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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

**REPLY TO STATE'S RESPONSE TO
DEFENDANT'S MOTION IN LIMINE #2**

**RE: VAGUE AND UNDISCLOSED
EXPERT TESTIMONY**

COMES NOW, Bryan C. Kohberger, by and through his attorneys of record, and hereby replies to the State's Response to Motion in Limine 2 RE: Vague and Undisclosed Expert Testimony filed with the Court on March 17, 2025.

Latah County began prosecuting Mr. Kohberger in December of 2022. Discovery was filtered to Mr. Kohberger in a slow, disorganized and tedious fashion. The State had the benefit of 6 weeks, access to the scene, law enforcement and experts analyzing the scene, experts ready and available to assist with search warrants and expert advice. Hundreds of law enforcement officers assisted in the case. Access to the investigating with assisting law enforcement and experts meant that prosecutors did not have to filter through 68 terabytes of information to be sure the right information was at the fingertips of the expert.

The reality and gravity of 68 terabytes of information cannot be overstated. Mr. Kohberger's Capital Defense team has spent over two years devouring as much of the data as possible. The team has not completed review. His team does not have hundreds of people to locate and talk about various pieces of information contained in the discovery. The State does.

Mr. Kohberger is protected by the U. S. Constitution and the Constitution of Idaho. He has the right to a fair trial, to have effective assistance of counsel, to confront evidence against him. He has the right to NOT be convicted **unless** the State proves its case beyond a reasonable doubt. The State bears the burden of proof. The State has ethical duties, under the Constitution, criminal and evidentiary rules and Orders of this court, to disclose expert opinion and what it would rely on in its case against Mr. Kohberger. Instead, the State provided vague, loose topic area responses for the experts they had worked closely with. These same experts have been working with the State since the beginning of the case. The State's disclosures were, for the most part abysmal. Still, at it relates to 67 electronic devices and third party warrant returns, the State has not disclosed any expert opinions or disclosures of what it intends to rely on. The State's disclosures can only be described as sandbagging. In many cases, it appears that the State's initial disclosures resembled a laundry list of topics and then once Mr. Kohberger complied with the Court's order, the State took advantage of learning a great deal about Mr. Kohberger's experts and evidence, and tailored new disclosures to address Mr. Kohberger's experts. These are not "rebuttal" disclosures,

they are the State's case in chief. Numerous examples are laid out in detail in Exhibit 1. One example is the State's Amazon expert Cox, a second and more extreme example is FBI SA Ballance. Many of these expert disclosures are based on evidence and data that has still not been disclosed to Mr. Kohberger. This is particularly true of SA Ballance, whose ever changing reports and opinions are based on material that has not been provided to Mr. Kohberger.

To assist the Court, Mr. Kohberger appends Exhibit 1 to this motion as a guide to the chronology of the disclosures and the lack of detail. It identifies each expert and the limits of the disclosure. The State cannot be allowed to benefit from what they have done. Mr. Kohberger, recognizing what the State was doing, filed a motion to compel disclosures and a motion to extend his deadline. His motion to extend disclosure deadline was denied. During his motion to compel this court expressed intent to apply the rules if disclosures were not properly made. The State, then, with the advantage of Mr. Kohberger's expert disclosures, has continued to trickle new opinions to the defense.

The State cannot be allowed to benefit at the expense of Mr. Kohberger's right to a fair trial, confrontation, due process and assistance of counsel. The State cannot be allowed to ignore Mr. Kohberger's rights, shirk its duty and get a free pass on the rules. The State must be held to the limits of its timely disclosures.

DATED this 24 day of March, 2025.



