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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

DEFENDANT'S MOTION FOR LEAVE TO FILE ADDITIONAL EXPERT WITNESS DISCLOSURES

COMES NOW, Bryan C. Kohberger, by and through his attorneys of record, and hereby moves the Court for leave from the court's Sealed Order Governing Further Criminal Proceedings and Notice of Trial Setting filed 10/09/2024. Defense Counsel is asking for leave to file a 2<sup>nd</sup> Supplemental Response to Request for Discovery Regarding Expert Witnesses: Shutler and Howell. Mr. Kohberger requests leave to provide additional experts to meet new disclosures in the State's rebuttal expert disclosure in part and the State's lack of any real disclosure in part. These two additional experts are necessary to protect Mr. Kohberger's rights under the United States Constitution, Amendments, 5, 6 and 14 and the Idaho Constitution, Article I section 13. This motion is made in case the State is allowed to produce vague, late or undisclosed testimony.

Should the Court require a hearing on this matter, counsel requests 30 minutes to present oral argument, evidence and/or testimony in support thereof.

DATED this <u>3</u> day of March, 2025.

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 3 day of March, 2025 addressed to:

Latah County Prosecuting Attorney –via Email: <u>paservice@latahcountyid.gov</u> Elisa Massoth – via Email: <u>legalassistant@kmrs.net</u> Jay Logsdon – via Email: <u>Jay.Logsdon@spd.idaho.gov</u> Bicka Barlow, Attorney at Law – via Email: <u>bickabarlow@sbcglobal.net</u> Jeffery Nye, Deputy Attorney General – via Email: <u>Jeff.nye@ag.idaho.gov</u>

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