

NEW HAMPSHIRE  
**UNION LEADER**

Open up New Hampshire.

MERRIMACK COUNTY

TRUST DOCKET  
6<sup>TH</sup> CIRCUIT COURT  
PROBATE DIVISION

VALERIE C. SANTILLI et al  
v.  
NATHAN JAMES CARMAN  
313-2017-EQ-00396

MOTION TO UNSEAL ALL PETITIONS, MOTIONS, EXHIBITS AND OTHER DOCUMENTS

Now comes the Union Leader Corp., the publisher of a statewide newspaper and website, and petitions the Court to unseal all records in this case in accordance with the federal and New Hampshire Constitutions, state law and court rulings.

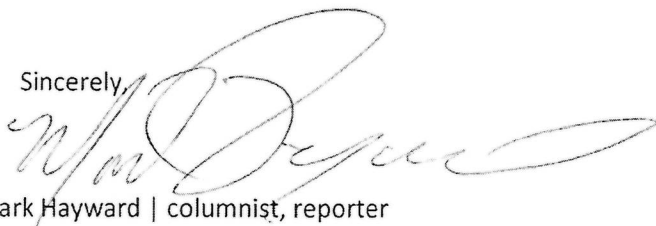
In doing so, this petitioner asserts:

- 1) The Court on March 26 noted the “lack of an objection to keeping them (trust documents) sealed.” Please note this as a formal objection to sealing the trust documents as well as any other documents in this case.
- 2) In discussing the release of documents, the Court notes the “ongoing investigation of a serious homicide,” this petitioner knows of no efforts by law enforcement agencies to petition the Court to keep information in this case sealed.
- 3) In their motion to seal the trust documents, petitioners state that disclosure “will feed an existing media frenzy surrounding the Chakalos family.”

Hence, this petitioner asks,

- 1) That all previously sealed records be made available for public examination and copying, or at the very least be examined in camera and then ruled on whether they should be released.
- 2) If the Court determines that any material is exempt from disclosure, that the Court redact only the least amount of material necessary to comply with the law, and identify which provision of the law necessitates the redaction.
- 3) Subject all futures requests for sealed filings to the above process.
- 4) Not close your courtroom for the April 3 hearing or any future hearings in this matter.
- 5) Issue whatever orders are deemed just and equitable.

Sincerely,



Mark Hayward | columnist, reporter

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CERTIFICATION OF COPIES TO PARTIES

I certify that on this date I have provided copies of MOTION TO UNSEAL ALL PETITIONS, MOTIONS, EXHIBITS AND OTHER DOCUMENTS to the parties who have filed an appearance in this case.

Either by

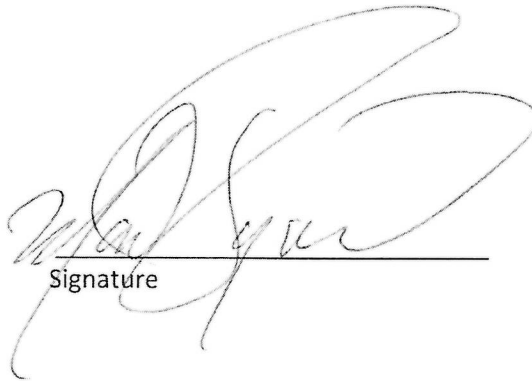
US Mail

or

Email

3/20/2018

Date



Signature

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