BY:

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 24 day of March, 2025 addressed to:

Latah County Prosecuting Attorney –via Email: paservice@latahcountyid.gov

Elisa Massoth – via Email: legalassistant@kmrs.net

Jay Logsdon – via Email: Jay.Logsdon@spd.idaho.gov

Bicka Barlow, Attorney at Law – via Email: bickabarlow@sbcglobal.net

Jeffery Nye, Deputy Attorney General – via Email: Jeff.nye@ag.idaho.gov



Anderson

Initial Disclosure 12/18/24

This witness is an expert from NMS labs that performs testing for substances a deceased has consumed. His work encompassed EC, XK and KG. Reports are included. No other opinion has been provided.

Testimony should be limited to involvement and opinion within the report which is no more than quantity of drugs found in blood.

Ayers

This witness works at Idaho State Police Forensics Lab. She was on scene at 1122 King on November 17, 2022. She has continued to work at ISP forensics since. She has been accessible to the State beginning 4 days after the incident and forward.

Initial disclosure 12/18/24 –

Topic areas: Ayers can be expected to testify as to the search and collection of evidence, such as presumptive blood testing, the collection of buccal swabs, swabbing for potential DNA evidence, collection of hair samples, and/or latent prints. Ayers may also discuss the process of photographing crime scenes. Additionally, Ayers may discuss lab protocols and procedures including the disposition of evidence.

Lab Report 25 was disclosed as her expert opinion.

Rebuttal disclosure 2/17/25

She actively participated in using the LizQ imaging system,

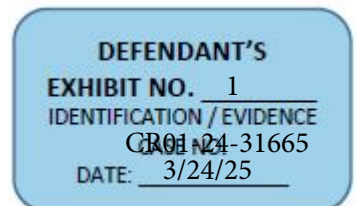
“marking blood stains, reviewing evidence, discussing which evidence may or may not be relevant to the crime, liaising with detectives on the case, and working with other entities to support the needs of the investigation.”

Much of this disclosure describes what can be done and what a “crime scene team” does. These descriptions of what was done are included, but the disclosure does not clearly state what she did or what her opinion is.

Additional disclosure 3/3/25

This disclosure starts with general scene processing before another topic area is disclosed.

“Ayers will testify about DNA. Deoxyribonucleic acid (DNA) is genetic material contained in human cells that may be utilized for human identification. DNA may be present on an item in the form of biological materials such as blood, semen, and saliva or may be left on an item when it is handled (touch DNA). Biological evidence and possible/potential DNA evidence is collected for preservation and may be sent



for further testing by qualified DNA analysts. Crime Scene personnel do not test or screen for DNA specifically.”

The disclosure continues describing processing and testing. The State does not disclose any opinions she may have about what was done or why. The State does not provide any opinions related to her knowledge of DNA in this case or “touch” DNA.

The State has not made any expert disclosure other than lab report 25. The court must limit Ayers testimony to her qualifying background and her work and opinion as stated in report 25. Attached as (Experts 1)

Ballance

SA Ballance is an FBI agent, specializing in cell site location information and a member of the Cellular Analysis and Survey Team (CAST). He worked alongside Moscow Police Detectives. He was co-located in Moscow. He assisted in search warrant applications and was communicating with the State and detectives at least as early as November 15, 2022. He assisted the State in securing digit information, analyzing information as well as conducting interviews as part of the investigation.

Expert Disclosure 12/18/24

The initial disclosure stated he would testify about how cell towers work and interact with cell phones. His testimony would include what records, related to personal cell phones are available and how they are used.

“SA Ballance will testify consistent with the historical cellular phone data provided to Defendant in discovery. SA Ballance will explain the methodology used to create his report, which is attached hereto as Exhibit S-2(b). SA Ballance will discuss how call detail records provided by AT&T were used to create cell site maps contained in his report, including his corroboration of the mapping with the records provided. SA Ballance will also explain in detail what the mapping in his report reflects”.

It is noteworthy that the State has NEVER disclosed SA Balance’s methodology used to create his report. He has never disclosed how his maps were created. SA Balance has omitted over 90% of the AT&T data during the relevant times he chose to map. There is no disclosure as to why this data was omitted.

