

COMMONWEALTH OF MASSACHUSETTS

PLYMOUTH,SS

PLYMOUTH SUPERIOR COURT
NO. 2383CR00198

COMMONWEALTH

VS.

LINDSAY CLANCY

DEFENDANT'S MOTION FOR ADDITION TO LIST OF WITNESSES

Now comes the defendant, Lindsay Clancy, in the above numbered indictment, through counsel, and respectfully moves this Court for permission to add to the defendant's List of Witnesses;

- Emily Thorndike, LICSW

Ms. Thorndike is presently the owner and licensed independent clinical social worker of the Wise Mind Therapy Practice. She graduated from Dover-Sherborn High School, received a Bachelor of Arts in Sociology from Hartwick College in 2013 and a Master's Degree in Social Work from Boston College in 2019. She is licensed in the Commonwealth of Massachusetts as LCSW (2019) and LICSW (2021).

Ms. Thorndike was employed at the McLean Hospital in the short term unit (STU). She was employed for five years as a mental health specialist (MHS) from May of 2014-May 2019 and clinical social worker/case manager from September

of 2019 to December 2021. She worked in the short term unit for approximately seven years and seven months.

Ms. Thorndike literally worked the unit that Lindsay Clancy was presented to on New Year's 2022/2023. She left a year prior to Lindsay's admission. A copy of her curriculum vitae is attached. Of particular interest is while employed by McLean she was a community resource counselor, a social work intern and social work clinical case manager.

Ms. Thorndike would testify based solely upon her first-hand observations and eight years of experience while employed at McLean Hospital's short term unit between 2014 and 2021. As indicated, she was not employed on the unit during Lindsay's admission and she has no personal knowledge of Lindsay Clancy, her treatment, medical record or care.

Ms. Thorndike's testimony would be limited to her experience and observations of the routine policies, staffing structure, clinical roles, patient care practice and operation of the short term unit as personally observed during her employment at McLean. Ms. Thorndike left McLean to start her own business. She had no disciplinary issues or personality conflicts with McLean's management and, in fact, has friends and associates that are still employed there.

Ms. Thorndike was incensed over the cross-examination of Patrick Clancy wherein the prosecutor intimated that McLean Hospital was one of the best

hospitals in the country and that Lindsay Clancy was offered a number of therapeutic and counselling type interventions while at McLean from December 31, 2022 through January 4, 2023. Ms. Thorndike would testify to the actual facts of the staffing and lack of resources during weekend and holiday periods as well as the repeated use of clay, coloring books and purported group therapy sessions, supervised by unqualified individuals who no psychiatric or social work experience.

The defendant is entitled to present rebuttal evidence to the government's misleading cross-examination of Patrick Clancy where the government portrayed McLean Hospital as being a five star facility, bending over backward to, in effect, provide Lindsay with appropriate counselling, therapy and treatment while she was there for the short term stay prior to her discharge after being cleared by the management at McLean Hospital.

Defense counsel and Lindsay Clancy have never met, spoken to or had any relationship whatsoever with Ms. Thorndike. In fact, Ms. Thorndike did not reach out to counsel but rather when counsel observed a post that she put on Tik Tok which was relevant, material and directly contradictory to the impression created by the government on cross-examination of Patrick Clancy, counsel's private investigator, Robert Jones, of Fairhaven, Massachusetts, reached out to and