Electronically Filed 2/11/2025 4:42 PM Fourth Judicial District, Ada County Trent Tripple, Clerk of the Court By: Jennifer Keyes, Deputy Clerk

LATAH COUNTY PROSECUTOR'S OFFICE WILLIAM W. THOMPSON, JR., ISB No. 2613 PROSECUTING ATTORNEY ASHLEY S. JENNINGS, ISB No. 8491 SENIOR DEPUTY PROSECUTING ATTORNEY Latah County Courthouse 522 S. Adams Street, Ste. 211 Moscow, Idaho 83843-0568 (208) 883-2246 paservice@latahcountyid.gov

## 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 CHRISTOPHER KOHBERGER, Defendant.

Case No. CR01-24-31665

STATE'S RESPONSE TO DEFENDANT'S 22nd SUPPLEMENTAL REQUEST FOR DISCOVERY

TO: THE DEFENDANT BRYAN CHRISTOPHER KOHBERGER, and Counsel Anne Taylor:

COMES NOW the State of Idaho, by and through the Latah County Prosecuting Attorney, and submits Exhibit S-1 filed under seal in response to "Defendant's 22nd Supplemental Request for Discovery" filed on January 28, 2025.

The State incorporates the following responses as fully set forth at this point:

- "State's Response to Request for Discovery" filed on January 23, 2023.
- "State's Response to Defendant's First Supplement Request for Discovery" filed on February 21, 2023.

- "State's Response to Defendant's Second Supplemental Request for Discovery" filed on March 29, 2023.
- "State's Response to Defendant's Third Supplemental Request for Discovery" filed on May 12, 2023.
- "State's Response to Defendant's Motion to Compel Discovery" filed on May 12, 2023.
- "State's Supplemental Response to Defendant's 1<sup>st</sup>, 2<sup>nd</sup> and 3<sup>rd</sup> Supplemental Requests for Discovery" filed on June 8, 2023.
- "State's Response to Defendant's 4<sup>th</sup> Supplemental Request for Discovery" filed on June 16, 2023.
- "State's Supplemental Response to Defendant's 4<sup>th</sup> Supplemental Request for Discovery" filed on June 29, 2023.
- "State's Response to Defendant's Second Motion to Compel Discovery" filed on June 29, 2023.
- "State's Response to Defendant's Third Motion to Compel Discovery" filed on July 5, 2023.
- "State's Supplemental Response to Defendant's 2<sup>nd</sup> Supplemental Request for Discovery and Defendant's Motion to Compel Discovery" filed on July 12, 2023.
- "State's Supplemental Response to Defendant's Second Motion to Compel Discovery" filed on July 12, 2023.
- "State's Response to Defendant's 5<sup>th</sup> and 6<sup>th</sup> Supplemental Requests for Discovery" filed on July 25, 2023.
- "State's Supplemental Response to Defendant's Third Motion to Compel Discovery" filed on August 30, 2023.
- "State's Response to Defendant's 7<sup>th</sup> Supplemental Request for Discovery" filed on September 6, 2023.
- "State's Response to Defendant's 8<sup>th</sup> and 9<sup>th</sup> Supplemental Requests for Discovery" filed on October 24, 2023.

- "State's Response to Defendant's 10<sup>th</sup> Supplemental Request for Discovery" filed on November 20, 2023.
- "State's Response to Defendant's 11th Supplemental Request for Discovery" filed January 22, 2024.
- "State's Response to Defendant's 12th Supplemental Request for Discovery" filed March 25, 2024.
- "State's Response to Defendant's 13th Supplemental Request for Discovery" filed April 1, 2024.
- "State's Objection to Defendant's 15<sup>th</sup> Supplemental Request for Discovery" filed on April 4, 2024.
- "State's Response to Defendant's 14th Supplemental Request for Discovery" filed April 10, 2024.
- "State's Response to Defendant's Fourth Motion to Compel Discovery" filed April 23, 2024.
- "State's Supplemental Response to Defendant's Fourth and Response to Fifth Motions to Compel and Motion to Limit Scope of Testimony" filed May 10, 2024.
- "State's Supplemental Response to Defendant's Fifth Motion to Compel Discovery" filed May 10, 2024.
- "State's Second Supplemental Response to Defendant's Fourth Motion to Compel Discovery" filed May 10, 2024.
- "State's Second Supplemental Response to Defendant's Fifth Motion to Compel Discovery" filed on May 28, 2024.
- "State's Third Supplemental Response to Defendant's Fifth Motion to Compel Discovery" filed June 10, 2024.
- "State's Fourth Supplemental Response to Defendant's Fifth Motion to Compel and Motion to File Under Seal" filed on June 14, 2024.
- "State's Response to Defendant's 16<sup>th</sup> Supplemental Request for Discovery" filed on August 19, 2024.
- "State's Response and Supplemental Responses to Defendant's Requests for Discovery" filed on September 4, 2024.

- "State's Response to Defendant's 18<sup>th</sup> Supplemental Request for Discovery" filed on November 12, 2024.
- "State's Response to Defendant's 19<sup>th</sup> Supplemental Request for Discovery" filed on November 21, 2024.
- "State's Response to Defendant's Sixth Motion to Compel Discovery" filed on November 21, 2024.
- "State's Supplemental Response to Request for Discovery Regarding Expert Testimony" filed on December 18, 2024.
- "State's Response to Defendant's 20<sup>th</sup> Supplemental Request for Discovery" filed on December 20, 2024.
- "State's Response to Defendant's 21<sup>st</sup> Supplemental Request for Discovery" filed on December 31, 2024.
- "State's Objection to Defendant's Motion to Compel I.C.R. 16(b)(7) Material and for Sanctions" filed on December 31, 2024.

The State has and will continue to provide discovery in accordance with Idaho Criminal Rule 16 and applicable law and reserves any and all objections thereunder.

DATED this 11th day of February, 2025.

Ashley Jennings

Senior Deputy Prosecuting Attorney

## CERTIFICATE OF DELIVERY

I hereby certify that true and correct copies of the STATE'S RESPONSE TO DEFENDANT'S 22nd SUPPLEMENTAL REQUEST FOR DISCOVERY were served on the following in the manner indicated below:

Sacre Oterling

| Anne Taylor             | ☐ Mailed   |
|-------------------------|--|
| Attorney at Law         | <ul><li>☑ E-filed &amp; Served / E-mailed</li><li>☐ Faxed</li><li>☐ Hand Delivered</li></ul> |
| PO Box 2347             |  |
| Coeur D Alene, ID 83816 |  |
| info@annetaylorlaw.com  |  |

Dated this 11<sup>th</sup> day of February, 2025.