“SA Ballance will provide his opinion as to the general locations in which the target cellular telephones were located at various times before and after the homicides at 1122 King Road and the cellular phones' direction of travel. That testimony will rely on information furnished by cellular phone providers concerning which cell towers the cellular telephones connected with during those times. SA Ballance may also testify regarding which cellular tower sectors were utilized for the relevant data and explain that the direction of the cellular tower sector utilized can indicate the general location of the cell phone relative to the tower utilized.”

The State has NEVER produced an actual opinion by SA Balance about “the general location ... (Mr. Kohberger’s) ...cellular telephone was at various times before and after the homicides at 1122 King Road and the cellular phone[’s] direction of travel.

2/17/25 Rebuttal Disclosure

The State responds to Defense disclosures but in doing so it continues to refuse to provide expert analysis and opinion.

“The FBI Cellular Analysis Survey Team (CAST) conducts drive testing using a Gladiator Autonomous Receiver (GAR) developed by Gladiator Forensics. The GAR collects the data, which is then analyzed by Gladiator Forensics software. The software creates the coverage maps seen on several pages of the report. The coverage maps are created using the actual measurements taken by the GAR and interpolation using the natural neighbor algorithm.”

The disclosure does not state who produced the maps or how they were analyzed. The disclosure lacks an opinion about the mapping program or its production. The State has not disclosed records that verify the mapping program, nor has it stated Balance is an expert in mapping. SA Ballance went to great lengths to obtain raw drive test data in this case. Despite those efforts he has only produced the mapping of that data for less than 5% of the relevant cell sites in his work product. There have been no disclosures as to why he has omitted 95% of the relevant coverage maps.

The disclosure goes on, “FBI CAST examines each transaction in the raw records to determine reliability, based on several factors. As an example, when an AT&T data session is initiated on AT&T’s network that is not following a timeout of a previous data session, AT&T records the first cell site and then the subsequent cell sites associated with the session if applicable.”

The State does not disclose SA Ballance’s review of reliability. The State is creating wiggle room for Balance to testify to something undisclosed at this time. This particular area impacts seven minutes of time and exculpatory information. This is the seven minutes between 2:47 and 2:54 am. The State applied for search warrants and its arrest warrant claiming Mr. Kohberger’s phone stopped reporting to the network at 2:47 am. The State later had to concede, based on its own discovery disclosures, that the phone went off the network at 2:54 am. Between the time of 2:47 and 2:54 am, while the phone was on and receiving service it was utilizing cell towers. The phone was not stationary and utilizing only one tower. The phone was moving during the seven minutes. During the seven minutes the towers hand-off service as the phone is moving. These handoffs, once analyzed, locate the direction of movement and the location of the phone when it stops reporting at 2:54 am. The State asserts SA Ballance mapped this data but has not produced it.

The State must be required to disclose what it is not saying here. The State must not be allowed to ambush Mr. Kohberger at trial by stating something that is not grounded in record.

The State goes on to say handoff data is analyzed on page 13 of the CAST PowerPoint. There is no analysis. SA Ballance has not mapped a single handoff in the work product produced. These ignored handoffs are the handoffs occurring during the described 7 minutes – analyzing those depict exculpatory evidence. It is important to understand handoff data makes up more than 85% of the defendant’s AT&T network connections. SA Ballance’s opinion as to why he can omit those connections in one part of his report while relying on them in others must be clearly stated.

The State does not provide basis or analysis for SA Ballance's claim that Mr. Kohberger was using a tower that services the King Road address. Instead, they say this:

“Generating a report of all of the defendant's movements from June 2022 to December 2022 would be overly broad, unnecessary, and prolong the jury's service with details not relevant to prosecution.”

