

*STATE OF NEW HAMPSHIRE*

MERRIMACK, SS

SUPERIOR COURT

In re: Dunbarton School District

Docket No. 217-2018 CV 379

MOTION TO INTERVENE ON BEHALF OF A GROUP OF  
TAXPAYERS IN OPPOSITION TO THE  
PETITION FOR A SPECIAL DISTRICT MEETING

INTEREST IN THIS LITIGATION

As a longtime resident of the town of Dunbarton, and having owned property and having overpaid taxes for all of the years that this accounting error had been going on, I believe that I meet the threshold for standing in this case. Although a general interest in the government obeying the rules is not sufficient to confer standing on a taxpayer, when “taxpayer has a sufficiently personal and concrete interest” in the suit, they can have standing. It is undisputable that our household tax bill will be affected if either of the warrant articles proposed by the District is adopted at a special meeting. Thus, I believe that I have met the “personal and concrete interest” requirement regarding the outcome of this litigation. Therefore, I believe I have standing to object to the District’s request for a special meeting.

As the current elected State Representative for the Town, I have been contacted by a number of residents and have drafted the objection to the petition. This was co-signed by several of the taxpayers in the district. On behalf of the several taxpayers who signed the motion to dismiss, I would ask that the court grant me permission to speak on behalf of these citizens as some of them will be working during the potential hearing.

Respectfully submitted:

JR Hoell  
32 Ordway Road  
Dunbarton, NH 03046

State Representative  
Merrimack 23  
Bow and Dunbarton.

CERTIFICATION

I, JR Hoell, Resident of Dunbarton, hereby certify that on this day, the 11<sup>th</sup> of July, I have hand delivered this document and supporting exhibits to the the office of the Superintendent of SAU #67

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By JR Hoell, July 11th