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December 6, 2018

VIA HAND DELIVERY

Tracy Uhrin, Clerk
Merrimack Superior Court
163 N. Main Street
PO Box 2880
Concord, NH 03301



Re: Spec Bowers v. Town of New London Zoning Board of Adjustment;
Case No.: 217-2018-CV-00469

Dear Clerk Uhrin:

Enclosed for proper filing with this Court is the Town of New London Zoning Board of Adjustment's Assented-to Motion to Enlarge Time to File Memoranda if Law relative to the above-captioned matter.

I hereby certify that a copy of this letter and the enclosure was mailed to Spec Bowers at 1373 Rt 11, Box 323, Georges Mills, N.H. 03751.

Sincerely,

Barton L. Mayer
bmayer@uptonhatfield.com

BLM/cab

Enclosure(s)

cc: Spec Bowers
Zoning Board of Adjustment
Kimberly Hallquist, Esq., Town Administrator

10 Centre Street, PO Box 1090, Concord, NH 03302-1090
Concord – Hillsborough – Jaffrey – Peterborough – Portsmouth

STATE OF NEW HAMPSHIRE

MERRIMACK, ss

SUPERIOR COURT

Case No. 217-2018-CV-00469

Spec Bowers

v.

Town of New London Zoning Board of Adjustment

**ASSENTED-TO MOTION TO ENLARGE TIME
TO FILE MEMORANDA OF LAW**

NOW COMES, the Town of New London Zoning Board of Adjustment, by and through its attorneys, Upton & Hatfield, LLP, and respectfully moves that this Honorable Court enlarge the time within which to file Memoranda of Law, and as grounds therefore states as follows:

1. Currently pending before the Court is a Motion to Dismiss, filed on behalf of the Town of New London Zoning Board of Adjustment (“ZBA”), and a Motion for Summary Judgment, filed by the plaintiff.
2. The Orders of Notice required the parties to file Memoranda of Law by December 5, 2018.
3. A ruling on either party’s motion would render the filing of a Memorandum of Law moot.
4. Granting this motion will preserve scarce judicial resources, and avoid an unnecessary expenditure of legal fees on the part of the parties.
5. The plaintiff assents to the relief requested herein.

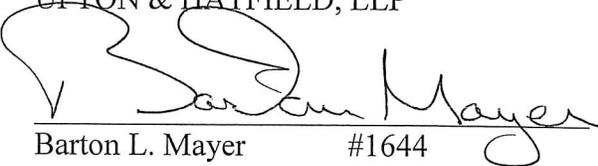
WHEREFORE, the Town of New London ZBA respectfully prays that this Honorable Court:

- A. Allow the parties to file Memoranda of Law within two days after the Court issues its orders on the pending motions; and
- B. Grant such other and further relief as may be just and equitable.

Respectfully submitted,
TOWN OF NEW LONDON
By its attorneys,
UPTON & HATFIELD, LLP

Dated: December 6, 2018

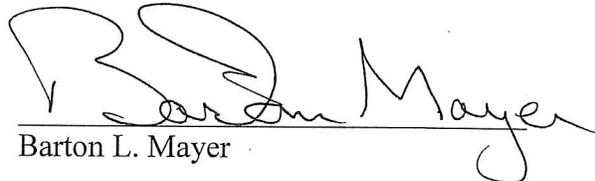
By:



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CERTIFICATE OF SERVICE

I certify that a copy of this Assented-to Motion to Enlarge Time to File Memoranda of Law was mailed to Spec Bowers, *Pro se*.



Barton L. Mayer