

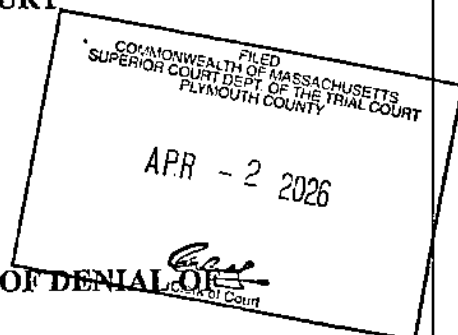
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COMMONWEALTH OF MASSACHUSETTS

PLYMOUTH, SS

PLYMOUTH SUPERIOR COURT
NO. 2383CR00198COMMONWEALTH
VS.

LINSDAY CLANCY

**DEFENDANT'S MOTION FOR RECONSIDERATION OF DENIAL OF
MOTION FOR BIFURCATED TRIAL**

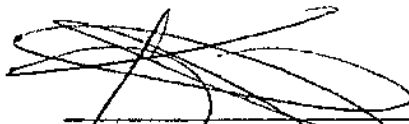
Now comes the defendant, Lindsay Clancy, in the above captioned matter and respectfully moves this Court for an order reconsidering the denial of the defendant's motion for bifurcation.

In support hereof the defendant states that the issue of the actions that resulted in the death of the decedents in the indictments at the bar is not a live issue and the defendant is willing to stipulate formally in writing to her involvement in the underlying conduct resulting in the death of the three young children. With that understanding, the defendant submits that the only live issue for consideration at trial would be the defendant's state of mind as it relates to the defense of lack of criminal responsibility.

The defendant understands that the government has a right to "prove its case" but where there is an agreement for a stipulation the defendant submits that it is elevating form over substance to require a full blown trial on the issue of culpability as opposed to criminal responsibility.

Wherefore the defendant requests that the court enter an order allowing bifurcation of the trial with the understanding that the stipulation of the defendant would be presented to the jury as it relates to the actual factual predicate for the conduct resulting in the death of the children.

Lindsay Clancy,
By her attorney



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