With the help of this very expert the State sought and received AT&T phone records for Mr. Kohberger from June 2022 through December 2022. In affidavits supporting search and arrest the State averred that Mr. Kohberger's phone data depicted numerous occasions where it utilized a tower servicing the King Road address. The State supplied SA Ballance as an expert and disclosed his PowerPoint with slides 29 & 30, claiming this same thing. It is noteworthy that the dates of this alleged behavior have been changed over the course of this expert's work. What the State has failed to do is provide the analysis of the claim. Mr. Kohberger will face his Capital Jury without the State backing up this claim. The State does not have connection between Mr. Kohberger and anyone that was at 1122 King Road. The State puts this information out to attempt to establish a connection. While the State has chosen not to disclose the analysis Mr. Kohberger has disclosed the analysis. The analysis shows the falsity of the State's experts slide. The real analysis is exculpatory to Mr. Kohberger. This must be excluded from the States presentation.

The State provides its reason the CAST draft and CAST final PowerPoints are different in size.

“...CAST utilizes a peer review process of any work product prior to it being presented at trial. This peer review process is meant to ensure the final report is accurate, provides clarity to raw cellular records, and relevance to the State's case presentation.”

The State has failed to provide ANY documentation of its peer review process and opinions as to why changes were made.

This disclosure addresses AT&T Timing advance records. Mr. Kohberger respectfully requests the Court look to the pleading and affidavit he filed in response to the States Motion on that topic.

Supplemental Disclosure 3/3/25

This disclosure advises the court and counsel that SA Ballance plans to testify by summary from various AT&T documents and utilize his own created summary as exhibits in place of the actual record. The State has not supplied such documents, unless it is the PowerPoint. If that is the case these documents **are data that are the** result of an undisclosed analysis and interpretation of the data.

This disclosure advises SA Balance will testify as follows:

“Page 13 depicts cellular phone usage by the 8458 phone on November 13, 2022, and Ballance is expected to testify that when the 8458 phone interacted with the AT&T network at 2:47:29 a.m., the phone was not at the Bryan Kohberger residence, marked “BK” on the map, rather it was southeast of the Bryan Kohberger residence as depicted by the drive test data. Ballance is also expected to testify that he analyzed additional handoff data that occurred during this data session and that the 8458 phone stopped communicating with the network at 2:54:45.”

The State has NOT disclosed an analysis or WHERE SA Ballance will claim the phone was located. These are the 7 critical minutes that contain exculpatory evidence.

“Page 28 shows a map that includes 1122 King Road, Moscow, Idaho, represented by the “CS” icon and a yellow circle that represents a 100 meter radius around the Crime Scene. Ballance will explain that he conducted analysis of all the cell sites in the area that provided coverage to the Crime Scene and identified any cell sites that drive test data showed coverage that included this 100 meter radius around the Crime Scene.”

The State has NOT disclosed this analysis.

“Pages 29 and 30 represent any time that the 8458 Phone utilized a cell site identified as part of Page 28, between the hours of 10:00 p.m. and 4:00 a.m. (23 separate instances between July 9, 2022, to November 7, 2022). Ballance will testify that the 8458 Phone used cell sites consistent with being at the crime scene during these dates and times. Ballance will further testify that the hours between 10:00 p.m. and 4:00 a.m. were identified by the investigative team as times of interest.”

The State has NOT disclosed its analysis. In its 2/17/25 disclosure it was these times the State claimed was cumbersome and a waste of time to analyze.

Mr. Kohberger provides Exhibit 2, affidavit of Sy Ray, to support his motion to exclude SA Ballance’s testimony. This witness must be excluded.

Barnhart, Heather AND Jared

Initial Disclosure 12/18/24

The disclosures leave out any analysis and any real opinion about “user behavior and actions on a PC and opinions of gaps”.

Rebuttal Disclosure 2/17/25

This disclosure advised Mr. Kohberger his experts needed to do a better disclosure so the State could rebut his expert.

Testimony at trial must be limited to what these experts examined the processes used and identify things found as contained in the disclosure. The experts have not provided an opinion about user behavior, only that gaps are abnormal. No further opinion has been provided for Mr. Kohberger.

Cox

Initial Disclosure 12/18/24

This disclosure is a list of topics .

