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**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

STATE OF IDAHO,

Plaintiff,

V.

BRYAN C. KOHBERGER,

Defendant.

CASE NUMBER CR01-24-31665

MOTION FOR FRANKS HEARING

COMES NOW, Bryan C. Kohberger, by and through his attorneys of record, and moves the court to conduct a *Franks* hearing. This motion is made pursuant to the Fourth Amendment of the United States Constitution, Article 1, §17, of the Idaho Constitution, and *Franks v. Delaware*, 438 U.S.164 (1979). A proffer and exhibits are filed contemporaneously in support in accordance

with *State v. Fischer*, 140 Idaho 365 (2004). The parties stipulate to the sealing of the proffer and exhibits. A stipulation is filed contemporaneously. The under seal proffer and exhibits are being provide to opposing counsel and court staff via email on the date of this motion. Hand delivery to the court for in person filing will occur no later than November 18, 2024.

DATED this 14 day of November, 2024.



ANNE C. TAYLOR
ANNE TAYLOR LAW, PLLC

CERTIFICATE OF DELIVERY

I hereby certify that a true and correct copy of the foregoing was personally served as indicated below on the 14 day of November, 2024 addressed to:

Latah County Prosecuting Attorney –via Email: paservice@latahcountyid.gov
Elisa Massoth – via Email: legalassistant@kmrs.net
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