THE STATE OF NEW HAMPSHIRE
SUPERIOR COURT

HILLSBOROUGH, SS.
Northern District

JANUARY TERM, 2009

State of New Hampshire

v.

Michael Addison

No. 07-S-0254

STATE'S ASSENTED-TO MOTION TO EXTEND TIME TO RESPOND TO DEFENDANT'S POST-TRIAL PLEADINGS

NOW COMES the State of New Hampshire, by and through its attorneys, the Office of the Attorney General, and moves extend time to respond to the defendant's post-trial pleadings. In support of this motion, the State says as follows:

1. The defendant was convicted of capital murder and sentenced to death on December 18, 2008. On December 29, 2008, the defendant filed an assented-to motion to extend time the 10-day time-frame to file post-trial motions. See N.H. S. Ct. R. 7(1)(C). This Court granted the motion to extend time that same day. The defendant filed five motions and a supplemental pleading on January 16, 2009.

2. The State moves to extend the deadline to respond to the defendant's motions to February 16, 2009. The defendant's motions require research and substantive response. Undersigned counsel is currently working on the appellate brief for the State v. Antoine Bell Rogers case which is due February 6, 2009, as well as other cases.

3. Counsel for the defendant has been contacted and does not object to the motion to extend time.

WHEREFORE, the State of New Hampshire respectfully requests that this Honorable Court:

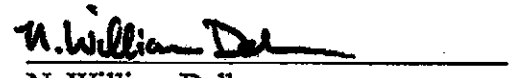
A. Grant the State's motion to extend time to respond to the defendant's post-trial motions until February 16, 2009; and

B. Order such further relief as this Court deems just and equitable.

Respectfully submitted,

THE STATE OF NEW HAMPSHIRE
By its attorneys,

January 21, 2009



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CERTIFICATE OF SERVICE

I certify that a copy of this pleading has been mailed to Richard Guerriero, Esquire, David Rothstein, Esquire, and Caroline Smith, Esquire.

January 21, 2009

N. William Delker

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