEMPT TO OBTAIN CONCURRENCE HAS BEEN MADE WITH ATTORNEY GEORGE WATTENDORF TO CONTINUE THE TRIAL DATE. ATTORNEY WATTENDORF HAS CONCERNS FOR THE SCHEDULING OF JUDGE SUSAN ASHLEY'S SCHEDULE AND DOES NOT CONCUR WITH THIS REQUEST.**

I hereby certify that on the above date, a copy of this Motion was mailed to Attorney George Wattendorf.

Bradley Jardis  
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