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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

**STIPULATED MOTION FOR SEALED
PROTECTIVE ORDER**

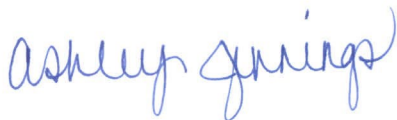
COMES NOW, Bryan C. Kohberger, by and through his attorneys of record, and with a
“No Objection” from the Latah County Prosecuting Attorney’s Office, and hereby stipulate to the
entry of a protective order as follows:

1. This Protective Order will govern the designation, disclosure and use of medical and mental health records of the Defendant and his family members disclosed to the State by the defense.
2. In this Protective Order, the term “Protected Information” means the medical and mental health records of the Defendant and his family members disclosed by the defense outlined in Exhibit A to their 1st Supplemental Response to Discovery filed with the Court on 1/9/25.
3. Access will be limited to direct review by the prosecuting attorneys assigned to this case and any further dissemination of the referenced Protected Information will be prohibited other than to the extent necessary for the prosecuting attorneys to prepare for court proceedings including hearings, trial and sentencing, further stipulation of the parties or order of the Court.
4. The referenced protected information will not be talked about, or any specifics given during court proceedings including hearings, trial and sentencing unless specifically agreed upon by the parties or permitted by the Court.
5. The prosecuting attorneys will not produce any of the Protected Information to any unauthorized person(s).
6. It will be the duty and responsibility of the assigned prosecuting attorneys to ensure that documents or things containing Protected Information subject to their control will at all times be kept in a safe and secure fashion to ensure that such information is not disclosed to or made accessible to persons other than those specifically authorized to review Protected Information under this Protective Order. The assigned prosecuting attorneys will be directly responsible to the court for fulfilling this responsibility.
7. The inadvertent or unintended disclosure, including those persons authorized to view the information, of Protected Information will not be deemed a waiver in whole or in

part of a subsequent claim of protection under this Protective Order, either as to the specific information disclosed or as to any other such information, provided that the inadvertent or unintended disclosure is promptly identified by the assigned prosecuting attorneys and notice of the claim of protection is given to the Defense.

8. Upon final termination of this action, whether by settlement, dismissal or other disposition, the provisions of the Protective Order will continue to be binding upon all persons or entities who are subject to the terms hereof, and the court will retain jurisdiction for enforcement of this order.
9. The defense and the prosecuting attorneys may request modification of this Protective Order upon a showing of good cause.
10. This Protective Order should be sealed to protect the privacy of the information.

RESPECTFULLY SUBMITTED this 9 day of January 2025.



ASHLEY JENNINGS
SENIOR DEPUTY PROSECUTOR



BY:

ANNE C. TAYLOR
ANNE TAYLOR LAW, PLLC