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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 RESPONSE TO THE COURT'S ORDER REGARDING SEALED DOCUMENTS**

COMES NOW, Bryan C. Kohberger, by and through his attorneys of record, and hereby submits his response to the Court's Order Regarding Sealed Documents dated August 4, 2025. The Defense's objection/no objections are listed under each item below.

1. 7/24/25: State's Exhibits Sl-5-7/23/2025 Sentencing Hearing, which include photographs of each of the deceased victims and a photograph of the six victims together (five (5) exhibits)

   The Defense has no Objection to unsealing.

2. 7/23/25: Orders Modifying/ Amending No Contact Order (seven (7) orders)

   The Defense has no objection to unsealing with redactions of anticipated witness names, address and personal identifying information based on ICAR 32(i)(3)(A)(1,3 and 5).

3. 7/15/25: Opposition to Motion to Vacate Nondissemination Order

   The Defense has no Objection to unsealing.

4. 7/9/25: SEALED Exhibit S-1 to State's Response to Defendant's 24th Supplemental Request for Discovery

   The Defense has no objection to unsealing with anticipated witness names being redacted based on ICAR 32(i)(3)(A)(1,3 and 5) –there is continued media attention – including social media and online sleuths and public harassment reasons. Online media reflects continued attention and comments that may be offensive and harassing and impact safety and livelihood of persons named.

5. 7/3/25: Sheriffs Return concerning witness K.S.F.

   The Defense has no objection to unsealing with redactionwith redactions of anticipated witness names, address and all personal identifying information based on ICAR 32(i)(3)(A)(1,3 and 5).

6. 7/2/25: Guilty Plea Advisory form completed by Defendant

   The Defense has no Objection to unsealing.

7. 6/27/25: 2nd Notice of Filing Defendant's Additions *I* Objections to the Juror Questionnaire

   The Defense Objects based on the language of ICAR 32(g)(8). All renditions of the Juror Questionnaire were sealed and not for circulation. Portions of the Questionnaire contain sensitive information relating to mental health and other portions contain potential witness information. The Defense submits that ICAR 32(i)(3)(A) (1,3 and 5) apply to people having names revealed. There is continued public and media scrutiny relating to this case and keeping names protected will prevent harm, harassment and sensitive information from becoming media fodder.

   Even though this pleading does not contain that information the Defense suggests that all parts of the Questionnaire be treated the same.

8. 6/27/25: Sheriffs return concerning witness T.A.D.

   The Defense has no objection to unsealing with redaction of anticipated witness names, address and all personal identifying information based on ICAR 32(i)(3)(A)(1,3 and 5).

   The Defense has no objection to unsealing with redactions of anticipated witness names, address and personal identifying information based on ICAR 32(i)(3)(A)(1,3 and 5).

9. 6/26/25: SEALED Order on Defendant's Offer of Proof RE: Alternate Perpetrators (unredacted)

   The Defense Objects based on ICAR 32(i)(3)(A)(1,3 and 5) –there is continued media attention – including social media and online sleuths and public harassment reasons. Online media reflects continued attention and comments that may be offensive and harassing and impact safety and livelihood of persons named. The public copy contains all pertinent information but withholds the names and is appropriate.

10. 6/25/25: SEALED Exhibit W to Defendant's 24th Supplemental Request for Discovery

    The Defense has no objection to unsealing with anticipated witness names being redacted based on ICAR 32(i)(3)(A)(1,3 and 5) –there is continued media attention – including social media and online sleuths and public harassment reasons. Online media reflects continued attention and comments that may be offensive and harassing and impact safety and livelihood of persons named.

11. 6/25/25: State's Amended Notice of Compliance and Motion to Seal States Amended Witness List

    The Defense Objects to lay witness names being released based on ICAR 32(i)(3)(A)(1,3 and 5) –there is continued media attention – including social media and online sleuths and public harassment reasons. Online media reflects continued attention and comments that may be offensive and harassing and impact safety and livelihood of persons named.

12. 6/18/25: Court Minutes for Closed Session re Motion concerning Alternate perpetrators

    The Defense has no objection to unsealing the Court Minutes.

13. 6/16/25: State's Motion to Seal Ex Parte Filings RE: Out of State Witnesses

    The Defense has no objection to unsealing.

14. 6/16/25: Exhibit S-l(b) to State's Supplemental Response to Request for Discovery RE: Expert Testimony

    The Defense has no objection to unsealing.

15. 6/16/25: Exhibit S-l(a) to State's Supplemental Response to Request for Discovery RE: Expert Testimony

    The Defense has no objection to unsealing.

16. 6/16/25: Exhibit S-1 to State's Supplemental Response to Request for Discovery RE: Expert Testimony

    The Defense has no objection to unsealing.

17. 6/13/25: Sheriffs Return concerning witness Y.R.

    The Defense has no objection to unsealing with redaction of anticipated witness names, address and all personal identifying information based on ICAR 32(i)(3)(A)(1,3 and 5).

    The Defense has no objection to unsealing with redactions of anticipated witness names, address and personal identifying information based on ICAR 32(i)(3)(A)(1,3 and 5).

18. 6/13/25: Defendant's Reply in Support of Motion for Access

    The Defense has no objection to unsealing.

19. 6/13/25: Defendant's Reply to State's Objection to Defendant's Offer of Proof RE: Alternate Perpetrators and Defendant's Evidence in Support of Offer of Proof RE: Alternate Perpetrator

    The Defense requests redaction of anticipated witness names based on ICAR 32(i)(3)(A)(1,3 and 5) –there is continued media attention – including social media and online sleuths and public harassment reasons. Online media reflects continued attention and comments that may be offensive and harassing and impact safety and livelihood of persons named.

