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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

**2nd NOTICE OF FILING DEFENDANT'S
PROPOSED JURY INSTRUCTIONS
UNDER SEAL**

COMES NOW, Bryan C. Kohberger, by and through his attorneys of record, and hereby submits to the Court two additional proposed jury instructions.

DATED this 14 day of May, 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 14 day of May, 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



PUBLIC SENTIMENT

DEFENDANT'S REQUESTED INSTRUCTION NO. _____

In reaching your final sentencing verdicts, you must treat the defendant as a uniquely individual human being. Further, you must not be influenced by prejudice or bias of any sort against the defendant or the prosecution, and you must not consider any public opinion or community sentiment for or against the defendant or the prosecution. Your decisions may not be the result of any irrational or arbitrary emotional response. Rather, each of your final sentencing verdicts reflect your individual reasoned moral determination.

GIVEN _____

REFUSED _____

ACCEPTED _____

MODIFIED _____

COVERED _____

HONORABLE STEVEN J. HIPPLER

NOT EXPLAINING BUT RESPECT

DEFENDANT'S REQUESTED INSTRUCTION NO. _____

There is no requirement that you explain or justify to your fellow jurors why your individual reasoned moral judgment leads you to a particular decision on a count. Nevertheless, it is your duty as jurors to consult with one another and to deliberate on all the counts.

While you are not required to agree with the determinations, opinions, feelings, or thoughts of other jurors, you must deliberate with your fellow jurors. After deliberating, if a juror disagrees with the rest of the jurors, that disagreement must be respected by the other jurors and will be respected by the Court. Ultimately, each of you must deliberate and decide for yourself the appropriate sentence based on your individual and reasoned moral judgment.

GIVEN _____

REFUSED _____

ACCEPTED _____

MODIFIED _____

COVERED _____

HONORABLE STEVEN J. HIPPLER