

**MCGRATH LAW FIRM**  
*A Professional Association*

20 MONTGOMERY STREET  
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HAND DELIVERED

August 5, 2015

William McGraw, Clerk  
Merrimack Superior Court  
163 North Main Street  
P.O. Box 2880  
Concord, NH 03302-2880

Re: *Estate of Hagen Esty-Lennon v. State of New Hampshire*

Dear Clerk McGraw:

Enclosed for filing in the above-matter is an original and two copies of a Emergency Petition for Preliminary and Temporary Injunctive Relief. Also enclosed is our check in the sum of \$260.00 for the filing fee.

Should you have any questions regarding the enclosure, please feel free to contact me.

Very truly yours,

Peter G. McGrath, Esq.

PGM:ddr  
Enclosures  
cc: Client  
Susan Morrill, Esq.  
Diane Puckhaber, Esq.

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STATE OF NEW HAMPSHIRE  
MERRIMACK COUNTY SUPERIOR COURT  
ESTATE OF HAGEN ESTY-LENNON

v.

STATE OF NEW HAMPSHIRE  
c/o Attorney General's Office  
33 Capitol Street  
Concord, NH 03301

Docket No.

**EMERGENCY PETITION FOR PRELIMINARY AND TEMPORARY  
INJUNCTIVE RELIEF**

NOW COMES the Petitioner, ESTATE OF HAGEN ESTY-LENNON, by and through counsel, McGrath Law Firm, P.A., and respectfully submits this Emergency Petition for Preliminary and Temporary Injunctive Relief.

IN SUPPORT THEREOF, the Petitioner states as follows:

1. Hagen Esty-Lennon was killed on July 6, 2015.
2. The videotape regarding the shooting of the deceased is scheduled for release on August 5, 2015.
3. The videotape is very graphic, violent, bloody and upsetting.
4. The deceased has two minor children.
5. The release of the videotape is very concerning to the family.
6. Counsel requests they be able to meet with the State to agree on what can be released to the news media.
7. We anticipate that news outlets have filed a Right to Know request and that they will want to join in and be notified.

- 8. We will seek to meet with the State of New Hampshire news outlets and agree on a limited release of certain segments of the video.
- 9. We have the assent of the mother of Hagen's children.
- 10. The Attorney General's Office, Susan Morrill, Esquire has been contacted regarding this Petition and neither assents nor objects to the filing of this Petition.
- 11. Diane Puckhaber, who represents the mother of the minor children, has been contacted regarding the filing of this Petition and assents to same.

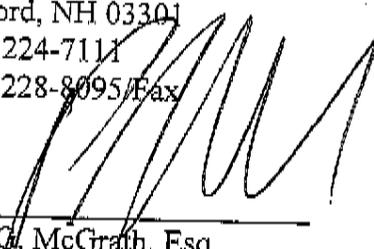
WHEREFORE, the Petitioner prays the Honorable Court:

- A. Grant this Petition for Preliminary and Temporary Injunctive Relief;
- B. Schedule an immediate hearing;
- C. Enjoin Respondent from releasing the videotape; and
- D. Grant such other and further relief as is just and proper.

Respectfully submitted,

Estate of Hagen Esty-Lennon

By Their Counsel  
 McGrath Law Firm, P.A.  
 20 Montgomery Street  
 Concord, NH 03301  
 (603) 224-7111  
 (603) 228-8095/Fax

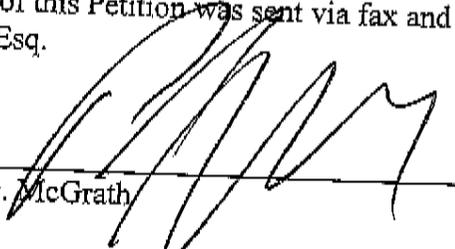


Date: 8/6/15

By: \_\_\_\_\_  
 Peter G. McGrath, Esq.  
 Bar No. 5564

CERTIFICATE OF SERVICE

I, Peter G. McGrath, certify that on this date a copy of this Petition was sent via fax and U.S. Mail to Susan Morrill, Esquire and Diane Puckhaber, Esq.

  
Peter G. McGrath

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