20. 6/12/25: State's Motion to Amend Witness List and Supplement Expert Disclosure

    The Defense position is that redaction of anticipated witness name is appropriate based on ICAR 32(i)(3)(A)(1,3 and 5) –there is continued media attention – including social media and online sleuths and public harassment reasons. Online media reflects continued attention and comments that may be offensive and harassing and impact safety and livelihood of persons named.

21. 6/12/25: Notice of Filing - SEALED Defendant's Amended Exhibit Chart

The Defense has no objection to unsealing.

22. 6/12/25: Order Sealing State's Response to Defendant's Motion RE: Special Investigation

    The Defense has no objection to unsealing.

23. 6/12/25: Order Sealing Defendant's Motion for Access and Objection to Court's Order

    The Defense has no objection to unsealing.

24. 6/11/25: Motion to Seal State's Response to Defendant's Motion RE: Special Investigation

    The Defense has no objection to unsealing.

25. 6/11/25: State's Response to Defendant's Motion RE: Special Investigation

    The Defense has no objection to unsealing

26. 6/11/25: Defendant's Objection to Release of Privileged and Confidential Work Product

    The Defense has no objection to unsealing.

27. 6/11/25: Defendant's Motion for Access & Fair Investigation

    The Defense has no objection to unsealing.

28. 6/11/25: Motion to Seal Defendant's Motion for Access and Objection to Court's Order

    The Defense has no objection to unsealing.

29. 6/9/25: Witness List - Defendant's 2nd Amended Phase Two Mitigation Witness List

    The Defense Objects based on ICAR 32(i)(3)(A)(1,3 and 5) –there is continued media attention – including social media and online sleuths and public harassment reasons. Online media reflects continued attention and comments that may be offensive and harassing and impact safety and livelihood of persons named.

30. 6/9/25: Order Staying Order

    The Defense has no objection to unsealing.

31. 6/9/25: Order Sealing Defendant's Motion and Order for Emergency Order

    The Defense has no objection to unsealing.

32. 6/9/25: Order Conditionally Denying Admission of Additional Exhibits as Evidence at Trial

    The Defense has no objection to unsealing.

33. 6/9/25: Order Granting Defense Expert Analysis of Evidence

    The Defense Objects to unredacted release, and requests redaction of the expert's name and address. The request is based on ICAR 32(i)(3)(A)(1,3 and 5) –there is continued media attention – including social media and online sleuths and public harassment reasons. Online media reflects continued attention and comments that may be offensive and harassing and impact safety and livelihood of persons named.

34. 6/6/25: State's Response RE: Defendant's Motion for Independent Analysis of Evidence

    The Defense Objects to unredacted release, and requests redaction of the expert's name and address. The request is based on ICAR 32(i)(3)(A)(1,3 and 5) –there is continued media attention – including social media and online sleuths and public harassment reasons. Online media reflects continued attention and comments that may be offensive and harassing and impact safety and livelihood of persons named.

35. 6/6/25: Motion for Emergency Order

    The Defense has no objection to unsealing.

36. 6/6/25: Motion to Seal Defendant's Motion and Order for Emergency Order

    The Defense has no objection to unsealing.

37. 6/6/25: Stipulated Motion to the Admission of Additional Exhibits as Evidence at Trial

    The Defense has no objection to unsealing.

38. 6/6/25: Motion for Independent Analysis of Evidence

    The Defense Objects to unredacted release, and requests redaction of the expert's name and address. The request is based on ICAR 32(i)(3)(A)(1,3 and 5) –there is continued media attention – including social media and online sleuths and public harassment reasons. Online media reflects continued attention and comments that may be offensive and harassing and impact safety and livelihood of persons named.

39. 6/6/25: State's Objection to "Defendant's Offer of Proof RE: Alternate Perpetrators" and "Defendant's Evidence in Support of Officer of Proof RE: Alternate Perpetrator"

    The Defense requests redaction of anticipated witness names based on ICAR 32(i)(3)(A)(1,3 and 5) –there is continued media attention – including social media and online sleuths and public harassment reasons. Online media reflects continued attention and comments that may be offensive and harassing and impact safety and livelihood of persons named.

40. 6/5/25: Order Granting Access to Sealed Record

    The Defense has no objection to unsealing.

41. 6/4/25: Exhibit S-1 to State's Supplemental Response to Defendants Request for Discovery

    The Defense has no objection to unsealing with anticipated witness names being redacted based on ICAR 32(i)(3)(A)(1,3 and 5) –there is continued media attention – including social media and online sleuths and public harassment reasons. Online media reflects continued attention and comments that may be offensive and harassing and impact safety and livelihood of persons named.

42. 6/3/25: Exhibit S-1 to State's Response to Defendant's 23rd Supplemental Request for Discovery

    The Defense has no objection to unsealing with anticipated witness names being redacted based on ICAR 32(i)(3)(A)(1,3 and 5) –there is continued media attention – including social media and online sleuths and public harassment reasons. Online media reflects continued attention and comments that may be offensive and harassing and impact safety and livelihood of persons named.

43. 6/2/25: Exhibit V to Defendant's 23rd Supplemental Request for Discovery.

    The Defense has no objection to unsealing based on ICAR 32(i)(3)(A)(1,3 and 5) – there is continued media attention – including social media and online sleuths and public harassment reasons. Online media reflects continued attention and comments that may be offensive and harassing and impact safety and livelihood of persons named.

DATED this ___18____ day of August, 2025.

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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 ___18____ day of August, 2025 addressed to:

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