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**IN THE DISTRICT COURT OF THE SECOND JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF LATAH**

STATE OF IDAHO

Plaintiff,

V.

BRYAN C. KOHBERGER,

Defendant.

CASE NUMBER CR29-22-2805

**MOTION TO ALLOW CERTAIN
EXPERTS AND INVESTIGATORS
PROTECTED ACCESS TO VIEW IGG
MATERIALS**

COMES NOW, Bryan C. Kohberger, by and through his attorneys, and hereby moves this Court for An Order allowing certain experts and investigators protected access to view IGG materials.

Counsel for Mr. Kohberger has reviewed the materials currently available under the Court's Sealed Order for Disclosure of IGG Information and Protective Order filed with the

Court on 12/29/23 and requests the Court to include additional members of the defense team access to the materials.

Mr. Kohberger specifically requests the current Protective Order to expand and allow defense experts Dr. Leah Larkin, Bicka Barlow, and Steven Mercer access to the materials. Further, Mr. Kohberger requests that the criminal investigators that are part of the defense team be allowed to have access to the materials as well. Expanding the current Protective Order to include additional members of the defense team and Experts includes each additional person subject to the restrictions in the Protective Order.

This request is grounded in Mr. Kohberger's 6th Amendment right to effective assistance of counsel and counsel's ongoing duty to investigate the case brought against Mr. Kohberger. Access to these materials is necessary to investigate how and when Mr. Kohberger was identified as a suspect.

DATED this 1 day of February, 2024.

ANNE C. TAYLOR, PUBLIC DEFENDER
KOOTENAI COUNTY PUBLIC DEFENDER



BY: _____

ANNE TAYLOR
PUBLIC DEFENDER

CERTIFICATE OF DELIVERY

I hereby certify that a true and correct copy of the foregoing was personally served as indicated below on the 1 day of February, 2024 addressed to:

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

Elisa Massoth – via Email: legalassistant@kmrs.net


