

STATE OF NEW HAMPSHIRE

HILLSBOROUGH COUNTY  
SOUTHERN DISTRICT

SUPERIOR COURT

#226-2022-cv-00309

Laurie Ortolano

v.

City of Nashua  
and  
201 Main Street Real Estate Corporation  
201 Main Street Financing Corporation

**and**

#226-2023-cv-00110

Laurie Ortolano

v.

City of Nashua

**MOTION FOR PROTECTIVE ORDER RE: CITY COUNSEL**

The City of Nashua (“City”), a defendant in the above matter, respectfully moves for a motion for protective order regarding its Counsel, on the following grounds:

1. On October 20, 2023, the plaintiff attempted to serve trial subpoenas on Attorneys Bolton and Leonard, as described in her own email attached to this motion.
2. This Court has previously ruled that these attorneys of record for the City are not necessary witnesses.
3. The plaintiff is plainly aware of this, as she has recently asked the Court to revisit this ruling, a motion that is without merit (as will be shown by the City’s objection).

4. Even if the recent motion should have any merit, the plaintiff undertook to serve these attorneys, flouting the Court's earlier ruling and violating Rule 36(d)(5)(i) pertaining to notice when seeking testimony from counsel of record.

5. The Court should not countenance this flagrant misbehavior by the plaintiff, and issue a protective order against such further misconduct.

Respectfully submitted,

**City of Nashua,**

By its Counsel,

**UPTON & HATFIELD, LLP,**

Date: October 24, 2023

By: /s/ Russell F. Hilliard  
Russell F. Hilliard; NHBA #1159  
159 Middle Street  
Portsmouth, NH 03801  
(603) 436-7046  
rhilliard@uptonhatfield.com

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has this day been forwarded through the Court's electronic filing system to Laurie Ortolano, *pro se*, and to all counsel of record.

/s/ Russell F. Hilliard  
Russell F. Hilliard

## Sharon E. Mallon

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**From:** Laurie Ortolano <laurieortolano@gmail.com>  
**Sent:** Friday, October 20, 2023 8:53 PM  
**To:** Board of Aldermen; Russell F. Hilliard; joseph.foster@mclane.com; Mark Cornell; Sara Greene; Steadman, Graham; Laura Colquhoun  
**Subject:** My Attempt to deliver a subpoena to Attorney Bolton

I am preparing for my RTK Trial in mid-December on the downtown barriers, the Arts Center and tax incremental financing Committee and I needed to serve subpoenas to people I want to have as witnesses for my Trial.

Attorney Bolton proved to be a hostile denier of the subpoena. He refused to be served by me because, as he told me and three police officers, he doesn't speak with me.

I tried to serve Mr. Bolton and Ms. Leonard on my own by ringing the legal office doorbell. Someone answered the doorbell but hung up when they saw me. I rang again, to no avail. I called the office phone and left a message that I was in the hallway and wanted to serve the subpoena for the December Trial. Asked if someone could call me back and provide me with a time to drop off. No one returned the call.

About 15 minutes later, three officers arrived to provide support in trying to help me get the subpoenas served. This time when I rang the bell, the clerk answered right away. The police presence triggered the bell to be answered! Of course, I asked if Attorney Bolton and Leonard were there to accept the documents.

The Clerk went and got Bolton, he responded with "to whom am I speaking", I responded and then he stated that "I don't talk to you." and hung up immediately. A couple of minutes later, I told the officers I was going to ring the doorbell again and see if Leonard would take the subpoena because I was unaware if she had a "I don't talk to you" policy as well. The Clerk answered that Leonard was not in the office. The clerk did not know when she would be in. I then asked her to inform Bolton that I did not need to speak with him but just hand the subpoena over. The Clerk, who has just finished talking to me, now informed me that she is not allowed to talk with me. The Clerk's most always accept summons and subpoena's for the legal office, but not for Laurie Ortolano.

It is now in the hands of the Sheriff's Office to deliver to the Bolton and Leonard.

Bolton's conduct is so outside the pale of reasonable or justified. He drives costs up for everyone (I hate making the sheriff's office chase these people down) He is an embarrassment and disgrace to this City and sadly, he is exactly the kind of chaos and corrupted Attorney that the Nashua Court system and Judge's love. The Judges seem to want that constant disruption and support the violations of conduct, he frequently exhibits, in their courtrooms.

Nashua has been trying to hire an assistant for Attorney Bolton since February 14, 2023 and no one has filled the position. Any surprise here? Who in their right mind would train under an Attorney with a well documented alcoholism problem, who suffered a stroke, is always angry and hollering and is ridiculously obnoxious and unreasonable. Would you want to build your reputation off of Mr. Bolton's reputation? Thank you Mayor Donchess for another fine top level management selection.

Thank you to Lori Wilshire, Mike O'Brien, John Griffin, Mayor Donchess, Deb Novotny (who gave me the option to deliver to McLane Middleton legal office), and Marylou Blaisdell for accepting the subpoena politely and professionally.

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