

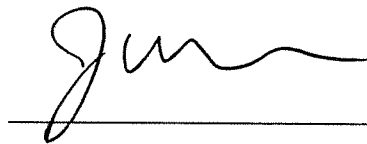
NOTICE

Any party opposing this motion shall file a memorandum and any supporting affidavits or other documents no later than 21 days after filing of the motion, unless another time is set by the court. Failure to file timely opposition will be deemed a waiver of all objections to the motion, which may be granted without further notice or hearing.

CERTIFICATE OF SERVICE

I hereby certify that on this date I mailed a copy of this motion to dismiss to:

Melissa L. Martin
Pine Tree Legal Assistance
PO Box 547
88 Federal Street
Portland ME 04112



Jeffrey Woodburn

Date: 8/9/24

8.13.24 order

The defendant is NOT
under an order of
this court restricting

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AUG 12 '24 PM 12:09

A True Copy

Attest: Shelley Sawyer
Clerk of Courts

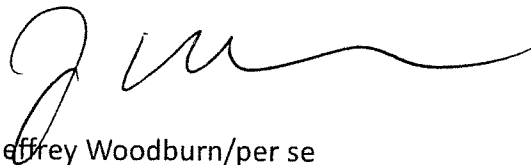
his travel to Maine. The defendant
shall appear in person on 8.23.24
or via zoom, if he contacts the clerk
for a link. Shelley Sawyer

- A. It is unjust for the defendant to be summoned to Maine to defend himself against allegations that were fully disposed of in New Hampshire's courts. The plaintiff is attempting to re-litigate such matters as this 6-year legal ordeal is coming to an end. The plaintiff will receive no additional legal protection from having two protection from abuse (PFA) orders than one. But as such proceedings are public and the New Hampshire media have shown an interest in reporting on the matter, the defendant's reputation will likely be harmed.
- B. It is unreasonable and gravely difficult for the defendant to defend himself in a jurisdiction that is 105-miles from his residence, where he is not knowledgeable of the state's legal process or does not know any licensed Maine attorneys. For example, the defendant was provided service on July 12, 2024 for a July 19, 2024 hearing and subsequently filed a motion to continue. The defendant was unaware that the document, unlike New Hampshire's court filing rules, required an original signature and was ruled an incomplete filing. Further, it is inconvenient for the defendant to arrange witnesses and authenticate evidence from New Hampshire, where the plaintiff's allegations occurred and were litigated.

WHEREFORE the defendant respectfully requests that this Court grant said relief and for such further relief as may be just.

Respectfully Submitted,

Dated: August 7, 2024



Jeffrey Woodburn/per se
30 King Square, Whitefield, NH 03598
603.259.6878

8.13.24 order

motion to be heard on

8.23.2024.

Jeffrey
Judge

A True Copy
Attest: Shelly Sawyer
Clerk of Courts