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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 No. CR01-24-31665

PARTIES PROPOSED
STIPULATED JURY
INSTRUCTION

COME NOW the State of Idaho, by and through the Latah County Prosecuting Attorney, and the above-named defendant, by and through his undersigned attorney of record, and hereby stipulate to the attached proposed jury instruction consistent with the Court's directive contained in its April 17, 2025, "Order on Defendant's Motion in Limine RE: Rylene Nowlin and 'touch' and 'contact' DNA."

Dated 5/30/25



William W. Thompson, Jr.
Prosecuting Attorney



Anne Taylor
Defense Counsel

PARTIES REQUESTED
INSTRUCTION NO. _____

During testimony you may have heard certain witnesses refer to “touch DNA,” or “contact DNA,” or “trace DNA.” To the extent that those terms may have been mentioned by a witness, you are to disregard that particular term and not give it significance as you consider the evidence or testimony related to the use of the term.

ICJI 308 EVIDENCE LIMITED AS TO PURPOSE (modified)

GIVEN _____
REFUSED _____
MODIFIED _____
COVERED _____
OTHER _____