Supplemental Disclosure 3/3/25

This disclosure discloses specific areas of testimony.

This discovery comes almost 3 months after the disclosure date and is still lacking critical information. See David Howell Affidavit in Motion in Limine # 9 Amazon Click Activity.

Testimony must be excluded because no real expert opinion has been stated and testimony is based on incomplete information.

Dace/White

Initial Disclosure 12/18/24

This disclosure listed topic areas of STR and YSTR DNA testing and one specific area of the Pennsylvania trash pull and contained in Lab report 6. The disclosure contained loose language about additional information or other analyst's findings.

Rebuttal Disclosure 2/17/25

This disclosure increases her testimony about CODIS and why profiles were or were not uploaded. The decision and reason not to utilize CODIS for the two unknown male profiles has now been disclosed for the first time in over two years. Despite requests in discovery and the topic arising, this is the first time any reason has been disclosed. The State has taken the advantage of knowing Mr. Kohberger's timely disclosed work and decided upon a course of action to counter it. This portion of the disclosure must not be allowed.

Supplemental Disclosure 3/3/25

This disclosure references DNA testing with more information than the initial disclosure, Report 6 as disclosed before and reference to Report 16. Both reports contain her work. Lab Report 16 was referenced in the initial disclosure.

Testimony must be limited to describing DNA testing and Lab Report 16.

Dawson

Rebuttal Disclosure 2/17/25

This expert was disclosed for the first time in Rebuttal disclosures. His area of expertise and proposed testimony, that MM was severely impaired by her intoxication and could not fight back, is not one that was challenged by expert in Mr. Kohberger's disclosures. The timing of this disclosure does not leave Mr. Kohberger the opportunity to consider the necessity of meeting this expert analysis. This testimony serves no legitimate purpose other than to inflame the passions of the jury. Mr. Kohberger has not in any way contested toxicology on MM. This is an improper Rebuttal and must be excluded.

Deisher

Initial Disclosure 12/18/24

This expert works for NMS laboratory. The expert analyzed toxicology for MM. The report was disclosed.

Testimony must be limited to the contents of the NMS laboratory toxicology report.

Douglass

Initial Disclosure 12/18/24

SA Douglass works for the FBI and is a Forensic Accountant. This disclosure stated the Douglass was intended to testify as a lay witness and about the various records collected and data contained therein. The State included the caveat that any expert testimony would be based on his training and experience contained in his CV. Two FBI reports relating to the records he looked at and identifying specific transactions was included. These reports did not contain opinion about the records listed.

Supplemental Disclosure 3/3/25

This disclosure references numerous documents not listed in the previous disclosure. These appear to be documents he utilized the Federal Grand Jury Subpoena Process to obtain. His anticipated testimony includes Amazon records. His accounting background is not the same as digital forensics. Amazon platform is explained in Defense Motion #11, Amazon Click and the Affidavit of David Howell, other than collecting the record the State has not disclosed Douglass' credentials to analyze Amazon records. No opinion about the records was disclosed.

The State disclosed that Douglass will testify about spending habits. Other than documenting financial institutions and transaction records the State has not disclosed this expert's opinion of spending habit.

This expert must be limited to the specific bank records or purchases contained in the disclosure. Opinion or what it is based on must be excluded because any opinion of this expert has not been disclosed.

Gilbertson

Rebuttal Disclosure 2/17/25

This witness works for Idaho State Police. He worked as an investigator on this case. This disclosure does not properly rebut Mr. Kohberger's disclosures. Further, the State has not identified how this witness is an expert in what he claims to be an expert in. Expert testimony and any opinion must be excluded.

Hille

Rebuttal Disclosure 2/17/25

This witness is disclosed as a Rebuttal witness. The disclosure lists specific clips of vehicles that he will testify about. However, the disclosure goes further to state there are other videos but does not indicate this witness has an opinion about the vehicles. His testimony must be limited to what has been disclosed.

