

STATE OF NEW HAMPSHIRE

ROCKINGHAM, SS

SUPERIOR COURT

No. 217-2022-CV-00798

Jane Doe #55

v.

State of New Hampshire, New Hampshire Department of Health and Human Services, et al.

DEFENDANT NASHUA CHILDREN'S HOME'S TO DISMISS
PLAINTIFF'S COMPLAINT

NOW COMES Defendant Nashua Children's Home, which respectfully moves for the dismissal of Plaintiff's Complaint against it in this lawsuit as this action was filed after the expiration of the applicable statute of limitations, and as the Complaint fails to state a cause of action against it.

In support of this Motion, Defendant respectfully refers the Court to the accompanying Memorandum of Law.

WHEREFORE Nashua Children's Home, by and thorough counsel, respectfully requests that the Court:

- A. Dismiss the Plaintiff's Complaint with prejudice and close the Court's file;
- B. Order such further relief as justice may require.

Respectfully submitted,
Nashua Children's Home
By its attorneys:
Bouchard, Kleinman & Wright, P.A.

/s/ Paul Kleinman
Paul Kleinman, Esq. - NH Bar #2852
799 Mammoth Road
Manchester, NH 03104
603-623-7222
Pkleinman@bkwlawyers.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was this date served via the Court's Electronic Case Filing System to all parties of record.

Dated: April 28, 2023

By: /s/ Paul Kleinman
Paul Kleinman, Esq. - NH Bar #2852