

**THE STATE OF NEW HAMPSHIRE**  
**JUDICIAL BRANCH**  
<http://www.courts.state.nh.us>

Court Name: Rockingham - Superior Court  
Case Name: Daniel Richard, et al. v. Christopher T Sununu, et al.  
Case Number: 218-2021-CV-01160  
(if known)

**COMPLAINT**

Requested:  Jury Trial (as allowed by law)  Bench Trial

1. Plaintiff's Name Daniel Richard  
Residence Address 95 Rockingham Rd., Auburn, NH 03032  
Mailing Address (if different) \_\_\_\_\_  
Telephone Number (Home) \_\_\_\_\_ (Mobile) (603) 315-5755  
[See Attachment(s), item 'Additional Plaintiff(s)']

2. Defendant's Name Christopher T Sununu  
Residence Address State House, 107 North Main Street, Concord, NH 03301  
Mailing Address (if different) \_\_\_\_\_  
[See Attachment(s), item 'Additional Defendants(s)']

3. First thing that happened (in one sentence):  
Exparte Motion and Motion Interim Emergency Relief For Temporary Stay and an Order  
to Show Cause

4. Second thing that happened (in one sentence):  
The Court Shall Take Judicial Notice of the Governor's Testimony and Motion for a  
Permanent Injunctive Relief, Motion for Declaratory Judgement

5. Third thing that happened (in one sentence):  
Plaintiffs bring this Motion for a Temporary Stay, Motion for Injunctive Relief, and  
Motion for Declaratory Judgement against Christopher T. Sununu the Governor of the  
state of New Hampshire, the Executive Council, and the Joint Legislative Fiscal  
Committee in their official capacity.

Continue on using separately numbered paragraphs (attach additional sheets if necessary).

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For the reasons stated in this Complaint, I request that the Court issue the following orders:

A. Describe the orders you want the Court to make:

A. An expedited emergency stay order to preliminary and permanently enjoin Governor Sununu, his respective agents, officers, employees, and all other persons acting on behalf of the executive branch from enforcing any undelegated powers by colorable state or federal, statutes, rules, or regulations written pursuant to any colorable state or federal acts.

B. All other relief the Court deems fair and just. [See Attachment(s), 'Item A' (continued)]

Daniel Richard  
Name of Filer

/s/ Daniel Richard

11/18/21

Signature of Filer

Date

(603) 315-5755

Law Firm, if applicable Bar ID # of attorney

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95 Rockingham Rd.

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City State Zip code

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Signature page for: COMPLAINT (document)

Kelley L Potenza  
Name of Filer

/s/ Daniel Richard with permission of  
Kelley L Potenza 11/18/21  
Signature of Filer Date

\_\_\_\_\_  
Law Firm, if applicable Bar ID # of attorney

(978) 808-1066  
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75 South Main Street, Unit 7-229  
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City State Zip code

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Thomas W Chapmon  
Name of Filer

/s/ Daniel Richard with permission of  
Thomas W Chapmon 11/18/21  
Signature of Filer Date

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Signature of Filer Date

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