Imel

Initial Disclosure 12/18/24 and Rebuttal Disclosure 2/17/25

This witness is a Special Agent in the FBI. His role was to look at video footage supplied to him and attempt make and model identification of a vehicle captured on footage on King Road. He was supplied various additional clips to make identification. Both disclosures contain opinion and rebuttal to Mr. Kohberger's expert opinion. As long as the testimony does not change from that contained in the disclosures, or go beyond the disclosures Mr. Kohberger is advised.

Mabutt**Initial Disclosure 12/18/24**

This witness is the Coroner for Latah County. This disclosure contained opinion and reference to previously sworn testimony. As long as the testimony does not change Mr. Kohberger is advised.

Maichak**Initial Disclosure 12/18/24**

This witness works for Idaho State Police Forensic Laboratory. This disclosure contains notice that this witness will talk about the process of DNA work and specifically her work in lab reports 1, 4, 17 and 20. The State used loose language about her testimony not being further limited.

Supplemental Disclosure 3/3/25

This disclosure includes her DNA work and process but adds generally about probabilistic genotyping, and what kinds of items contain DNA. This disclosure includes reference to CODIS and parentage index. No further opinion, other than what is contained in her reports are disclosed.

Her testimony must be limited to general topics as stated and her work in the above mentioned lab reports.

Martinez**Initial Disclosure 12/18/24**

This witness works for Idaho State Police Forensics Laboratory. The disclosure includes general topics such as evidence collection, documentation. Photography, evidence disposition and lab protocol – in general terms.

This witness; expert opinions relating to this case, are contained in lab reports 5, 10, 11, 19, 23, 24, 25, 27, 30, 32, 37, 38, 39, 40, and 41.

Supplemental Disclosure 3/3/25

This disclosure includes references to this witness collecting biological data from Mr. Kohberger. It also includes a general description of taking and comparing fingerprints as well as available databases for upload. Reference is made to some of the initially disclosed report numbers. There is no further disclosure about the opinions contained in the reports.

As long as this witness testifies within the scope of general topics as listed and the specific reports for expert opinions Mr. Kohberger is advised.

Miller**Initial Disclosure 12/18/24**

This witness works for Idaho State Police Forensics Laboratory. This disclosure referenced specific lab reports, 7, 13, 31, 34, 36 and grand jury testimony.

Supplemental Disclosure 3/3/25

This disclosure add reference to various topic without conclusions – such as probabilistic genotyping; human biological material utilized in DNA testing, how to determine how much DNA is present. This disclosure discusses CODIS and the decision not to put males B or D into the database.

The decision and reason not to utilize CODIS for the two unknown male profiles has now been disclosed for the first time in over two years. Despite requests in discovery and the topic arising, this is the first time any reason has been disclosed. The State has taken the advantage of knowing Mr. Kohberger’s timely disclosed work and decided upon a course of action to counter it. This portion of the disclosure must not be allowed.

Mowery

Initial Disclosure 12/18/24

This witness is a Detective with Moscow Police Department. He began working the case in various capacities since the first day. He has conducted interviews, assisted in obtaining search warrants, worked on digital data and worked extensively with SA Balance. This disclosure was a list of 56 devices and other third party data.

Supplemental Disclosure 3/3/25

This disclosure states that there are 49 devices and digital data sets that this witness will testify there is no connection between Mr. Kohberger and any of the following individuals: MM, KG, XK, EC, DM, BF, JD, JS, MM (door dash) EG, or EA. The rest of this witness’ testimony will be about the download of other devices.

Other than police work conducted by this witness the testimony must be limited to what has been disclosed. The devices and third party data contain many terabytes of discovery. No specific testimony regarding any of devices should be allowed.

Nord

Initial Disclosure 12/18/24

This witness works for Idaho State Police Crime Laboratory. This disclosure refers to Lab report 18.

Supplemental Disclosure 3/3/25

This disclosure refers to the item #71 – which was the item tested in Report 18. This disclosure describes the processes and methods used in testing.

