

RAÚL R. LABRADOR
Attorney General
State of Idaho

JEFF NYE
Deputy Attorney General
Chief, Criminal Law Division

KALE D. GANS
Deputy Attorney General
P. O. Box 83720
Boise, Idaho 83720-0010
(208) 334-4534
E-mail: ecf@ag.idaho.gov

IN THE SUPREME COURT OF THE STATE OF IDAHO

STATE OF IDAHO,)	
)	No. 51091-2023
Plaintiff-Respondent,)	
)	Fremont Co. Case No.
v.)	CR22-21-1624
)	
LORI NORENE VALLOW a/k/a LORI)	UNCONTESTED MOTION FOR
NORENE DAYBELL,)	EXTENSION OF TIME FOR
)	FILING RESPONDENT'S BRIEF
Defendant-Appellant.)	

Plaintiff-Respondent, State of Idaho, by and through the undersigned attorney, moves this Court for an order extending the time in which the State's brief will be due until July 28, 2025. This motion is based on the affidavit of the undersigned attorney. Said affidavit is attached hereto and incorporated by reference herein.

DATED this 30th day of June, 2025.

/s/ Kale D. Gans
KALE D. GANS
Deputy Attorney General

AFFIDAVIT

STATE OF IDAHO)
) ss
COUNTY OF ADA)

KALE D. GANS, being first duly sworn on oath, deposes and says:

- (1) The date on which the brief of the State of Idaho is due is June 30, 2025.
- (2) No extensions of time have previously been granted.
- (3) An extension of time is requested inasmuch as the Office of the Attorney General, owing to the large volume of criminal appeals, has been unable to process all briefs and other filings within the established time limits, and would be unable to adequately research the issues involved in the case if an extension of time were not granted.
- (4) The State of Idaho requests an extension of 28 days from the due date, whereupon its brief would become due on July 28, 2025.
- (5) The parties have not stipulated that the proposed extension be granted.
- (6) The affiant assures the Court that every effort will be made to file the brief within the requested time.

CERTIFICATION

I certify under penalty of perjury pursuant to the law of the State of Idaho that the foregoing is true and correct.

6/30/2025
Date

/s/ Kale D. Gans
KALE D. GANS
Deputy Attorney General

CERTIFICATE OF UNCONTESTED MOTION

Per a standing agreement, the Office of Ferguson Durham, PLLC has no objection to this request for extension of time.

/s/ Kale D. Gans
KALE D. GANS
Deputy Attorney General

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this 30th day of June, 2025, served a true and correct copy of the UNCONTESTED MOTION FOR EXTENSION OF TIME FOR FILING RESPONDENT’S BRIEF to the attorney listed below by means of iCourt File and Serve:

CRAIG H. DURHAM
FERGUSON DURHAM, PLLC
chd@fergusondurham.com

/s/ Kale D. Gans
KALE D. GANS
Deputy Attorney General

KDG/mlg