As long as testimony is limited to these disclosures Mr. Kohberger is advised.

Nowlin

This objection is contained in MIL#6 and is incorporated her by reference but will be argued separately.

Seat

Initial Disclosure 12/18/24

This witness works for Idaho State Police Crime Laboratory. This disclosure referred to Lab report 3 and listed topics to discuss

Supplemental Disclosure 3/3/25

This disclosure does not list additional lab reports but contains more detail about the process of DNA work.

As long as this witness does not testify outside of these disclosures Mr. Kohberger is advised.

Singh

Initial Disclosure 12/18/24

This witness is the pathologist that conducted the autopsies in this case. This disclosure contains both opinion and the autopsy report.

Rebuttal Disclosure 2/17/25

This disclosure contains opinion related to some of Defense expert disclosures.

As long as this witness does not testify outside of these disclosure Mr. Kohberger is advised. (Mr. Kohberger has received a separate disclosure related to Part 2 should the trial reach that stage.)

Sutton

Initial Disclosure 12/18/25

This witness works as an expert in blood spatter. This disclosure contained an expert report.

Rebuttal Disclosure 2/17/25

This disclosure noted a promised report.

Supplemental Disclosure 3/3/25

This disclosure was the report promised on 2/17/25 and has the date of 2/13/25. Mr. Kohberger did not receive it until 3/3/25. His concern is if his experts need to respond. Mr. Kohberger needs additional time to make the final determination. The changes to the initial report by Sutton are extensive.

Tanzola

Initial Disclosure 12/18/24

This witness is a Special Agent with the FBI. This disclosure noted the expert was an expert in digital forensics. The expert examined 7 items and a report describing the process was included. The disclosure contained no opinion from processing the items.

Rebuttal Disclosure 2/17/24

This disclosure advised Mr. Kohberger his experts needed to do a better disclosure so the State could rebut his expert.

Testimony at trial must be limited to what this expert examined, and the process used. No opinion has been provided for Mr. Kohberger.

Uhrig

Initial Disclosure 12/18/24

This witness was an examiner with Post Falls Police Department. The disclosure contained reference to 7 devices and a police report. The disclosure referenced a police report. The report identified the examination and disclosed no connection to Mr. Kohberger.

Supplemental Disclosure 3/14/25

This disclosure stated that the witness will testify about his expertise to examine these devices. Additionally, it clarified that no connection with Mr. Kohberger was found. No further opinion has been provided.

Testimony at trial must be limited to the contents of these two disclosures.

Walthall

Initial Disclosure 12/18/24

This witness works for Idaho State Police Forensics. This disclosure stated the witness will testify about the latent print processing. Further, opinion was contained in the Grand Jury testimony and lab reports 2 and 15.

Supplemental Disclosure 3/3/25

This disclosure references the same lab reports but contains greater detail about print examination, processing and uploading for database comparison. No further opinions have been provided.

As long as the testimony relates to what has been disclosed Mr. Kohberger is advised.

Wilt

Initial Disclosure 12/18/24

This disclosure disclosed prior testimony in Grand Jury, Lab reports 1, 3, 8, 9, 14, 22, 28, 29, 33, 35.

Supplemental Disclosure 3/3/35

This disclosure contained further description of testimony relating to DNA collection, and what Trace DNA means. No further opinions have been provided

As long as testimony relates to these disclosures Mr. Kohberger is advised.

Youngling

Initial Disclosure 12/18/24

This witness is/was employed by Idaho State Police Forensics. The disclosures lists her testimony as discussing DNA testing in general and reference to lab reports 2, 4, 12 and 21.

Amended Disclosure 3/3/25

This disclosure describes various lab processes such as scene processing, fingerprinting, packaging items taken for evidence, DNA testing, Trace evidence and Tire Impressions. The disclosure is general and not specific to this case. No opinion, as it relates to Mr. Kohberger is provided.

Testimony must be limited to the stated lab reports and general procedures in the lab.